

1 David C. Parisi (162248)  
2 Suzanne Havens Beckman (188814)  
3 PARISI & HAVENS LLP  
4 212 Marine Street, Suite 100  
5 Santa Monica, California 90405  
6 (818) 990-1299 (telephone)  
7 (818) 501-7852 (facsimile)  
8 dcparsi@parisihavens.com  
9 shavens@parisihavens.com

10 [Additional Counsel Listed on Signature Page]

11 *Attorneys for Plaintiff Angelica Cosio, on his own*  
12 *behalf, and behalf of all others similarly situated*

13 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

14 **COUNTY OF SAN FRANCISCO**

15 ANGELICA COSIO, an individual, on his  
16 own behalf and on behalf of all others  
17 similarly situated,

18 Plaintiff,

19 v.

20 INTERNATIONAL PERFORMING  
21 ARTS ACADEMY, LLC, a California  
22 limited liability company, and BARBIZON  
23 SCHOOL OF SAN FRANCISCO, INC., a  
24 California corporation, LION  
25 MANAGEMENT GROUP INC., a  
26 California corporation, LARRY D.  
27 LIONETTI, LENA QUESADA  
28 LIONETTI, and DOES 1-100, inclusive,

Defendants.

No. CGC-16-551337

**FIFTH AMENDED CLASS ACTION  
COMPLAINT FOR**

- 1) **VIOLATIONS OF LABOR CODE § 1702;**
- 2) **VIOLATIONS OF BUSINESS AND PROFESSIONS CODE § 17200; AND**
- 3) **VOIDABLE TRANSFERS UNDER CIVIL CODE § 3439.04**

**CLASS ACTION COMPLAINT**

Plaintiff Angelica Cosio (“Plaintiff” or “Cosio”) makes this complaint against Defendants International Performing Arts Academy, LLC (“IPAA”), Barbizon School of San Francisco, Inc. (“Barbizon”), Lion Management Group Inc. (“Lion”), Larry D. Lionetti (also known as Lawrence Dana Lionetti), Lena Quesada Lionetti, and Does 1 to 100 (collectively, “Defendants”). The term International Performing Arts Showcase (“IPAS”) refers to defendants IPAA and/or Lion Management Group Inc., and/or Does 1 through 100. Plaintiff’s allegations as to her own actions are based on personal knowledge. The other allegations are based on her

**ELECTRONICALLY  
FILED**  
*Superior Court of California,  
County of San Francisco*  
**03/01/2017**  
**Clerk of the Court**  
BY:VANESSA WU  
Deputy Clerk



1 counsel's investigation, and information and belief.

## 2 **Introduction**

3 1. Labor Code section 1702 prohibits anyone from "own[ing], operat[ing], or  
4 act[ing] in the capacity of an advance-fee talent representation service or advertis[ing],  
5 solicit[ing] for, or knowingly refer[ring] a person to, an advance-fee talent representation  
6 service." (Lab. Code, § 1702.) IPAS solicits and receives upfront fees from its victims for  
7 participating in "showcases," which (IPAS represents) are an opportunity to meet, try-out before  
8 and obtain representation with a talent agent, talent manager, or someone else who is supposedly  
9 in a position to obtain or provide IPAS's victims work in the entertainment industry. IPAS is an  
10 advance-fee talent representation service (this Complaint uses the abbreviation "AFTRS," *infra*)  
11 under Labor Code section 1702 because these "showcases", among other things, constitute  
12 "auditions" under Labor Code section 1701. Given Barbizon's relationship with IPAS,  
13 Barbizon's own services and marketing, and the broad statutory definition of an AFTRS,  
14 Barbizon also constitutes an AFTRS in its own right. In any event, Barbizon has violated Labor  
15 Code section 1702 by knowingly referring victims to IPAS.

16 2. Defendants' conduct also violates the unlawful and unfair prongs of the Unfair  
17 Competition Law, Business and Professions Code section 17200 ("UCL"). Defendants' conduct  
18 violates Labor Code section 1702's policy or spirit because its effects are comparable to or the  
19 same as a violation of Labor Code section 1702. Further, Defendants' conduct causes a  
20 substantial injury to consumers and competition that outweighs any countervailing benefits to  
21 consumers or to competition and was not an injury the consumers themselves could reasonably  
22 have avoided.

23 3. Plaintiff has suffered actual damages, injury in fact, and lost money, when  
24 Plaintiff paid several thousand dollars in fees to IPAS and Barbizon. Plaintiff alleges a class of  
25 all persons who reside in California at the time of this complaint who have paid IPAS to  
26 participate in one of IPAS's showcases. On her own behalf and on behalf of such class, Plaintiff  
27 seeks not less than treble damages, reasonable attorney's fees and costs, and injunctive relief  
28 under Labor Code section 1704.2; and restitution and injunctive relief under the UCL, as well as

1 the reasonable costs of the action (including attorneys' fees) under Code of Civil Procedure  
2 section 1021.5.

3 4. Plaintiff alleges on information and belief that Defendants have transferred assets  
4 between them, and then to Doe Defendants, and that these transfers were both actually and  
5 constructively voidable under California's version of the Uniform Voidable Transfer Act (Civ.  
6 Code, §§ 3439-3439.12) ("UVTA"). On her own behalf and on behalf of the alleged class, Cosio  
7 seeks injunctive relief and restitution under the UVTA, as well as an award of attorneys' fees  
8 under Code of Civil Procedure section 1021.5.

### 9 **Parties**

10 5. Plaintiff Angelica Cosio is a natural person residing in California. Cosio brings  
11 this action on behalf of herself and others similarly situated.

12 6. Defendant International Performing Arts Academy, LLC ("IPAA") is a California  
13 limited liability company which lists its address with the California Secretary of State at 1201  
14 West Fifth Street, Suite T-330, Los Angeles, California 90017. However, IPAA lists its mailing  
15 address as PO Box 719, San Francisco, California 94104 in its contracts and, on information and  
16 belief, IPAA's principal place of business is located at 420 Sutter Street, San Francisco,  
17 California 94108. Although IPAA describes itself as a "talent training and counseling service"  
18 (which are regulated under Labor Code section 1703 to 1703.6), it (instead or in addition)  
19 constitutes and qualifies as an AFTRS.

20 7. Defendant Barbizon School of San Francisco, Inc. is a California corporation  
21 which lists its address with the California Secretary of State at 420 Sutter Street, San Francisco,  
22 California 94108.

23 8. Defendant Lion Management Group Inc. is a California corporation which lists its  
24 address with the California Secretary of State at 420 Sutter Street, San Francisco, California  
25 94108.

26 9. Defendants Larry D. Lionetti (also known as Lawrence Dana Lionetti) and Lena  
27 Quesada Lionetti ("Individual Defendants") own and/or operate defendant Lion Management  
28 Group Inc.

1           10.     Defendant Lena Quesada Lionetti owns and/or operates defendant International  
2 Performing Arts Academy, LLC. Defendant Larry D. Lionetti (also known as Lawrence Dana  
3 Lionetti) operates defendant International Performing Arts Academy, LLC.

4           11.     Defendants Larry D. Lionetti (also known as Lawrence Dana Lionetti) and Lena  
5 Quesada Lionetti own and/or operate defendant Barbizon School of San Francisco, Inc.

6           12.     Plaintiff is currently ignorant of the true names and capacities, whether individual,  
7 corporate, associate, or otherwise, of the Defendants sued herein under the fictitious names Does  
8 1 through 100, inclusive, and therefore, sues such Defendants by such fictitious names. Plaintiff  
9 will seek leave to amend this complaint to allege the true names and capacities of said fictitiously  
10 named Defendants when their true names and capacities have been ascertained. Plaintiff is  
11 informed and believes and based thereon alleges that each of the fictitiously named Doe  
12 Defendants is legally responsible in some manner for the events and occurrences alleged herein,  
13 and for the damages suffered by Plaintiff.

14           13.     Plaintiff is informed and believes and based thereon alleges that all defendants,  
15 including the fictitious Doe Defendants, were at all relevant times acting as actual agents,  
16 conspirators, ostensible agents, partners and/or joint venturers and employees of all other  
17 defendants, and that all acts alleged herein occurred within the course and scope of said agency,  
18 employment, partnership, and joint venture, conspiracy or enterprise, and with the express and/or  
19 implied permission, knowledge, consent, authorization and ratification of their co-Defendants;  
20 however, each of these allegations are deemed “alternative” theories whenever not doing so  
21 would result in a contraction with the other allegations.

22           14.     The counterparty in Cosio’s contract as alleged below is “International  
23 Performing Arts Showcase” or “IPAS.” Plaintiff alleges on information and belief that IPAS is  
24 Lion Management, Inc. Defendants assert that Lion Management, Inc. had taken over the  
25 operations of International Performing Arts Academy, LLC by early 2013, but Cosio believes  
26 that Lion Management, Inc. did not take over International Performing Arts Academy, LLC’s  
27 operations completely until at least late 2014. In any event, it is not clear which corporate  
28 defendant operated the showcases alleged herein at relevant times. Hence, this complaint

1 hereinafter collectively refers to IPAA, Lion Management, Inc., and/or Defendants Does 1  
2 through 100 as “IPAS.” All Defendants, including Does 1 through 100, are collectively referred  
3 to as “Defendants.” Whenever this complaint refers to any act of Defendants, the allegations  
4 shall be deemed to mean the act of those defendants named in the particular cause of action, and  
5 each of them, acting individually, jointly and severally, unless otherwise alleged.

### 6 **Jurisdiction and Venue**

7 15. This Court may exercise jurisdiction over this case and these parties under Code  
8 of Civil Procedure § 410.10. This is a court of general jurisdiction, and the amount in  
9 controversy exceeds this court’s jurisdictional minimum.

10 16. At all times relevant to this complaint, the Defendants maintained their principal  
11 place of business at 420 Sutter Street, San Francisco, California 94108, and liability for the  
12 Defendants arose in the County of San Francisco. Venue in this County is proper under Code of  
13 Civil Procedure section 395.5.

14 17. All allegations in this complaint are based on information and belief and/or the  
15 documents and information currently available and in the hands of Plaintiff’s attorneys, and are  
16 such that additional evidentiary support and detail will be forthcoming after a reasonable  
17 opportunity for further investigation or discovery.

18 18. To eliminate any possible ambiguity potentially created by any other allegation in  
19 this Complaint (such that this allegation shall control over each and every other allegation in this  
20 Complaint), Plaintiff, all Defendants, and all members of the class alleged herein are all citizens  
21 of California, and the total amount in controversy as to any particular class member (including  
22 Plaintiff) does not exceed \$75,000.

### 23 **Plaintiff’s Individual Allegations**

24 19. A young woman known by Cosio’s relative recruited Cosio’s minor daughter (to  
25 preserve her anonymity and privacy, hereinafter referred to as “Child”) to attend a Barbizon  
26 audition/interview, indicating that Child could obtain employment and an income in the  
27 entertainment industry with the right assistance. Shortly thereafter, at the end of December 2012,  
28 Child auditioned before one of Barbizon’s directors in Barbizon’s offices in Sacramento who

1 offered Child a place in Barbizon’s acting classes. Cosio paid around \$2,000 for six months of  
2 Barbizon’s tuition with a credit card, with the classes ending in the end of May 2013 or early  
3 June 2013.

4 20. At or about the time Cosio paid Barbizon, Barbizon provided Cosio with a  
5 welcome packet. A true and correct copy of Barbizon’s June 2013 letter is included as pages 1 to  
6 3 of the Appendix attached to this Complaint. The packet described Barbizon’s services:

7 **Barbizon is currently searching for new models, actors, singers and dancers**  
8 **to be coached and presented to Hollywood’s top licensed agents, managers**  
9 **and casting directors.** Some of our credits include Twilight, Hannah Montana,  
iCarly, CW’s 90210, Wizards of Waverly Place, Suite Life on Deck, ABC’s Glee,  
project Runway, Shake it Up, Good Luck Charlie and many, many more.

10 (Pl.’s appen. at p. 3 [bold added].) The Barbizon packet contained a full-page advertisement for  
11 IPAS, which stated: “TOP LICENSED AGENTS, MANAGERS AND CASTING DIRECTORS  
12 SEARCHING FOR NEW MODELS, ACTORS, SINGERS, DANCERS” and “ALL  
13 BARBIZON GRADUATES GET THE CHANCE TO PARTICIPATE,” and listed a variety of  
14 talent agents on a page titled “Hollywood’s Top Agencies Attending the International  
15 Performing Arts Showcase.” (Pl.’s appen. at pp. 4-5 [bold added].)

16 21. The Barbizon welcome packet also stated: “Admission to Barbizon Model &  
17 Talent is a selection process. Each prospective student is evaluated based on confidence,  
18 commitment, desire, skill level, and parental support. . . . Prospective students must meet or  
19 exceed admissions criteria for acceptance to Barbizon.” (Pl.’s appen. at p. 3.) This statement,  
20 together with the representations by Barbizon’s scout alleged above, led Cosio to believe that  
21 Barbizon selected Child based on its perception of her propensity to succeed professionally in the  
22 entertainment industry.

23 22. On or about June 12, 2013, Barbizon sent a letter to Cosio indicating that Child  
24 was scheduled for a headshot and “try-out” with IPAS on July 13, 2013. A true and correct copy  
25 of Barbizon’s June 2013 letter is included as pages 6 to 8 of the Appendix attached to this  
26 Complaint, except that it has been redacted to preserve the privacy and anonymity of Child. The  
27 June 2013 letter states in relevant part:

28 Congratulations! *Now that you have completed your training we can assist you in*

1 pursuing your career. The Try-out will be conducted by Ms Kathleen Dewey, the  
2 official Talent Scout for the International Performing Arts Showcase (IPAS),  
3 which will be held in Los Angeles in February 2014. Ms Dewey has been working  
4 in the model & talent industry for the past 25 years, and has successfully helped  
5 hundreds of individuals realize their dreams in the fields of Print and Runway  
6 Modeling, Acting, Singing and Dancing. It is important to be here if you are  
7 interested in receiving information to work as a Model, Actress or Actor, Singer  
8 or Dancer. If both parents are actively involved in the students life, then both of  
9 them attending this try-out is very important. For more info, visit  
10 www.talentshowcase.tv.

11 **If a model/talent is under 18 years of age, a parent or guardian MUST**  
12 **attend. Even if you are over 18, bringing your parents is still strongly**  
13 **encouraged. Due to limited space, please no additional friends or family**  
14 **members. This time is reserved for you. Please make this a priority.**

15 (Pl.'s appen. at p. 8 [bold in original; other emphasis added].)

16 23. Shortly after receiving Barbizon's June 2013 letter, Cosio reviewed the website at  
17 talentshowcase.tv. The talentshowcase.tv website contains a number of significant  
18 representations about IPAS's services. True and correct copies of different portions of the  
19 talentshowcase.tv website are included as pages 9 to 13 of the Appendix attached to this  
20 Complaint. One portion of talentshowcase.tv website states "AUDITION TODAY" and  
21 "UPLOAD YOUR PHOTO AND BE SEEN BY TOP AGENTS AND MANAGERS." (Pl.'s  
22 appen. at p. 9.) Another portion of the website states "HOLLYWOOD AGENTS, MANAGERS  
23 & CASTING DIRECTORS ARE SEARCHING FOR YOU!" and "CALL FOR AN AUDITION  
24 (888) 493 1923." (Pl.'s appen. at p. 10.) A third portion of the website states "Call to learn more  
25 and set up an audition (888) 493 1923." (Pl.'s appen. at p. 11.) A fourth portion of the website  
26 states "Our Mission For our conference to serve as one of the largest networking and resource  
27 opportunities for industry professionals. To provide an exciting, professional, courteous and safe  
28 environment in which models and/or talent will be showcased." (Pl.'s appen. at p. 12.)

29 24. Additionally, the talentshowcase.tv website also contains a large link labeled  
30 "VIDEO TOUR" which links to an embedded video at <https://vimeo.com/68977075>. In that  
31 video, a young woman (evidently a minor named Georgia Clark) narrates the following text:

32 **Welcome to the International Performing Arts Showcase. Here at the**  
33 **Showcase, they bring top models, actors, singers, and dancers to Los Angeles**  
34 **every year to be showcased in front of the top licensed agents, managers, and**  
35 **casting directors.** My parents and I learned so much with all the amazing  
36 industry seminars. Paul Mitchell and Motives Makeup [?] did my hair and make-  
37 up for the big run-way day. And some of the most fun I had was making new

1 friends and dancing at the launch party in Jennifer Lopez’s Congo Room. **Great  
ready to fast-forward your career.**

2 Cosio emphasizes the relevant parts of the narrative above. Throughout the video, a large banner  
3 of text across the lower quarter of the screen which says “AUDITION TODAY FOR  
4 HOLLYWOOD AGENTS AND MANAGERS” superimposed over another banner that says  
5 “SHOWCASE” in the style of a marquee composed of lightbulbs.

6 25. On or about July 13, 2013, Cosio and Child attended an audition with IPAS’s  
7 talent scout in the Hyatt Regency Hotel on L Street in Sacramento. IPAS did not conduct  
8 individualized auditions for Child and the other children present that day. Rather, IPAS  
9 conducted the children’s auditions all together, in a mechanical, rote process. The IPAS  
10 personnel indicated that they would call Cosio back if IPAS decided to select Child for its  
11 showcase. IPAS personnel told Cosio that, if IPAS accepted Child into its program, Child would  
12 audition in front of 100 top entertainment industry professionals for five days in Los Angeles.

13 26. At the audition, Cosio received a folder containing various written materials from  
14 Barbizon and IPAS. A true and correct excerpt of these materials is included as pages 14 to 26 of  
15 the Appendix attached to this Complaint. (In addition or in the alternative, Cosio may have  
16 received some of these materials during the appointment the next day.) These materials included  
17 a letter from the “Barbizon Education Department” which stated, in relevant part:

18 It is our goal at Barbizon to provide each student with the opportunity to try-out  
19 for a leader in the entertainment industry, Ms. Kathleen Dewey, a Talent Scout for  
the International Performing Arts Showcase (IPAS).

20 Ms. Dewey will be meeting with you and your family at the appointment time you  
21 chose today. During your appointment, you will be viewing and receiving your  
22 photo CD and for those of you who have qualified for IPAS through the IPAS try-  
out, you will make arrangements to take the next step in the industry.

23 Parents are **REQUIRED** to be present at this appointment if you are under 18 or  
living at home with your family.

24 You will receive a call regarding your IPAS try-out results, prior to your  
25 appointment. Please make sure you and your family has fully read the entire  
packet and materials provided, today...after your try-out.

26 **This opportunity only happens once and we are excited and pleased to have**  
27 **Ms. Dewey here today.**

28 (Pl.’s appen. at p. 14 [underlining, bold in original].)

1           27.     The materials also included documents from IPAS (sometimes using the names  
2 International Performing Arts Showcase, Hollywood Showcase or, simply, Showcase). These  
3 materials included representations about IPAS’s selection process and its services in a question-  
4 and-answer format:

5           Showcase Frequently Asked Questions

6           Q.     **Why is someone selected for the Showcase?**

7           A.     **Our Talent Scouts must feel the model or talent possesses the**  
8           **potential to be successful in the industry.** Those accepted are placed in  
9           an elite group that auditioned successfully for fashion modeling,  
commercial modeling, TV commercials, television/film acting, singing  
and dancing, and they receive an evaluation of their talent.

10          Q.     **What are the chances of starting a career in the modeling or talent**  
11          **industry as a result of my participation in the Showcase?**

12          A.     **It is the very best opportunity in this industry. Imagine having**  
13          **maximum exposure to scores of the industries [sic] “A” list watching**  
14          **you perform. Success is at its highest. It is up to the model or talent**  
15          **afterwards to follow through with the agencies and managers who are**  
16          **interested in them.** Showcase staff, as well as your talent scout will assist  
with this. . . .

15 (Pl.’s appen. at p. 24 [bold added].) These materials also included the following statement about  
16 IPAS’s services:

17           If selected, you will be traveling to Los Angeles to learn the latest in modeling,  
18           acting and talent techniques, how to market yourself in the industry, and all the  
19           in’s and out’s of the business from the leaders in this industry. **You will also be**  
20           **showcased before the top modeling and talent agents, managers, casting**  
21           **directors/producers, film directors/producers, record labels and industry**  
22           **professionals from the entertainment capital of the world, Hollywood.**

23           **... You will meet, try-out for and interview with scores of modeling and talent**  
24           **agents and managers during this showcase that you would never have an**  
25           **opportunity to see otherwise.** It is truly a once in a lifetime event for the  
26           potential model or talent. In just a few days, you will have achieved what would  
27           ordinarily take years of effort and tens of thousands of dollars!

28           . . .  
Additionally, preparation workshops at the school to make sure you are ready to  
make the most of this opportunity. The staff will supervise all aspects of your  
preparation and assist your showcase.

(Pl.’s appen. at p. 16 [underlining in original; bold added].) The materials also state that the  
“Showcase package includes: . . . Enrollment in five (5) Official Showcases/Auditions (based on  
selection by your Showcase talent scout [and] Entrance to ‘call back’ room[.]”(Pl.’s appen. at p.



1 17.)

2 28. The materials also contained a list of “Top 10 Reasons to Attend the Showcase,”  
3 which included the following statements about IPAS’s services:

4 You will be showcased before the best talent agencies and management  
5 companies in HOLLYWOOD!

6 You will read for casting directors, producers and directors who are currently  
7 working in the industry.

8 You will be exposed to VIPs that you could only dream about!

9 You could do what some of the industry’s working models and talent have  
10 already done ... be showcased at Showcase.

11 The #1 reason to be showcased at this event - You could be traveling the world as  
12 THE NEXT TOP MODEL or a STAR!

13 (Pl.’s appen. at p. 20.)

14 29. IPAS called Cosio later that day and advised Cosio that IPAS had selected Child.  
15 Child was very excited to be accepted, although Cosio knew that the cost of IPAS’s services and  
16 attending the showcase might place serious strain on her family’s finances. Cosio and Child  
17 attended the appointment scheduled the next day (July 14, 2013). The statements in IPAS’s  
18 written materials, together with the representations by the IPAS personnel and in Barbizon’s  
19 June 2013 letter alleged above, and the overall presentation of the July 2013 event as a “try-out”  
20 or audition, led Cosio to believe that IPAS selected Child based on its perception of her  
21 propensity to succeed professionally in the entertainment industry.

22 30. At the appointment, Cosio and Child signed a contract with IPAS. A true and  
23 correct copy of this contract is included as pages 27 to 28 of the Appendix attached to this  
24 Complaint, except that it has been redacted to preserve the privacy and anonymity of Child. This  
25 contract itself states: “The International Performing Arts Showcase The 4-day event, located in  
26 Los Angeles, is the largest networking and resource opportunity for industry professionals-  
27 agents, managers, casting directors, choreographers and record executives.” (Pl.’s appen. at p.  
28 23.) At the appointment, IPAS personnel explained some of the costs of IPAS’s showcase. IPAS  
indicated that the total fees will be (roughly) \$8,000, that it needed an upfront payment of \$2,000  
to hold the Child’s place in its next showcase, and that Cosio had to pay the remaining \$6,000

1 balance in full beforehand for Child to attend IPAS's January 2014 showcase. IPAS indicated  
2 that some scholarships were available; Cosio later learned that IPAS meant that she and Child  
3 could solicit donations from third parties to attend IPAS's showcase. Cosio advised Child that it  
4 would be very difficult and onerous to come up with the money to pay IPAS, but Child was  
5 sorely disappointed by the prospect she could not attend the IPAS showcase so Cosio scraped the  
6 money together. In fact, paying IPAS's fees caused Cosio and her family severe financial  
7 distress. Nonetheless, on July 14, 2013, Cosio paid IPAS \$2,000 with a check written by a  
8 relative. Cosio paid her relative \$2,000 as reimbursement for the check on or about July 28, 2013.

9 31. After IPAS selected her, Child attended IPAS's classes at the Hyatt Regency  
10 Hotel on a monthly basis. (A true and correct copy of the schedule for these classes is included  
11 as page 29 of the Appendix attached to this Complaint.) Cosio continued to make monthly  
12 payments to IPAS via direct deposit during this time: she paid IPAS \$1,198 on August 16, 2013,  
13 September 16, 2013, October 16, 2013, November 16, 2013 and again November 19, 2013.

14 32. Cosio and Child attended the IPAS's January 2014 showcase at the Millennium  
15 Biltmore Hotel Los Angeles. During the January 2014 showcase, Cosio received a directory of  
16 showcase participants. A true and correct copy of the directory is included as pages 30 to 97 of  
17 the Appendix attached to this Complaint, except that it has been redacted to preserve the privacy  
18 and anonymity of Child. The directory contains the following statement:

19 ABOUT US

20 The International Performing Arts Showcase was founded to provide a venue for  
21 talented models, performers and others **who are ready to meet industry**  
22 **professionals and pursue entertainment careers.** Showcase talent directors  
23 hold nationwide auditions, searching for qualified talent to be invited to our  
showcase. This Los-Angeles-based event hosts over 40 top professionals currently  
working with actors, singers, dancer and models.

24 (Pl.'s appen. at p. 32 [emphasis added].)

25 33. At the showcase, the Child performed brief skits and walked down a runway  
26 before talent agents and talent managers. Cosio and Child received a "callback sheet" which  
27 indicated that a few companies attending expressed interest in Child. A true and correct copy of  
28 this letter is included as pages 98 and 99 of the Appendix attached to this Complaint. Cassiopeia

1 Productions (a film production company), MP Management, and Luber Rocklin Entertainment  
2 (talent managers or, possibly, unlicensed talent agents) were the three entities that requested  
3 callbacks. Accordingly, during the last part of the showcase, IPAS personnel guided Child and  
4 Cosio to different tables within the Biltmore, where Child and Cosio met with representatives  
5 from these firms very briefly. However, Cosio and Child never received any further  
6 communication from these firms or any further guidance or instruction from IPAS or Barbizon  
7 about how to obtain a career in the entertainment industry. Cosio ultimately paid roughly \$8,000  
8 to IPAS, but this did not include expenses Cosio incurred traveling to Los Angeles for IPAS's  
9 showcase.

### 10 **Class Certification Allegations**

11 34. **Class Definition:** Cosio seeks to certify a class and brings this Complaint against  
12 Defendants, pursuant to Code of Civil Procedure section 382, on behalf of herself and the  
13 following class ("Class"):

14 All natural persons who are California citizens at the time Cosio's original  
15 complaint was filed (April 5, 2016) who (a) paid IPAS so that the Class member,  
16 the Class member's child (or other beneficiary) could attend a showcase operated  
17 by IPAS; where (b) IPAS and/or Barbizon represented such showcase as an  
18 opportunity for the Class member or other beneficiary to meet with, interview  
19 with, perform before, or display talent before any person who IPAS and/or  
20 Barbizon represented to have input into the decision to select a person for  
21 employment in the entertainment industry, such as talent agents or talent  
22 managers (i.e., where IPAS and/or Barbizon made representations to the Class  
23 member that are materially similar to those made to Cosio); where (c) such  
24 payment was made within four (4) years of the date of this Complaint; (d)  
25 excluding any such payments that were (i) a percentage of the income earned by  
26 the Class member's beneficiary in the entertainment industry; or (ii) consisted  
27 entirely reimbursement for out-of-pocket costs actually incurred by IPAS on  
28 behalf of the Class member's beneficiary for services rendered by an independent  
third party.

Excluded from the Class are Defendants, any of the Defendants' current or former agents, legal  
representatives, predecessors, successors, assigns, and employees. Also excluded from the Class  
are the judge and staff to whom this case is assigned, and any member of the judge's immediate  
family. Cosio reserves the right to revise the definition of the Class based on facts learned during  
discovery. Cosio is a member of the Class that she seeks to represent.

35. **Subclass Definition:** Cosio seeks to certify a subclass and brings this Complaint

1 against Defendants, pursuant to Code of Civil Procedure section 382, on behalf of herself and the  
2 following subclass (“Subclass”):

3 All Class members who (a) paid IPAS so that the Class member, the Class  
4 member’s child (or other beneficiary) could attend a showcase operated by IPAS;  
5 after (b) Barbizon referred the Class member (or the Class members’ beneficiary)  
6 to IPAS to participate in a showcase operated by IPAS.

7 Excluded from the Subclass are Defendants, any of the Defendants’ current or former agents,  
8 legal representatives, predecessors, successors, assigns, and employees. Also excluded from the  
9 Subclass are the judge and staff to whom this case is assigned, and any member of the judge’s  
10 immediate family. Cosio reserves the right to revise the definition of the Subclass based on facts  
11 learned during discovery. Cosio is a member of the Subclass that she seeks to represent.

12 36. **Class Numerosity:** The exact number of members of the Class is unknown, but  
13 such information is readily ascertainable by Defendants. The January 2014 IPAS showcase  
14 directory identifies more than 50 showcase participants. (Pl.’s appen. at pp. 48-87.) On  
15 information and belief, Cosio alleges that IPAS arranged and conducted showcases in the  
16 summer of 2012, the winter of 2012, the winter of 2013, and the summer of 2014, and in  
17 November 2015 and November 2016 with a similar volume of participants, and will arrange and  
18 conduct showcases hereafter every six to twelve months. On the basis of these allegations, Cosio  
19 asserts that individual joinder of all members of the Class is likely to be impracticable. Cosio  
20 expressly does not allege at this time, however, that all showcase participants in the directory are  
21 members of the Class or that the number of Class members necessarily equals or exceeds 100.

22 37. **Subclass Numerosity:** The exact number of members of the Subclass is unknown  
23 and is not available to Cosio at this time, but such information is readily ascertainable by  
24 Defendants. On information and belief, Cosio alleges that IPAS largely restricts showcase  
25 participants to “graduates” of Barbizon’s acting classes and that Barbizon referred all or  
26 substantially all of the Class members to IPAS. On the basis of these allegations, Cosio asserts  
27 that individual joinder of all members of the Subclass is likely to be impracticable. Cosio  
28 expressly does not allege at this time, however, that all showcase participants are members of the  
Subclass or that the number of Subclass members necessarily equals or exceeds 100.

1           38.     **Class and Subclass Commonality:** Common questions of fact and law exist as to  
2 all members of the Class and Subclass and predominate over the questions affecting only  
3 individual members of the Class and Subclass. Identification of the individuals who qualify as a  
4 member of the Class and/or Subclass will be sufficient to establish liability to that individual.

5           39.     **Typicality:** Plaintiff's claims are typical of the claims of the other members of the  
6 Class and Subclass. Plaintiff is not different in any relevant way from any other member of the  
7 Class or Subclass, and the relief she seeks is common to the Class and Subclass.

8           40.     **Adequate Representation:** Plaintiff will fairly and adequately represent and  
9 protect the interests of the other members of the Class and the Subclass: her interests do not  
10 conflict with their interests. Plaintiff has retained counsel competent and experienced in complex  
11 class actions, and she intends to prosecute this action vigorously.

12           41.     **Predominance and Superiority:** The Class and Subclass alleged in this  
13 Complaint is appropriate for certification because class proceedings are superior to all other  
14 available methods for the fair and efficient adjudication of this controversy, since joinder of all  
15 members is impracticable. The damages suffered by each individual member of the Class and  
16 Subclass will likely be relatively small, especially given the burden and expense of individual  
17 prosecution of the complex litigation necessitated by Defendants' actions. It would be virtually  
18 impossible for members of Class or Subclass individually obtain effective relief from  
19 Defendant's misconduct. Even if members of the Class or Subclass themselves could sustain  
20 such individual litigation, it would still not be preferable to a class action, because individual  
21 litigation would increase the delay and expense to all parties due to the complex legal and factual  
22 controversies presented in this Complaint. By contrast, class actions present far fewer  
23 management difficulties and provide the benefits of single adjudication, economy of scale, and  
24 comprehensive supervision by a single Court. Economies of time, effort, and expense will be  
25 fostered and uniformity of decisions will be ensured.

26           42.     **Generally Applicable Policies:** This class action is also appropriate for  
27 certification because Defendants have acted or refused to act on grounds generally applicable to  
28 the class, thereby making appropriate final injunctive relief or corresponding declaratory relief

1 with respect to the Class and Subclass as a whole. The policies of the Defendants challenged  
2 herein apply and affect members of the Class and Subclass uniformly, and Plaintiff’s challenge  
3 of these policies hinges on Defendants’ conduct, not on facts or law applicable only to Plaintiff.

4 43. **Injunctive Relief is Appropriate:** Based on information and belief, Defendants  
5 continue to engage in the improper practices discussed above. Injunctive relief is necessary and  
6 appropriate to enjoin Defendants’ conduct and to prevent irreparable harm to Plaintiff and  
7 members of the Class and Subclass for which they have no adequate remedy at law.

8 **Labor Code Section 1702 Applies to the Defendant’s Business Model**

9 44. Labor Code section 1702 bans the AFTRS business model entirely: it is illegal to  
10 “own, operate, or act in the capacity of an [AFTRS] or advertise, solicit for, or knowingly refer a  
11 person to, an [AFTRS].” (Lab. Code, § 1702.) IPAS and Barbizon employ an AFTRS business  
12 model: selling the opportunity to obtain work in the entertainment industry for upfront fees.  
13 Labor Code section 1702 does not require Cosio to prove that (1) IPAS’s promises that its  
14 services could lead to stardom were false; (2) IPAS knew its promises were false; or (3) Cosio or  
15 Child relied on any such promises. Certainly, anyone who used IPAS’s services was attempting  
16 to obtain work in the entertainment industry; it is likely some percentage would succeed (with or  
17 without IPAS’s help). Likewise, anyone with Defendants’ business model would genuinely hope  
18 that their victims succeed in finding work in the entertainment industry—regardless of whether  
19 their services made that success appreciably more likely.

20 45. Cosio does allege (on information and belief) that Defendants “accepted” or  
21 “selected” all their victims without regard for the victims’ propensity for professional success in  
22 the entertainment industry—but rather on the basis of their ability to pay Defendants. The  
23 Defendants’ “selection process” was used to create an impression of exclusivity that would  
24 motivate the Defendants’ victims to pay Defendants in the pursuit of an entertainment career.

25 46. However, Labor Code section 1702’s ban on AFTRSs applies without regard to  
26 the truth of Defendant’s marketing or their intent. Class members are damaged by IPAS and  
27 Barbizon’s violation of Labor Code section 1702 when they pay fees to IPAS and Barbizon,  
28 because IPAS and Barbizon’s business model is illegal and their receipt of such fees is illegal.

1           47.     **Artists:** Child and the children (and/or other beneficiaries) of the other Class  
2 members were “artists” under Labor Code section 1701. Labor Code section 1701 defines an  
3 “artist” as:

4                   **a person who is or seeks to become** an actor, actress, model, extra, radio artist,  
5                   musical artist, musical organization, director, musical director, writer,  
6                   cinematographer, composer, lyricist, arranger, or other **person rendering**  
7                   **professional services in** motion picture, theatrical, radio, television, Internet,  
8                   print media, or other **entertainment enterprises** or technologies.

9 (Lab. Code, § 1701, subd. (a) [emphasis added].) One can and should reasonably and readily  
10 infer from IPAS’s marketing materials that the Child and the Class members’ children sought to  
11 render professional services in the entertainment industry. Indeed, there would be no rational  
12 reason for Class members to pay thousands of dollars for IPAS’s services unless they or their  
13 children wanted to be employed in the entertainment industry.

14           48.     **Fees:** The money paid to IPAS for Child and the children (and/or other  
15 beneficiaries) of the other Class members constitutes a “fee” under Labor Code section 1701.  
16 Labor Code section 1701 defines a “fee” as “any money or other valuable consideration paid or  
17 promised to be paid by or on behalf of an artist for services rendered or to be rendered by any  
18 person conducting business under this chapter.” (Lab. Code, § 1701, subd. (d).) Cosio’s  
19 definition of the Class ensures all Class members paid at least some money to Barbizon and/or  
20 IPAS which falls into this broad definition (and does not fall into any statutory exception). (Cf.  
21 Lab. Code, § 1701, subd. (d)(1), (2).)

22           49.     **Auditions:** IPAS’s “showcases” constitute auditions under Labor Code section  
23 1701. Labor Code section 1701 defines an “audition” as

24                   **any activity for the purpose of obtaining employment**, compensated or not, **as**  
25                   **an artist whereby an artist meets with, interviews or performs before, or**  
26                   **displays his or her talent before, any person**, including a producer, a director,  
27                   or a casting director, or an associate, representative, or designee of a producer,  
28                   director, or casting director, who has, or is represented to have, **input into the**  
29                   **decision to select an artist for an employment opportunity.**

30 (Lab. Code, § 1701, subd. (b) [emphasis added].) Labor Code section 1701 defines an  
31 “employment opportunity” as “the opportunity to obtain work as an artist, whether compensated  
32 or not.” (Lab. Code, § 1701, subd. (c).) Hence, an “audition” broadly covers any meeting or

1 performance with an individual in the position to obtain or provide employment in the  
2 entertainment industry.

3 50. On information and belief, IPAS operated one or more showcases every year in  
4 the class period, and all of these showcases took place at the Millennium Biltmore Hotel Los  
5 Angeles. As IPAS markets its showcases, their obvious and patent purpose is to arrange meetings  
6 with and performances before individuals in a position to obtain or provide employment in the  
7 entertainment industry for Class members or their children. For instance, IPAS describes itself as  
8 “the very best opportunity in this industry” to “start[] a career in the modeling or talent industry,”  
9 a “venue for talented models [and] performers . . . to meet industry professionals and pursue  
10 entertainment careers.” (Pl.’s appen. at pp. 24, 32.) IPAS likewise promised that the attendees  
11 “will be showcased before the top modeling and talent agents, managers, casting  
12 directors/producers, film directors/producers” and “will read for casting directors, producers and  
13 directors who are currently working in the industry.” (Pl.’s appen. at pp. 16, 20.) Indeed, IPAS  
14 frequently even directly uses the word “audition” to describe its showcases. (Cf. *id.* at pp. 9-11;  
15 17, and video alleged in paragraph 20, *supra.*)

16 51. **AFTRSs:** The Legislature’s actual statutory language is broad and plainly  
17 encompasses IPAS’s misconduct alleged herein. As stated above, Labor Code section 1702  
18 prohibits any from “own[ing], operat[ing], or act[ing] in the capacity of an advance-fee talent  
19 representation service or advertis[ing], solicit[ing] for, or knowingly refer[ring] a person to, an  
20 advance-fee talent representation service.” (Lab. Code, § 1702.) Labor Code section 1702.1  
21 provides a lengthy and comprehensive definition for an advance-fee talent representation service:

22 “Advance-fee talent representation service” means a person who provides or  
23 offers to provide, or advertises or represents itself as providing, **an artist**, directly  
24 or by referral to another person, with **one or more of the following services**  
25 **described below, provided that the person charges or receives a fee from or**  
26 **on behalf of an artist for** photographs, Internet Web sites, or other reproductions  
or other promotional materials as an artist; lessons, coaching, seminars,  
workshops, or similar training for an artist; or **for one or more of the following**  
**services:**

- 27 (1) Procuring or attempting to procure an employment opportunity or  
an engagement as an artist.
- 28 (2) Procuring or attempting to procure an **audition** for an artist.



1 (3) Managing or directing the development of an artist’s career.

2 (4) Procuring or attempting to procure a **talent agent or talent**  
3 **manager**, including an associate, representative, or designee of a  
4 talent agent or talent manager.

4 (Lab. Code, § 1702.1, subd (a) [emphasis added].) Labor Code section 1702.1 also covers “a  
5 person who charges or receives a fee from, or on behalf of, an artist for any product or service  
6 required for the artist to obtain, from or through the person, any of the services described in  
7 paragraphs (1) to (4), inclusive, of subdivision (a).” (Lab. Code, § 1702.1, subd (a).)

8 52. IPAS meets the definition under Labor Code section 1702.1 because (a) it charged  
9 and received an upfront fee from Class members or on behalf of the Class members’ children; in  
10 exchange for (b) participation in IPAS’s showcases, which constitute auditions under section  
11 1701 (see paragraph 44, *supra*); and/or (c) attempting to procure a talent agent or talent manager  
12 for the Class members or their children (cf., e.g., Pl.’s appen. at pp. 10, 16, 20, 27 and video  
13 alleged in paragraph 20, *supra*).

14 53. Barbizon meets the definition under Labor Code section 1702.1 because (a) it  
15 charged and received an upfront fee from Class members or on behalf of the Class members’  
16 children; in exchange for (b) attempting to procure a talent agent or talent manager for the Class  
17 members or their children (cf. *id.* at p 3); and/or (c) lessons, seminars, or similar training for  
18 Class members or their children, which were required for participation in IPAS’s showcases (cf.  
19 *id.* at p 8).

20 **FIRST CAUSE OF ACTION:**  
21 **Violation of Labor Code Section 1702 Against All Defendants**  
22 **by Plaintiff Individually and on Behalf of the Class**

22 54. Plaintiff hereby incorporates by reference the allegations contained in all  
23 preceding paragraphs of this complaint.

24 55. As alleged above, IPAS and Barbizon constitute an AFTRS under Labor Code  
25 section 1702.1. IPAS, Barbizon, their owners, operators, and those acting in the capacity of IPAS  
26 and Barbizon have violated Labor Code section 1702.

27 56. In addition or in alternative to the allegations above, IPAS constitutes an AFTRS  
28 under Labor Code section 1702.1, and Barbizon violated Labor Code section 1702 by knowingly

1 referring Cosio and the other Subclass members to IPAS. Barbizon's knowledge can be inferred  
2 from the close cooperation and/or overlap between Barbizon and IPAS's employees, agents,  
3 officers, and/or owners, etc., and Barbizon's inclusion of IPAS's marketing material in  
4 Barbizon's own welcome packet.

5 57. Class members are damaged by IPAS and Barbizon's violation of Labor Code  
6 section 1702 when they pay fees to IPAS and Barbizon, because IPAS and Barbizon's receipt of  
7 such fees is illegal.

8 58. IPAS, Barbizon, the Individual Defendants, and the Doe Defendants are jointly  
9 and severally liable to Cosio and the other Class members for IPAS and/or Barbizon's violations  
10 of Labor Code section 1702 because they had actual knowledge of such violations, and they  
11 provided IPAS and/or Barbizon substantial assistance with such violations (by, e.g., assisting  
12 with marketing, referring victims to IPAS and/or Barbizon, collection of fees, and/or arranging  
13 try-outs, auditions, and/or showcases). IPAS, Barbizon, the Individual Defendants, and the Doe  
14 Defendants are jointly and severally liable to Cosio and the other Class members for aiding and  
15 abetting IPAS and/or Barbizon's violations of Labor Code section 1702.

16 59. IPAS, Barbizon, the Individual Defendants and the Doe Defendants are also  
17 jointly and severally liable to Cosio and the other Class members for IPAS and/or Barbizon's  
18 violations of Labor Code section 1702 because they agreed to assist and participated in such  
19 violations, and Cosio and the other Class members were damaged by their payment of illegal  
20 fees to IPAS and/or Barbizon as a result of such participation. IPAS, Barbizon, and the Doe  
21 Defendants are jointly and severally liable to Cosio and the other Class members for civil  
22 conspiracy with IPAS and/or Barbizon to violate Labor Code section 1702.

23 60. To eliminate any possible ambiguity potentially created by any other allegation in  
24 this Complaint (such that this paragraph shall control over each and every other allegation in this  
25 Complaint), the Individual Defendants are liable under Labor Code section 1702 solely because  
26 they own, operate, and/or act in the capacity of IPAS and/or Barbizon. Plaintiff does not allege  
27 that the Lionettis' conduct necessarily forms a significant basis for the claims asserted, or that the  
28 Lionettis' necessarily had direct contact or interactions with Cosio or any other Class member.



1 UCL violations.

2 65. IPAS, Barbizon, the Individual Defendants and the Doe Defendants are also  
3 jointly and severally liable to Cosio and the other Class members for IPAS and/or Barbizon's  
4 UCL violations because they agreed to assist and participated such violations, and Cosio and the  
5 other Class members were damaged by their payment of illegal fees to IPAS and/or Barbizon as  
6 a result of such participation. IPAS, Barbizon, the Individual Defendants, and the Doe  
7 Defendants are jointly and severally liable to Cosio and the other Class members for civil  
8 conspiracy with IPAS and/or Barbizon to violate the UCL.

9 66. To eliminate any possible ambiguity potentially created by any other allegation in  
10 this Complaint (such that this paragraph shall control over each and every other allegation in this  
11 Complaint), the Lionettis are liable under the UCL solely because they own, operate, and/or act  
12 in the capacity of IPAS and/or Barbizon. Plaintiff does not allege that the Lionettis' conduct  
13 necessarily forms a significant basis for the claims asserted, or that the Lionettis' necessarily had  
14 direct contact or interactions with Cosio or any other Class member.

15 67. Cosio, on her own behalf, and behalf of the other Class members, seeks restitution  
16 from Defendants, injunctive and equitable relief including a constructive trust under Business &  
17 Professions Code § 17203, and to recover the costs of the action (including attorneys' fees) under  
18 Code of Civil Procedure section 1021.5.

19 **THIRD CAUSE OF ACTION:**  
20 **Voidable Transfers under the Uniform Voidable Transfer Act (Civ. Code, §§ 3439-**  
21 **3439.12) by Plaintiff individually and on behalf of the Class, against all Lion, Barbizon,**  
22 **the Lionettis, and the Doe Defendants**

23 68. Plaintiff hereby incorporates by reference the allegations contained in all  
24 preceding paragraphs of this complaint.

25 69. **Transfers of Assets:** On information and belief, Lion and Barbizon have made  
26 transfers of their assets to each other, the Individual Defendants, and the Doe Defendants  
27 ("Transfers") both before and after Lion and Barbizon's debts to Cosio and the other members of  
28 the Class accrued. All such Transfers fit within the extremely broad definition of Civil Code  
section 3439.01(i), and may take the form of any sort of transfer of property received or owned

1 by Lion and/or Barbizon, the release of any loan or other claim, or the acceptance of any sort of  
2 lien or other encumbrance. These Transfers include the following transfers of funds from one of  
3 Lion's bank accounts, which are listed by date and description:

4	June 7, 2013	INTUIT PAYROLL S QUICKBOOKS
5	June 19, 2013	AMEX EPAYMENT ACH PMT
6	June 24, 2013	INTUIT PAYROLL S QUICKBOOKS
7	July 2, 2013	AMEX EPAYMENT ACH PMT
8	July 8, 2013	AMEX EPAYMENT ACH PMT
9	July 9, 2013	INTUIT PAYROLL S QUICKBOOKS
10	July 16, 2013	AMEX EPAYMENT ACH PMT
11	July 22, 2013	AMEX EPAYMENT ACH PMT
12	July 24, 2013	INTUIT PAYROLL S QUICKBOOKS
13	August 1, 2013	AMEX EPAYMENT ACH PMT
14	August 5, 2013	AMEX EPAYMENT ACH PMT
15	August 8, 2013	INTUIT PAYROLL S QUICKBOOKS
16	August 21, 2013	AMEX EPAYMENT ACH PMT
17	August 23, 2013	INTUIT PAYROLL S QUICKBOOKS
18	August 29, 2013	AMEX EPAYMENT ACH PMT
19	September 5, 2013	AMEX EPAYMENT ACH PMT
20	August 8, 2013	INTUIT PAYROLL S QUICKBOOKS
21	September 18, 2013	AMEX EPAYMENT ACHPMT
22	September 23, 2013	AMEX EPAYMENT ACH PMT
23	September 24, 2013	INTUIT PAYROLL S QUICKBOOKS

1	September 30, 2013	AMEX EPAYMENT ACH PMT
2	September 30, 2013	AMEX EPAYMENT ACH PMT
3	September 30, 2013	AMEX EPAYMENT ACH PMT
4	September 30, 2013	AMEX EPAYMENT ACH PMT
5	October 9, 2013	INTUIT PAYROLL S QUICKBOOKS
6	October 17, 2013	AMEX EPAYMENT ACH PMT
7	October 21, 2013	AMEX EPAYMENT ACH PMT
8	October 23, 2013	AMEX EPAYMENT ACH PMT
9	October 24, 2013	INTUIT PAYROLL S QUICKBOOKS
10	November 4, 2013	AMEX EPAYMENT AMEX EPAYMENT ACH PMT
11	November 7, 2013	INTUIT PAYROLL S QUICKBOOKS
12	November 15, 2013	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
13	November 20, 2013	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
14	November 22, 2013	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
15	November 22, 2013	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
16	December 2, 2013	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
17	December 3, 2013	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
18	December 4, 2013	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
19	March 7, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
20	March 24, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
21	March 31, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
22	April 1, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

1	April 1, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
2	April 8, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
3	April 9, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
4	April 11, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
5	April 22, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
6	April 22, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
7	April 24, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
8	April 25, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
9	May 1, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
10	May 6, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
11	May 8, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
12	May 8, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
13	May 20, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
14	May 22, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
15	June 2, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
16	June 4, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
17	June 9, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
18	June 10, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
19	June 17, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
20	June 24, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR

1		CCD
2	June 25, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
3	July 9, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
4		
5	July 10, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
6	July 10, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
7	July 22, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
8	July 24, 2014	INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
9		
10	August 6, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
11	August 8, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
12		
13	August 14, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
14	August 15, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
15	August 21, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
16	August 21, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
17	August 22, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
18		
19	August 22, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
20	September 9, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
21		
22	September 18, 2014	AMEX EPAYMENT ACH PMT PPD LENA LIONETTI
23	September 18, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
24	September 24, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
25		
26	October 2, 2014	AMEX EPAYMENT ACH PMT PPD LENA LIONETTI
27	October 6, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
28		



1	October 8, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
2	October 9, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
3		
4	October 20, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
5	October 23, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
6		
7	November 3, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
8	November 7, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
9		
10	November 20, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
11	November 24, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
12		
13	November 25, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
14		
15	December 2, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
16	December 9, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
17		
18	November 3, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
19	December 24, 2014	INTUIT PAYROLL S QUICKBOOKS LION MANAGEMENT GR CCD
20		
21	December 24, 2014	AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
22	January 5, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
23		
24	January 8, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
25		
26	January 21, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
27		
28	November 23, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD

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November 23, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
February 3, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
February 9, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
February 12, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
February 20, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
February 24, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
February 9, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
February 24, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
February 26, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
February 27, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
March 2, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
March 2, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
March 23, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
March 23, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT PPD LENA LIONETTI
April 7, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA

1		LIONETTI
2	May 7, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
3		
4	May 8, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
5		
6	May 8, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
7		
8	June 1, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
9		
10	June 8, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
11		
12	June 17, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
13		
14	June 22, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
15		
16	June 24, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
17		
18	July 9, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
19		
20	July 21, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
21		
22	July 23, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
23		
24	July 30, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
25		
26	August 7, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
27		
28	August 10, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
	August 19, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

1	August 24, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION
2		MANAGEMENT GR CCD
3	September 1, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
4		LIONETTI
5	September 3, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
6		LIONETTI
7	September 9, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION
8		MANAGEMENT GR CCD
9	September 21, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
10		LIONETTI
11	September 21, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
12		LIONETTI
13	September 24, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION
14		MANAGEMENT GR CCD
15	September 28, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
16		LIONETTI
17	September 28, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
18		LIONETTI
19	October 7, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
20		LIONETTI
21	October 8, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION
22		MANAGEMENT GR CCD
23	October 16, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
24		LIONETTI
25	October 20, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA
26		LIONETTI
27	October 23, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION
28		MANAGEMENT GR CCD

1	October 23, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
2	October 23, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
3		
4	November 4, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
5		
6	November 9, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
7	November 12, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
8		
9	November 23, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
10		
11	November 24, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
12		
13	November 30, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
14		
15	December 1, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
16		
17	December 9, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
18	December 23, 2015	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
19		
20	December 29, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
21		
22	December 3, 2015	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
23		
24	January 8, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
25		
26	January 20, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
27		
28		

1	January 23, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
2	January 29, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT PPD LENA LIONETTI
3		
4	February 9, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
5		
6	February 9, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
7		
8	February 22, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
9		
10	February 24, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
11		
12	February 24, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
13		
14	March 8, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
15		
16	March 11, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
17		
18	March 11, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
19		
20	March 17, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
21		
22	March 24, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
23		
24	March 24, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
25		
26	March 30, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
27		
28	April 4, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
	April 4, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

1		LIONETTI
2	April 8, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
3		
4	April 11, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
5		
6	April 14, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
7		
8	April 22, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
9		
10	April 22, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
11		
12	May 9, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
13		
14	May 9, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
15		
16	May 10, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
17		
18	May 24, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
19		
20	May 26, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
21		
22	May 27, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
23		
24	June 6, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
25		
26	June 9, 2016	Preauthorized Debit INTUIT PAYROLLS QUICKBOOKS LION MANAGEMENT GR CCD
27		
28	June 21, 2016	Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI
	June 23, 2016	Preauthorized Debit ADP EEPAY/GARNWC EEPAY/GARN LION MANAGEMENT GR

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June 23, 2016 Preauthorized Debit ADP EEPAY/GARNWC EEPAY/GARN LION MANAGEMENT GR

June 24, 2016 Preauthorized Debit ADP TAX/401K TAX/401K LION MANAGEMENT GR

June 28, 2016 Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

July 5, 2016 Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

July 5, 2016 Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

July 8, 2016 Preauthorized Debit EEPAY/GARNWC EEPAY/GARN LION MANAGEMENT GR

July 11, 2016 Preauthorized Debit AMEX EPAYMENT ACH PMT WEB LENA LIONETTI

July 11, 2016 Preauthorized Debit ADP TAX/401K TAX/401K LION MANAGEMENT GR

July 22, 2016 Preauthorized Debit ADP EEPAY/GARNWC EEPAY/GARN LION MANAGEMENT GR

July 25, 2016 Preauthorized Debit ADP TAX/401K TAX/401K LION MANAGEMENT GR

To the extent necessary, Cosio incorporates the more complete allegations of the Transfers from paragraph 71 of her unredacted Fourth Amended Complaint. The details alleged regarding the foregoing Transfers do not reflect the ultimate recipients of those Transfers, but do identify the financial intermediaries who distributed those Transfers to the ultimate transferees. Cosio does not have sufficient discovery or access to sufficient evidence to detail beyond what is alleged above. All other information regarding the foregoing Transfers are known to the Defendants, and within the Defendants' exclusive knowledge. In addition, the foregoing Transfers are not the only Transfers alleged by this Complaint. The foregoing Transfers do not include any of the Transfers from any of IPAS's other bank accounts (or any of IPAS's other financial accounts), or



1 any Transfers by Barbizon. Cosio does not have sufficient discovery or access to sufficient  
2 evidence to allege the other Transfers in the same level of detail. All such other Transfers, and all  
3 other information regarding the foregoing Transfers, are known to the Defendants, and within the  
4 Defendants' exclusive knowledge.

5         70.     **Insolvency:** All the Transfers alleged herein injure or injured Cosio and the other  
6 members of the Class by impairing or prejudicing (or threatening to do so) their ability to collect  
7 a class judgment and/or settlement which covers the total value of the other claims asserted  
8 against the Defendants in this Complaint. Cosio alleges on information and belief that IPAS and  
9 Barbizon's entire business models violate Labor Code section 1702. Indeed, despite closely  
10 investigating Defendants, Cosio has not found any evidence that Lion or Barbizon have any  
11 revenue which does not violate Labor Code section 1702. Hence, all or almost all of Lion and  
12 Barbizon's revenue consists of "fees" under Labor Code section 1701(d), and so all or almost of  
13 Lion and Barbizon's assets derive from such fees. Based on the evidence available to Cosio  
14 (including the Showcase Directory), Cosio alleges on information and belief that IPAS's  
15 revenues from fees paid by Cosio and the other members of the Class to attend Defendants'  
16 "showcases" conducted in the summer of 2012, the winter of 2012, the winter of 2013, and the  
17 summer of 2014, and in November 2015 and November 2016 total from \$5 to \$20 million. Given  
18 IPAS and Barbizon's liability to the Class for receipt of such fees under Labor Code section  
19 1704.2 and Business & Professions Code § 17203, such fees constitute "debts" to Cosio and  
20 other members of the Class (under the definition of California Civil Code section 3439.01(d)).  
21 Based on the claims under Labor Code section 1702 and the UCL alleged above, Cosio and the  
22 other members of the Class became "creditors" of IPAS and Barbizon (under the definition of  
23 California Civil Code section 3439.01(d)) and Defendants became "debtors" to Cosio and the  
24 other members of the Class (under the definition of California Civil Code section 3439.01(e))  
25 when IPAS and Barbizon received such fees which Cosio and the other members of the Class  
26 paid to IPAS and Barbizon to attend Defendants' "showcases." Based the foregoing analysis (all  
27 of Lion and Barbizon's assets constitute debts to the Class members), Cosio alleges on  
28 information and belief that Lion is and has been insolvent (under the definition of California

1 Civil Code section 3439.02) since March 21, 2013 to the present, and that Barbizon also is and  
2 has been insolvent since April 5, 2012 to the present.

3 71. Moreover, during the September 28, 2016 hearing on Defendants' demurrer,  
4 Defendants' counsel stated that the damages in this case were from \$40 to \$60 million. Based on  
5 the evidence available to Cosio (including IPAS and Barbizon's apparent size and scale), Cosio  
6 alleges on information and belief that the combined assets of the Individual Defendants, Lion,  
7 and Barbizon do not exceed \$40 million, so that Lion is and has been insolvent (under the  
8 definition of California Civil Code section 3439.02) since March 21, 2013 to the present, and  
9 that Barbizon also is and has been insolvent since April 5, 2012 to the present.

10 72. In addition, the Individual Defendants continually made Transfers that kept IPAS  
11 and Barbizon very thinly capitalized. As a result of these Transfers, IPAS very often issued  
12 checks from one or more bank accounts with insufficient funds, resulting in overdrafts.  
13 Moreover, as a result of these Transfers, IPAS and Barbizon frequently did not have enough  
14 money to pay compensation to their respective employees. Frequently, employees of IPAS  
15 would receive "wages" and/or "commissions" from Barbizon, and employees of Barbizon would  
16 receive "wages" and/or "commissions" from IPAS and/or IPAA. As these Transfers resulted in  
17 Lion and Barbizon overdrafting and/or exhausting their bank accounts, the Transfers constituted  
18 substantially all of Lion and Barbizon's assets. Additionally, Defendants have received many  
19 disputes with customers like Cosio, but have often failed to pay back fees and other necessary  
20 compensation to the customers making those disputes.

21 73. **No Reasonably Equivalent Value:** Cosio alleges on information and belief that  
22 the Individual Defendants used assets from Lion and/or Barbizon to make Transfers in the form  
23 of dividends or other profits to the Individual Defendants, and/or the Doe Defendants (whether  
24 or not Defendants disguised and/or concealed the payment of such dividends or other profits as  
25 payment of "wages," "commissions," or putative business expenses, such as rent or licensing  
26 fees, to affiliated entities under the Individual Defendants' control). Dividends or other payment  
27 of profits to shareholders (or any other form of return on equity) are not for "value" under Civil  
28 Code section 3439.03. In addition or in the alternative, Cosio alleges on information and belief

1 that the Individual Defendants and/or the Doe Defendants have used IPAS and/or Barbizon's  
2 assets to pay their personal expenses (including payment of personal expenses disguised as  
3 payment of putative business expenses).

4         74.       Cosio further alleges on information and belief that IPAS and/or Barbizon have  
5 used their assets to make Transfers in the form of payments of "wages" or "commissions" to the  
6 Individual Defendants and/or the Doe Defendants, in exchange for the services "operat[ing], or  
7 act[ing] in the capacity of" IPAS and Barbizon, or for "advertis[ing], solicit[ing] for, or  
8 knowingly refer[ring] a person to" IPAS or Barbizon. (Lab. Code, § 1702.) The Doe Defendants  
9 alleged in this paragraph received consideration or compensation directly in exchange for or in  
10 proportion to fees they collected for IPAS and/or Barbizon (which fees IPAS and/or Barbizon  
11 violated Labor Code section 1702 and/or the UCL by receiving). Some of the Doe Defendants  
12 alleged in this paragraph directly and willfully caused IPAS and Barbizon to incur liability on  
13 section 1702 and/or the UCL claims alleged in this Complaint. Some of the Doe Defendants  
14 alleged in this paragraph knew that Defendants "accepted" or "selected" all their victims without  
15 regard for the victims' propensity for professional success in the entertainment industry—but  
16 rather on the basis of their ability to pay Defendants, and that Lion's "selection process" was  
17 used to create an impression of exclusivity that would motivate Lion's victims to pay in the  
18 pursuit of an entertainment career. Some of the Doe Defendants alleged in this paragraph were  
19 knowing participants in IPAS and Barbizon's violations of section 1702 and/or the UCL. Some  
20 of the Doe Defendants alleged in this paragraph knew that they were facilitating IPAS and  
21 Barbizon's violation of section 1702 and/or the UCL. Some of the Doe Defendants alleged in  
22 this paragraph knew that their services for IPAS and Barbizon in fact violated section 1702  
23 and/or the UCL. The Doe Defendants alleged in this paragraph do not include persons who  
24 provided facially lawful and customary services used in businesses which do not violate Labor  
25 Code 1702 (including landlords, utility companies, acting teachers, janitors, computer  
26 technicians, secretarial staff, administrative staff, etc.)

27         75.       Talent agents and talent managers are generally paid ten percent (10%) of their  
28 clients' income from working in the entertainment industry. Cosio alleges on information and



1 Defendants and/or the Doe Defendants did not receive any assets via the Transfer in good faith.  
2 The Individual Defendants and/or the Doe Defendants actively participate in the Transfers with  
3 the intent to injure the Class members by impairing or prejudicing (or threatening to do so) their  
4 ability to obtain a settlement and/or collect a class judgment which covers the complete value of  
5 their other claims. In addition or the alternative, the Individual Defendants and/or the Doe  
6 Defendants had actual knowledge of facts (including the Transfers themselves, the nature of  
7 IPAS and Barbizon’s business, that IPAS and Barbizon derived all their revenue as AFTRSs,  
8 complaints by consumers against IPAS and Barbizon, and IPAS and Barbizon’s insolvency) that  
9 would suggest to a reasonable person that the Transfers were voidable.

10       79.     **Intentional Voidable Transfers:** The Transfers were voidable under Civil Code  
11 section 3439.04(a)(1) because the Transfers were made with the actual intent to hinder the claims  
12 of Cosio and the other members of the Class. These Transfers were made to the Individual  
13 Defendants and Doe Defendants, who are insiders with respect to Lion and Barbizon. The  
14 Lionettis knew full well that IPAS and Barbizon’s marketing brought Lion and Barbizon within  
15 the definition of an AFTRS, and that IPAS and Barbizon were liable under Labor Code section  
16 1704.2 and Business & Professions Code § 17203. This knowledge was evident, e.g., from  
17 Defendants’ effort to claim they were operating as “talent training and counseling services,” and  
18 claiming to be exclusively regulated under Labor Code section 1703 to 1703.6, which ostensibly  
19 provided a safe harbor from the application of section 1702. Moreover, the Lionettis knew that  
20 the Transfers left Lion and Barbizon very thinly capitalized, knew that the Transfers injure or  
21 injured the Class members by impairing or prejudicing (or threatening to do so) their ability to  
22 obtain a settlement and/or collect a class judgment and/or settlement which covers the complete  
23 value of their other claims, and continued to engage in such Transfers, and therefore intended  
24 that such Transfers limit the amount of assets available to any of Lion or Barbizon’s creditors.

25       80.     **Constructive Voidable Transfers:** In addition or the alternative, the Transfers  
26 were voidable under Civil Code section 3439.04(a)(2)(A) because (a) Lion and/or Barbizon did  
27 not receive reasonably equivalent value for the Transfers and (b) Lion and/or Barbizon were  
28 engaged in the operation of an AFTRS for which their net worth remaining after the Transfers

1 was unreasonably small in relation to their businesses—particularly where any revenue from  
2 their operation as an AFTRS in form of fees from Class members created corresponding debts to  
3 those Class members.

4       81.     **Remedies:** Cosio seeks restitution, injunctive and equitable relief including  
5 avoidance of all Transfers found to be voidable, appointment of a receiver, and imposition of a  
6 constructive trust under California Civil Code section 3439.07, and to recover the costs of the  
7 action (including attorneys’ fees) under California Code of Civil Procedure section 1021.5 for  
8 herself and the other members of the Class from and as to Lion, Barbizon, the Individual  
9 Defendants, and the Doe Defendants.

10       WHEREFORE, Plaintiff Angelica Cosio prays that the Court enter judgment and orders  
11 in her favor and against Defendants Lion Management Group Inc., International Performing Arts  
12 Academy, LLC, Barbizon School of San Francisco, Inc., Larry D. Lionetti (also known as  
13 Lawrence Dana Lionetti), Lena Quesada Lionetti, and Does 1 to 100 as follows:

- 14       a.     An order certifying the Class, directing that this case proceed as a class action,  
15             and appointing Cosio and his counsel to represent the Class;
  - 16       b.     An order certifying the Subclass, directing that this case proceed as a class action,  
           and appointing Cosio and his counsel to represent the Subclass;
  - 17       c.     Judgment for damages against Defendants, and in favor of Cosio and the other  
18             Class members in an amount proven at trial but “not less than three times the  
           amount paid” to Defendants under Labor Code section 1704.2;
  - 19       d.     Judgment for restitution against Defendants, and in favor of Cosio and the other  
20             Class members in an amount proven at trial;
  - 21       e.     Injunctive and equitable relief, including injunctions enjoining further violations  
22             of Labor Code section 1702 and Business & Professions Code § 17200 and a  
           constructive trust, under Labor Code section 1704.2 and Business & Professions  
           Code § 17203;
  - 23       f.     Injunctive and equitable relief including avoidance of all Transfers found to be  
24             voidable, and imposition of a constructive trust under California Civil Code  
           section 3439.07, against Lion, Barbizon, the Individual Defendants, and the Doe  
25             Defendants and in favor of Cosio and the other members of the Class;
  - 26       g.     An order granting reasonable attorney’s fees and costs, under Labor Code section  
           1704.2 and Code of Civil Procedure section 1021.5;
  - 27       h.     Such other and further relief as this Court may deem appropriate.
- 28

1 Dated: March 1, 2017

By: /s/Ethan Preston

2 David C. Parisi (162248)  
3 Suzanne Havens Beckman (188814)  
4 PARISI & HAVENS LLP  
5 212 Marine Street, Suite 100  
6 Santa Monica, California 90405  
7 (818) 990-1299 (telephone)  
8 (818) 501-7852 (facsimile)  
9 dparisi@parisihavens.com  
10 shavens@parisihavens.com

11 Zack Broslavsky (241736)  
12 Jonathan A. Weinman (256553)  
13 BROSLAVSKY & WEINMAN, LLP  
14 11755 Wilshire Boulevard, Suite 1250  
15 Los Angeles, California 90025  
16 (310) 575-2550 (telephone)  
17 (310) 464-3550 (facsimile)  
18 zbroslavsky@bwcounsel.com  
19 jweinman@bwcounsel.com

20 Ethan Preston (263295)  
21 PRESTON LAW OFFICES  
22 4054 McKinney Avenue, Suite 310  
23 Dallas, Texas 75204  
24 (972) 564-8340 (telephone)  
25 (866) 509-1197 (facsimile)  
26 ep@eplaw.us

27 *Attorneys for Plaintiff Angelica Cosio, on*  
28 *her own behalf, and behalf of all others*  
*similarly situated*

# Appendix to Complaint



# BARBIZON

Model & Talent



**Lyndsy Fonseca**

Nikita • Kick Ass  
Desperate Housewives



**David Archuleta**

American Idol



**Sheena**

America's Next Top Model



**Moises Arias**

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Seattle, WA 98101

4035 NE Sandy Blvd, Suite 225  
Portland, OR 97212

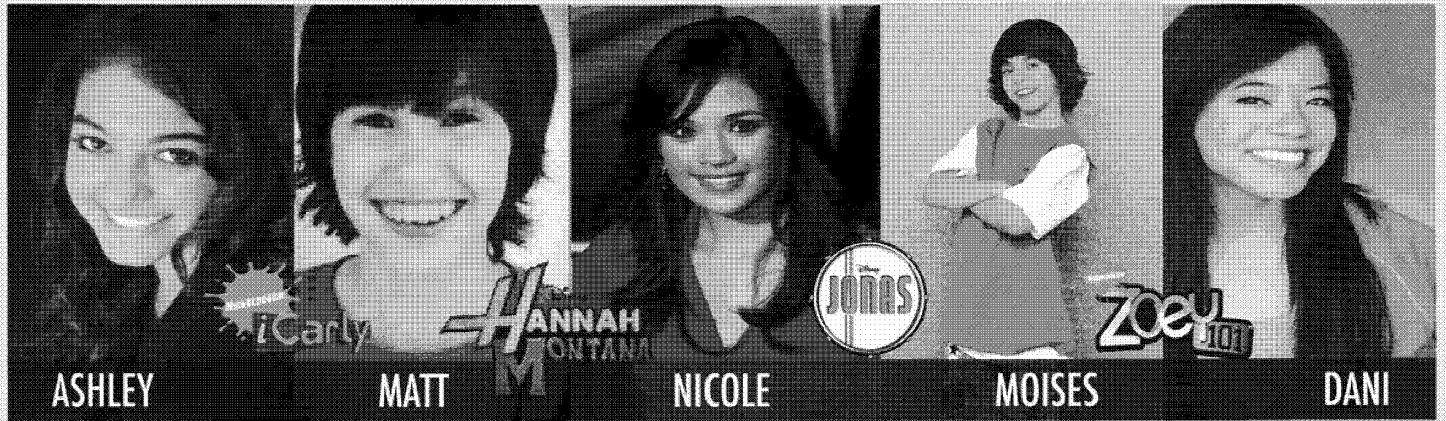
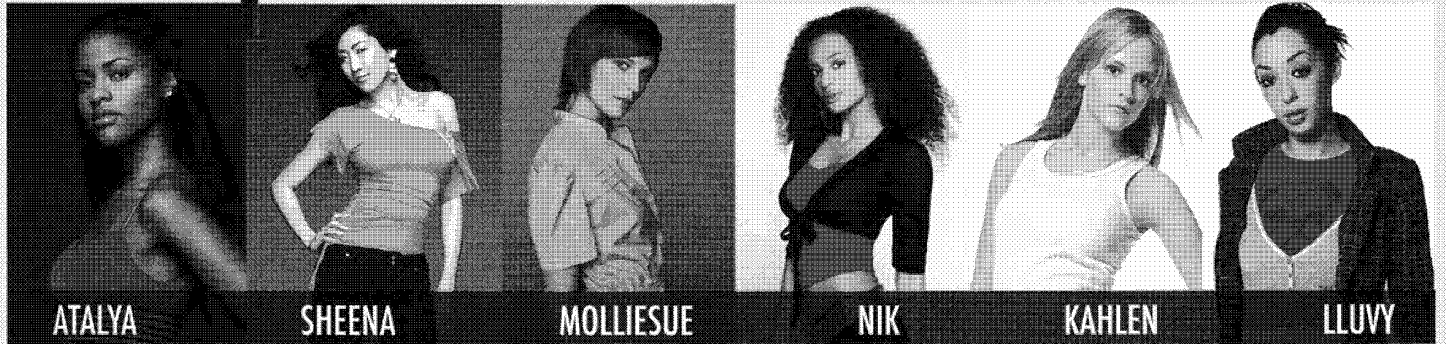
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Plaintiff's Appendix 1

# BARBIZON SUCCESS!

Do YOU know what you have in common with all of our success stories?  
 They were ALL scouted just like you were,  
 discovered at an event like this and started where YOU are today!

## AMERICA'S NEXT top model



# Welcome to Barbizon!

Since being established in New York in 1939, Barbizon's graduates have graced the covers of top fashion magazines, as well as appeared on Fashion Week's stages, on television and on the silver screen.

Barbizon is currently searching for new models, actors, singers and dancers to be coached and presented to Hollywood's top licensed agents, managers and casting directors. Some of our credits include Twilight, Hannah Montana, iCarly, CW's 90210, Wizards of Waverly Place, Suite Life on Deck, ABC's Glee, Project Runway, Shake it Up, Good Luck Charlie and many, many more.

Barbizon works with parents to educate and prepare young talent to gain a stronger sense of identity, self-confidence and increased emotional stability, resulting in the power to think ideas through and make the right decisions. For over 70 years, Barbizon mentors and coaches have been assisting teenagers through their most critical years as they mature into young adults. Through it all, Barbizon has maintained a fundamental approach in our training and development. In fact, our approach and methods are slightly old fashioned - we believe that feeling confident in oneself means speaking with authority, walking with pride and dressing with style.

We look forward to meeting you and your family today!

Sincerely,

Frances Sanders  
Barbizon Education



## Admissions Criteria

Admission to Barbizon Model & Talent is a selection process. Each prospective student is evaluated based on confidence, commitment, desire, skill level, and parental support.

## Evaluation Process

Barbizon selection and evaluation process includes a workshop to best prepare prospective students with the tools and skills necessary to achieve a positive experience and outcome. Directors meet with each family individually to discuss the prospective student's needs, goals and what they hope to gain from this opportunity. Prospective students must meet or exceed admissions criteria for acceptance to Barbizon.





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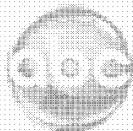
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# Hollywood's Top Agencies

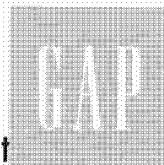
Attending the International Performing Arts Showcase  
& guest teachers for Barbizon training



RALPH LAUREN



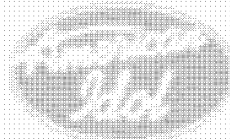
twilight



ABA Talent Agency  
Actors Dispatch  
Amsel, Eisenstadt and Frazier Talent Agency  
Australian Institute of Dramatic Arts  
Avalon Artists Group  
Blackwood Management  
Bloc Agency  
Capitol Records  
Carol Lefko Casting  
Cassiopeia Productions  
CESD  
Chancellor Entertainment  
Chayil Entertainment  
Clear Talent Group  
Coast to Coast Models  
Damon Sharpe Music  
Diverse Talent Group  
Don Buchwald & Associates  
Visage

LA Models  
LHB Entertainment  
Look Model Agency  
Luber Roklin Entertainment  
MMC Entertainment  
MP Management  
Nassif & Baca Casting  
New York Model Management  
Next LA Management  
Next Model Management  
Nomad Management  
One Management  
Passport Model Management  
PB Management  
PhotoGenics Models  
Rage Agency  
Rage Models  
Reel, Stage & Page, Inc

DPM Talent  
Elite Model Management - NY  
Epic Models New York  
Hollander Talent Group  
Hollywood Management Company  
HRi Talent  
Impact Artists Group  
Industry 415 Creative  
JE Model and Talent - San Fran  
JLA Talent  
Wilhelmina Models - NY RPM Talent Agency  
Society Entertainment  
Talent Ink NY-LA  
Temptation Management  
The Corsa Agency  
The Glick Agency  
The Savage Agency  
Thrive Records  
Totally Kids Management



top model



Disney

INTERNATIONAL PERFORMING ARTS  
**SHOWCASE**

The #1 Networking Resource for Agents & Managers



Corporate Office; San Francisco  
420 Sutter Street, Second Floor  
San Francisco, CA 94108  
Tel: (415) 293 - 7219 Fax: (415) 276-2858

June 12, 2013

Dear [REDACTED] and/or Parent(s)

You have been scheduled for your official Headshot and Try-out for IPAS (International Performing Arts Showcase) on **Saturday July 13, 2013**. The Headshot is part of your program; you do not have to pay for it. Enclosed you will find very detailed information on the time, what to wear, etc. **Please** pay close attention, because your Headshot and Try-out times are specific just for you. The **Headshot and try-out** will be located at : **Hyatt Regency Sacramento; 1209 L Street, Sacramento, CA 95814.**

Keep in mind, you may still have a few more classes to take here at Barbizon, **but I suggest** you take your official photo now. Also, you will have to choose a return appointment for **the Sunday, Monday or Tuesday.**

Please make every effort to attend the Headshot and Try-out, since we have to **coordinate** the Talent Scout, Photographers, Hair and Make-up Artists and secure a location for the Try-out.  
***They are in Sacramento this day only!***

**Come with washed and styled hair. Put on make-up at home (except if under 10 yrs. old).  
The Hair and Make-up Artists will only be doing touch-ups!**

Please read all the information...it should answer all your questions, then **call or email** to confirm whether or not you will be attending. ***I will not call you back, to say I got your call, just leave a message.***

If you have an outstanding balance, please call the Registrar Dept. to make payment arrangements at: (415) 293-7215 or (415) 293-7216.

***I will not return calls concerning questions that can be answered by simply reading the information!***

Sincerely,

Nigel;  
SF Education Director  
[Nigel@talentshowcase.tv](mailto:Nigel@talentshowcase.tv)  
(415) 293-7219

***P.S. This is a one-time appointment, there are no make-up dates!***

## Stockton/ Sacramento - HEADSHOT INFORMATION

**Date:** Saturday, July 13, 2013 (*Call to confirm this date immediately after reading all info!!!!*)

**Location:** Hyatt Regency Sacramento; 1209 L Street, Sacramento, CA 95814.

**Time:** Headshot: 10:30am      Try-out: 11:30am

**\*\*\*Parents:** You **MUST** check in **WITH** your student so you can book a return appointment to get the result of the Try-out and pick up your Headshot CD. *Do not call me for a day & time.*

### HAIR and MAKE-UP INFORMATION

**WASH & STYLE YOUR HAIR-LOOK FABULOUS!!! Hair is a huge part of your look!!**

\*Wear your hair in a natural, everyday style using suggestions from hair class or Imaging/Make-over.

\*Clean and shiny hair looks best in photography.

\***Hair should be trimmed at least three weeks before your shoot date for a fresh, clean look.**

\*Do not wear headbands, bows, or visible hair clips.

**WASH YOUR FACE AND APPLY MAKE-UP**

\*Females (based on your age), apply concealer, foundation, powder, **blush, etc.** **BRING** your mascara & lip stick /gloss. Using an eyelash curler is also highly recommended.

### CLOTHING INFORMATION

\*For males and females – your **headshot top must be:**

-Long or  $\frac{3}{4}$  length sleeves, and **ONE**, solid color

-Solid, **BRIGHT** colors: Red, orange, hot pink, bright green, purple, blue...

(*Vivid, bright colors make you stand out better.*)

-Flattering necklines – A v-neck or round neck (not low-cut), or **button down** works well.

-Your top should look new and be neatly pressed – no wrinkles, stains, “pills” or holes.

\***SOLID COLORS ONLY. NO PRINTS, LOGOS, LETTERING, OR PICTURES ON THE TOP.**

#### DO NOT WEAR:

X Do not wear turtlenecks, t-shirts, tank tops, or spaghetti strap tops.

X Do not wear stripes, emblems, or prints on tops. **Solid colors only.**

X Do not wear two different colored tops layered on top of each other.

X Do not wear tops with jewels, rhinestones, or sequins.

X Be sure your top is not low-cut or see-through in bright light.

X **DO NOT WEAR BLACK, WHITE...OR FORMAL WEAR** (Tux, Suit, Prom Dresses, etc.)

Keep in mind that you will be Trying-out right after your headshot. Dress to impress – skirts, dresses, or long dress pants for females, dress slacks for males. Do not wear jeans or denim of any kind.

**Proper runway shoes for males and females are mandatory. You do not have to bring two outfits.**

Females- wear only 1 (one) set of small earrings in your ears, if desired. **NO OTHER JEWELRY.**

Males are strongly discouraged from wearing jewelry. Keep your look as neutral and marketable as possible.

**STUDENTS WHO ARRIVE UNPREPARED/IMPROPERLY DRESSED WILL BE SENT HOME**

## RETURN APPOINTMENT INFORMATION

Return appointments will be the following days:

Sunday July 14, Monday July 15 and Tuesday July 16, 2013 .

Appointment times usually range from 9am-7pm, and are about 45 minutes each.

You will receive your headshot in CD (digital) format during your return appointment with the Talent Scout, provided your account is paid in full. If not, it will be mailed to you once the account is settled. *Parents you must choose the return appointment time when you check-in.*

## TRY-OUT INFORMATION

Congratulations! Now that you have completed your training we can assist you in pursuing your career. The Try-out will be conducted by Ms Kathleen Dewey, the official Talent Scout for the International Performing Arts Showcase (IPAS), which will be held in Los Angeles in February 2014. Ms Dewey has been working in the model & talent industry for the past 25 years, and has successfully helped hundreds of individuals realize their dreams in the fields of Print and Runway Modeling, Acting, Singing and Dancing. It is important to be here if you are interested in receiving information to work as a Model, Actress or Actor, Singer or Dancer. If both parents are actively involved in the students life, then both of them attending this try-out is very important. For more info, visit: [www.talentshowcase.tv](http://www.talentshowcase.tv).

If a model/talent is under 18 years of age, a parent or guardian **MUST** attend. Even if you are over 18, bringing your parents is still strongly encouraged. Due to limited space, please no additional friends or family members. This time is reserved for you. Please make this a priority.

**DATE: Saturday, July 13, 2013**

**Place: Hyatt Regency Sacramento; 1209 L Street, Sacramento, CA 95814.**

**TRY-OUT TIME: 11:30am – right after headshots, until about 1:30pm.**

**Bring: Resume (if you have one), any small photo that shows your face (that we can keep) and a pen.**

**Models: You will do a simple walk on the runway, and your memorized commercial.**

**Actors: You will perform your memorized monologue, or commercial. (One from class or your own)**

**Singers: You will have up to one minute to perform a song. You may bring your own music (CD format), or sing a cappella.**

**Dancers: You will have up to one minute to perform your dance. Bring your own music. Costumes are not necessary, but you may change into dance clothes if necessary.**

**WEAR: Look fabulous & professional – absolutely no jeans or sneakers.**

**Females: Above the knee skirts or dresses with stockings, or dress pants. Runway shoes. Come completely prepared with hair and make-up done by using what you learned in your hair and make-up classes.**

**Males: Dress slacks or khakis, dressy shirts, or a button down shirt , (tie optional) and dress shoes.**

**\*\*\*\*\*Call or email to confirm your spot immediately, this is a one day event, there are no make up dates!!!!!! \*\*\*\*\***

Nigel;

[nigel@talentshowcase.tv](mailto:nigel@talentshowcase.tv)

(415) 293-7219



HOME

SEARCHING FOR

SUCCESSSES

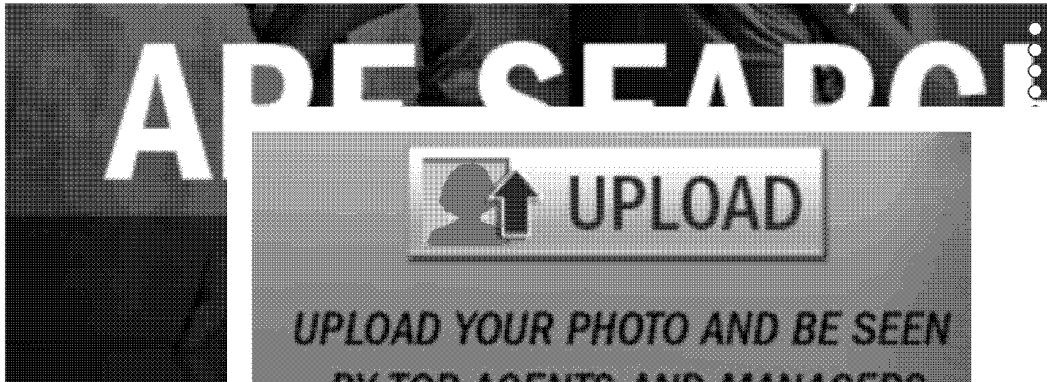
AGENTS&MANAGERS

ABOUT US

CONTACT

SEARCHING FOR: MODELS • ACTORS • SINGERS • DANCERS

VIDEOS



NAME  Age

SEARCHING FOR NEW TALENT IN:

oni

Get Discovered!

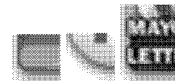
NAME  Age  ZIP  State:  PHONE  EMAIL

2/13/2016



For more information (888) 493-1923

INTERNATIONAL PERFORMING ARTS SHOWCASE  
 Headquartered at Los Angeles Center Studios  
 1201 West 6th Street, Suite T300  
 Los Angeles, CA 90017 | PRIVACY POLICY



 The International Performing Arts ...  
 Like Page 6.8K likes

International Performing Arts Academy is registered and has met the requirements set forth by the California Labor Commissioner and has posted a \$50,000 bond pursuant to Section 995.710 of the Civil Code Procedure. Surety Bond #57BSBG17017

CALIFORNIA BUSINESS AND PROFESSIONS CODE SECTION 22575-22579



**HOLLYWOOD AGENTS, MANAGERS & CASTING DIRECTORS  
ARE SEARCHING FOR YOU!**

**CALL FOR AN AUDITION (888) 493 1923**



*Call to learn more and set up an audition (888) 493-1923*

*Or set up your audition online.*

SEARCHING FOR: MODELS • ACTORS • SINGERS • DANCERS

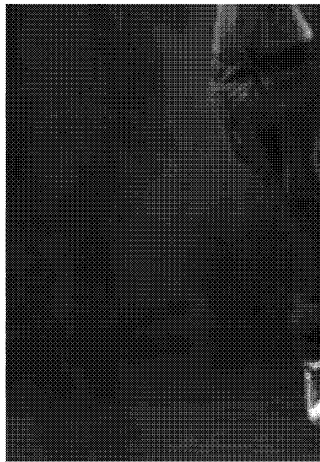


### Our Vision

We are and will remain the most innovative modeling and talent industry conference, constantly growing and shifting to serve the needs of our industry while maintaining the utmost levels of excellence and integrity.

CALL TO TRY OUT:

(888) 493-1923



### Our Mission

For our conference to serve as one of the largest networking and resource opportunities for industry professionals. To provide an exciting, professional, courteous and safe environment in which models and/or talent will be showcased. To create a win/win for all in attendance and within our network year-in and year-out.



SEARCHING FOR NEW TALENT IN:

exas - Nevada - Ohio - Washington - San Francisco - San Jose - California - Texas - Nevada - Or



For more information (888) 493-1923

INTERNATIONAL PERFORMING ARTS SHOWCASE  
Headquartered at Los Angeles Center Studios  
1201 West 5th Street, Suite T300  
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CALIFORNIA BUSINESS AND PROFESSIONS CODE SECTION 22575-22579



## International Performing Arts Showcase

Dear Parents and Students,

Welcome to today's exciting Try-Out!

It is our goal at Barbizon to provide each student with the opportunity to try-out for a leader in the entertainment industry, Ms. Kathleen Dewey, a Talent Scout for the International Performing Arts Showcase (IPAS).

Ms. Dewey will be meeting with you and your family at the appointment time you chose today. During your appointment, you will be viewing and receiving **your photo CD** and for those of you who have qualified for IPAS through the IPAS try-out, **you will make arrangements to take the next step in the industry.**

Parents are **REQUIRED** to be present at this appointment if you are **under 18** or living at home with your family.

You will receive a call regarding your IPAS try-out results, prior to **your appointment.**

Please make sure you and your family has fully read the entire packet and materials provided, today...after your try-out.

**This opportunity only happens once and we are excited and pleased to have Ms. Dewey here today.**

**GOOD LUCK TO ALL OF YOU!**

The Barbizon Education Department

**PLEASE NOTE:**

**IF YOU HAVE ANY QUESTIONS REGARDING YOUR APPOINTMENT TIME OR CONTENT... PLEASE CALL MS. KATHLEEN DEWEY DIRECTLY AT THE NUMBER BELOW, RATHER THAN BARBIZON.**

Ms. Kathleen Dewey  
(415) 902-5327

DAY SUN DATE 7-14 TIME 12:00 am/pm 8

# SHOWCASE

## Models & Talent

[www.talentshowcase.tv](http://www.talentshowcase.tv)

**Production Office**  
**1201 W 5th Street Suite T300**  
**Los Angeles, CA 90017**

[info@talentshowcase.tv](mailto:info@talentshowcase.tv)  
**(888) 493-1923**

# WINTER 2014

## HOLLYWOOD, CALIFORNIA, WINTER 2014

The International Performing Arts Showcase has announced its upcoming modeling and talent showcase in Los Angeles January 9, 2014 - January 12, 2014. If selected, you can qualify to represent the International Performing Arts Showcase at this exciting event by successfully completing the try-out with an official Showcase Talent Scout.

If selected, you will be traveling to Los Angeles to learn the latest in modeling, acting and talent techniques, how to market yourself in the industry, and all the in's and out's of the business from the leaders in this industry. You will also be showcased before the top modeling and talent agents, managers, casting directors, film directors/producers, record labels and industry professionals from the entertainment capital of the world, Hollywood.

You will meet and **interview** many of the industry's top professionals... models, actors, actresses as well as "behind the scenes" industry leaders through interesting and informative seminars and workshops.

You will meet, try-out for and **interview** with scores of modeling and talent agents and managers during this showcase that you would never have an opportunity to see otherwise. It is truly a once in a lifetime event for the potential model or talent. In just a few days, you will have achieved what would ordinarily take years of effort and tens of thousands of dollars!

Attached are the details of the showcase. Additionally, preparation workshops at the school to make sure you are ready to make the most of this opportunity. The staff will supervise all aspects of your preparation and assist you at the showcase. If you are under 18 years of age, a parent or guardian must accompany you on the trip. See special rates for parents and guests.

Please feel free to contact Showcase if you have any questions regarding your try-out results, preparation for the showcase, or information regarding your modeling or talent specialty. You will have your own showcase coordinator for your area should you need any assistance.

(888) 493-1923





## Your Showcase package includes:

- Your Showcase Registration Fees and Showcase Registration Badge
- Enrollment in five (5) Official Showcases/Auditions (based on selection by your Showcase talent scout)
- Showcase Seminars/Workshops Admittance: An educational experience with top names in fashion, acting and talent.
- Four (4) days and three (3) night's accommodations
- One (1) Ticket to the Red Carpet Gala
- One (1) Ticket to the Dance and Singing Finals Showcase
- Photo in the Model & Talent Directory
- Copy of the Model & Actors Directory
- One (1) Ticket to the formal Awards Dinner Banquet
- Entrance to "call back" room

### Plus These Special Showcase Custom Services:

- Personal counseling and representation during the showcase
- Management & Marketing services during and after the showcase
- Custom marketing and development program
- Workshops for Interview, Audition and "Go-See" day

• airfare/  
transportation  
• meals

## Pre-Showcase Training & Preparation:

TRAINING and PREPARATION for the showcase, including professional commercial and acting coaching, as well as specialized training for the individual showcases. This happens before you attend the showcase:

- Showcase Overview
- Getting the most out of your Showcase experience
- Imaging consultation
- Talent Showcase Selections
- Model Showcase Selections
- Mock Auditions
- Audition with Industry Professionals that will be at the showcase. Get feedback and critique on your audition.
- Wardrobe Selection Guidelines
- Fund-raising Workshop
- Showcase performance workshops (for modeling, acting, vocals and dancing)
- Professional Photographer will select photos for submission for print showcases. (Professional photo session complete with make-up artist and stylist)
- Headshot for the talent directory
- Commercial or High Fashion
- Post-showcase follow-up

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9/13

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- were are trainings
-

- Scholarships
- ~~extension for deposit~~



Showcase Pricing: Total Showcase Package Price for Participant \$5,995  
Participant pricing (based on quadruple room occupancy – per person)

Note: A deposit of \$1500 is required at the time of your personal meeting with your Showcase Talent Scout.

• Check ok?

Discounts apply if the entire package is paid in full at the time of your personal meeting.

Total Showcase Package Price for Parent/Guest \$1,995  
Parent/Guest Pricing (based on quadruple room occupancy – per person)

Note: A deposit of \$495 is required at the time of your interview

Discounts apply if the entire package is paid in full at the time of your **personal meeting**.

• Single occupancy available upon request for an additional charge (limited single occupancy available).

### PAYMENT POLICIES & DUE DATES

Your initial deposit to hold your place for the pre-showcase workshops and registration for the showcase is \$1500. This amount is due at the time of your enrollment. This deposit is deducted from the total price of \$ 5,995. Payments are due monthly.

*what are the payments*

### WHAT IS NOT INCLUDED IN THE PACKAGE PRICE?

Certain items are not included in the package price. They are 1) Composite cards, headshots, or laser prints to give to the modeling and talent agents. Composite cards are very beneficial as a marketing tool at the event IF you are competing in any print or fashion category. You will need to have the composite cards printed on your own. Showcase does not provide the cards. 2) Any personal items you may purchase at the showcase. 3) Meals, other than those specified. 4) Any item not specifically listed in the package shown earlier in this document.

• Can other parent attend only showcase

### PARENT/GUEST PRICING

The total package price for each parent/guest attending Showcase with his/her child/husband/wife/ etc. is \$1,995.

A \$495 deposit is due at the time of your appointment. Payments are due monthly.

Each parent/guest receives:

Full Showcase credentials • Showcase registration fee • Entry to all showcase seminars • Special parents' seminars and workshops • Entry to all open showcases • Awards banquet ticket • Hotel room charges (based on quadruple\* occupancy). Virtually everything a contestant does at the showcase... except compete!

- ~~must they stay~~
- will parent & child room together
- Total cost with new included items



## Top 10 Reasons to Attend the Showcase!

10

You will be in HOLLYWOOD, California: the Entertainment Capital of the World.

9

You will be **showcased** before the best talent agencies and management companies in HOLLYWOOD!

8

You will read for **casting directors**, producers and directors who are currently working in the industry.

7

You will be **exposed** to VIPs that you could only dream about!

6

You will meet and **learn from** the industry's best in the Showcase seminars and workshops.

5

You will be a part of the most exciting modeling and talent event in the world.

4

You will be exposed to the media.

3

You are eligible to win scholarships, prizes & more.

2

You could do what some of the industry's working models and talent have already done... be showcased at Showcase.

1

The #1 reason to be showcased at this event - You could be traveling the world as THE NEXT TOP MODEL or a STAR!

INTERNATIONAL PERFORMING ARTS  
**SHOWCASE**

## TALENT SHOWCASES

### Modeling Categories

(models must meet height and age requirement)

Fashion Runway

Fashion Print

Swimwear

TV Beauty Commercial

### Talent Categories

Singing

Dancing

Comedic Monologue

Dramatic Monologue

Television Commercials

Sitcom

Soap

Commercial Print

Which category?  
How do we decide?

• Do we do our own searching for scholarships



## Sponsorship Information:

The following is provided to answer your questions regarding securing sponsors for your Showcase trip. Remember that the Showcase experience is a once in a lifetime opportunity, and should be presented in that manner to potential sponsors. Complete sponsorship packets are available upon request.

### Who Can Be a Sponsor?

Sponsors can be anyone. Some examples are:

- Family (Parent, Grandparent, Cousin, Uncle, Aunt, etc). These are people who have your well-being and success in mind.
- Friends.
- People you **do business with** (examples are your doctor, dentist, orthodontist, insurance agent, both small (Local) **businesses** and large corporations are often willing to sponsor all or part of your showcase package.
- Your own **business**, if you are self employed or own a business.

### What Amount Can A Sponsor Provide?

Sponsors may provide **any amount** from \$10 to full sponsorship. Obviously, you want the largest sponsorship you can **get**, so **start out** at the upper end and work down if necessary.

You can offer to exchange work for the sponsorship. For example, you would do informal modeling for your sponsor if he/she were in a fashion business, if print advertising is used, your picture could be used in the advertisement. You could also handout advertising brochures or samples for their business.

If it would be beneficial to you, if local clothing stores provide one or more of your competition outfits or an item for you to raffle (this is also a form of sponsorship).

### What Does the Sponsor Receive?

In addition to any of the items listed above, sponsors contributing \$100 or more can receive a listing in the International Performing Arts Showcase directory. This book is given to all showcase participants, including the Model and Talent Agents who attend the showcase. This is a GREAT source of advertisement for a company, they can check with their accountant – this is most likely tax deductible!!

### What is a Sponsorship Packet?

Every Showcase contestant who is seeking sponsorship should make up your own personal PR packet. Your packet should look professional, and explain why you would like them to be on of your sponsors. Your packet should include: an Showcase sponsorship letter (Showcase will provide a professional copy for you), a brief note from you stating why you want to go to the showcase, stress your commitment to developing a professional career in fashion or entertainment world, your serious attitude and the fact that Showcase is offering you an opportunity to showcase your talent and learn about the business from experts; photographs of you (laser copies are fine); a sponsorship receipt that they can use for tax purpose (if applicable).

INTERNATIONAL PERFORMING ARTS  
**SHOWCASE**

### The Importance of Saying Thank You!

Companies, friend, families, and all others who contribute sponsorship money are showing you a great deal of support and belief in your talents and future successes. It is only proper to show your appreciation for this. Each company or person who sponsors you should receive a "thank you" note from you both now and after the competition is over.

The "thank you" note does not have to be long, just an expression of your appreciation. The notes you send now should express your excitement, and if you like, you can notify your sponsors of some of the events you are looking forward to, etc. The "thank you" notes after the showcase should express your thanks and appreciation again, and give each sponsor some insight on how you fared throughout the showcase.

Sending a "thank you" note is very simple and should only take a few minutes. However, it makes a positive, lasting impression on the recipient and that recipient will be even more supportive in the future in the meantime, keep up the great work!!!

#### Sample Letter

Dear Potential Sponsors:

Let me introduce \_\_\_\_\_, he/she is a model/talent and was selected by an official Showcase Talent scout to be showcased at International Performing Arts Showcase.

This is an opportunity to sponsor a model or talent to be showcased at the International Performing Arts Showcase, which takes place in January 9, 2014 - January 12, 2014, at The Millennium Biltmore Hotel, Los Angeles California.

Major modeling and talent agencies will see the models and talent that are selected to be showcased at this event from the United States as well as Europe and Asia. The discovery of many of the models and talent working in today's market were found at International Performing Arts Showcase!

Sponsors donating \$100.00 or more will be listed in the Official Showcase Directory, which is given to all participants and their families, agents, managers, casting directors and industry executives attending the event. This is a great advertising opportunity for you and may be tax deductible (check with your accountant) as an advertising expense.

Please accept our sincerest gratitude for helping this model/talent achieve their highest goals in the entertainment business.

Sincerely,

Zynn Jones

## Showcase Frequently Asked Questions:

Q. Why is someone selected for the Showcase?

A. Our Talent Scouts must feel the model or talent possesses the potential to be successful in the industry. Those accepted are placed in an elite group that auditioned successfully for fashion modeling, commercial modeling, TV commercials, television/film acting, singing and dancing, and they receive an evaluation of their talent.

Q. What are the chances of starting a career in the modeling or talent industry as a result of my participation in the Showcase?

A. It is the very best opportunity in this industry. Imagine having maximum exposure to scores of the industries "A" list watching you perform. Success is at its highest. It is up to the model or talent afterwards to follow through with the agencies and managers who are interested in them. Showcase staff, as well as your talent scout will assist with this.

Q. Will I have to change my educational plans in order to participate in this industry?

A. No one in the industry, including the Showcase or its scouts, modeling and talent agencies etc. want you to disrupt your education. Education always comes first. Agents will typically work around your school schedule, and will book you during summer, school breaks and holidays. The Showcase will assist you with scheduling.

Q. What will I learn from attending the Showcase?

A. The Showcase includes education in the modeling and talent industry. Seminars and workshops will provide you with invaluable insight into every segment of the industry; a task that would be impossible if you not participate. Experts in the industry conduct the workshops and seminars, observe the competitions, and meet with you throughout the weekend.

Q. Will I be prepared to make the most of this opportunity?

A. From this day forward, Showcase will provide you with the latest techniques and training for imaging, wardrobe, runway and photo shoots in addition to acting for TV Commercials, Soaps, and Sitcoms. You'll learn about the business side of being a model or talent including promoting yourself before and after competition. This training is customized to your needs. If you require additional help in preparing all you have to do is ask. Your degree of success depends on you!

*- When & where does this take place*

Q. Will I need a complete new wardrobe for the Showcase?

A. No. Showcase staff will assist you in selecting the best items for you, from your current wardrobe.



# Showcase Winter 2014, Tentative Hinerary:

## THURSDAY - January 9, 2014

8:00am - 11:00am	Registration
11:30am - 12:00pm	Orientation
12:00pm - 1:30pm	Acting Seminar: "How to Make it in Hollywood"
12:00pm - 5:00pm	Late Registration
2:00pm - 3:00pm	Agent/Manager Panel: Q&A "The Entertainment Biz"
3:00pm - 3:30pm	Parent Seminar I: "Children in Film"
4:00pm - 5:00pm	Acting Seminar: "Acting Technique"
5:00pm - 6:00pm	Parent Seminar II: "Support vs. Sabotage"
7:00pm - 10:00pm	LA Live: Conga Room - Launch Party

## FRIDAY - January 10, 2014

8:30am	City Morning Meeting
9:00am - 10:00am	Casting Seminar: "For the Actor, Dancer, & Model in You"
10:00am - 11:00am	Runway Seminar: "Fierce & Flawless"
11:00am - 5:30pm	Sitcoms, Soaps, Monologues, TV Commercials, TV Beauty
5:00pm - 6:15pm	Dance Showcase
6:15pm - 7:45pm	Sing Showcase
8:00pm - 10:30pm	Runway Party

## SATURDAY - January 11, 2014

8:30am	City Morning Meeting
9:00am - 10:00am	Music Seminar: "Don't Stop the Music"
9:30am - 2:30pm	Hair & Make-up
1:00pm - 1:30pm	Commercial Print
1:30pm - 2:00pm	Fashion Print
2:00pm - 3:45pm	Trendy Runway
3:45pm - 4:30pm	Fashion Runway
4:30pm - 5:15pm	Swimwear
5:30pm - 6:00pm	Model & Talent Overview
7:30pm - 8:30pm	Showcase • Agent & Manager Introduction
8:30pm - 12:00pm	Red Carpet Awards & Banquet Dinner

## SUNDAY - January 12, 2014

9:00am - 10:00am	Own Your Career: Moving Forward I
10:00am - 10:45am	Own Your Career: Moving Forward II
10:00am - 12:00pm	Callbacks - Invite Only
12:00pm - 1:00pm	Open Callbacks

THE ANIMATOR  
 OCEAN J...  
 F1000

- How many parent workshops?
- What do we do while child is in class?

(Tentative Itinerary: subject to change)

- She only attends workshops for her?
- How likely will she get a call back?
- What happens after showcase?

City of Los Angeles



June 1, 2013

International Performing Arts Showcase  
1201 W 5th Street T-300  
Los Angeles, CA 90017

Dear Friends,

On behalf of the City of Los Angeles, it is my pleasure to welcome and congratulate the members and guests attending the International Performing Arts Showcase.

I am pleased to join with other members of our community in recognizing Showcase's efforts to assist new talent in realizing their dreams and goals by creating an arena where they may want credible industry professionals to help in furthering their careers. I applaud and commend your vision and efforts in lighting a path for these young people.

I extend my best wishes for a memorable celebration and future success.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Antonio R. Villaraigosa'.

Antonio R. Villaraigosa  
Mayor

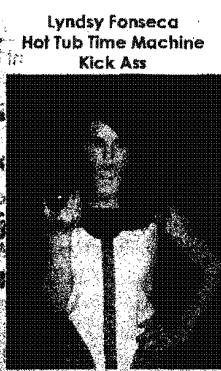
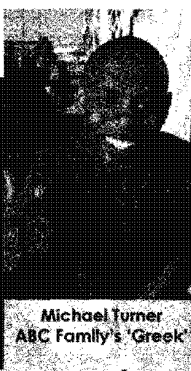
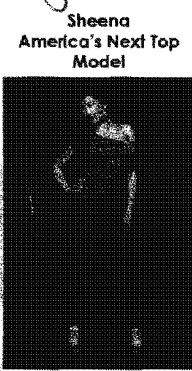
# WINTER 2014

## SHOWCASE

### Artist Talent Agreement

International Performing Arts Showcase is a talent training and counseling service providing a performing arts program. This program is intended to provide career counseling, vocational guidance and career evaluation through coaching, seminars, workshops and other similar training.

Artist Name: [Redacted] \$5995 Age: [Redacted] M Height: [Redacted]  
 Address: [Redacted] City: [Redacted] State: CA Zip: [Redacted]  
 Phone: [Redacted] Mobile Phone: [Redacted]  
 Email: [Redacted] Emergency Contact: [Redacted]  
 Registered Guest: Angelica Cosio Registered Guest: [Redacted] \$



Next Workshop Date: 7.20.13  
 Pre-Showcase Services • Preparation for Talent Showcase • Photoshoot

IPAS will provide the artist January 9 - 12, 2014:

- Hotel accommodations (quadruple occupancy)
- Performance in up to 5 showcases of the artist choice, provided you meet showcase requirements
- Scheduled meals
- Entrance to Industry Professionals (Agents and Managers) Seminars and Workshops throughout the event
- Headshot in IPAS Program Book distributed to Industry Professionals, Participants & Registered Guests
- Attendance at the Red Carpet Opening Night at LA LIVE!
- Dinner & Dancing at Awards Gala and Talent Showcase

Artist: \$ 5995 Guests: \$ 1995.00 Other: \$ Extra Room: \$

Total Fees: \$ 7990.00 Paid Today: \$ 1995.00 Record #

Balance of \$ 5995.00 to be paid in 5 monthly installment payments of \$ 1195.00

First installment payment due on 8/15/13 and every 15 of each month thereafter until paid in full. By signing on reverse of this document, I authorize International Performing Arts Showcase to automatically process payments by the method indicated below. Total participation fees must be paid in full by Dec. 1, 2013.

ACCT # Exp: SIC:

Card Holder S.S.#: D.L.#: Showcase Receipt #:

Special Instructions:



# The International Performing Arts Showcase

The 4-day event, located in Los Angeles, is the largest networking and resource opportunity for industry professionals- agents, managers, casting directors, choreographers and record executives.

Angelica Cosio

Parent or Legal Guardian Print (if artist is under 18)

*[Handwritten Signature]*

Parent or Legal Guardian Signature (if artist is under 18)

7, 14, 13

DATE

*[Redacted]*

Talent (Signature)

Julie Lawrence

IPAS Representative (Print)

*[Handwritten Signature]*

IPAS Representative (Signature)

International Performing Arts Showcase, PO Box 719, San Francisco CA 94104 Tel: (888) 493-1923

My signature is to make application for the International Performing Arts Showcase (IPAS), for participation at the IPAS Winter 2014 Event. The event is scheduled to take place in January 2014 at the Millennium Biltmore Hotel in Los Angeles, CA. This agreement becomes valid when accepted and executed by an IPAS representative. Upon execution of this agreement, I authorize payments to be made to International Performing Arts Showcase through ACH/EFT using the account information listed on the front side of this agreement. Returned/declined payments are subject to a twenty-five dollar service charge. INTERNATIONAL PERFORMING ARTS SHOWCASE IS A TALENT COUNSELING AND TRAINING SERVICE. THIS IS NOT A TALENT AGENCY CONTRACT. ONLY A TALENT AGENT LICENSED PURSUANT TO SECTION 1700.5 OF THE LABOR CODE MAY ENGAGE IN THE OCCUPATION OF PROCURING, OFFERING, OR ATTEMPTING TO PROCURE EMPLOYMENT OR ENGAGEMENTS FOR AN ARTIST. INTERNATIONAL PERFORMING ARTS SHOWCASE IS PROHIBITED BY LAW FROM OFFERING OR ATTEMPTING TO OBTAIN AUDITIONS OR EMPLOYMENT FOR YOU. IT MAY ONLY PROVIDE YOU WITH TRAINING. FOR MORE INFORMATION, CONSULT CHAPTER 4.5 (COMMENCING WITH SECTION 1701) OF PART 6 OF DIVISION 2 OF THE LABOR CODE. A DISPUTE ARISING OUT OF THE PERFORMANCE OF THE CONTRACT BY THE TALENT SERVICE THAT IS NOT RESOLVED TO THE SATISFACTION OF THE ARTIST SHOULD BE REFERRED TO A LOCAL CONSUMER AFFAIRS DEPARTMENT OR LOCAL LAW ENFORCEMENT, AS APPROPRIATE. YOUR RIGHT TO CANCEL: 7.14.13. You may cancel this contract and obtain a full refund, without penalty or obligation, if notice of cancellation is given, in writing, within 10 business days from the above date or the date on which you commence utilizing the services under contract, whichever is longer. For purposes of this section, business days are Monday through Friday. To cancel this contract, mail via certified mail with the USPS a signed and dated copy of the following cancellation notice or any other written notice of cancellation to International Performing Arts Showcase, PO Box 719, San Francisco CA 94104. NOT LATER THAN MIDNIGHT OF: 7.14.13. If you cancel, all fees you have paid must be refunded to you within 10 business days after delivery of the cancellation notice to the talent service. A refund may not be obtained after the 10-day cancellation period has expired. Effective withdrawal date is the postmark date. CANCELLATION NOTICE I hereby cancel this contract.

Artist Signature Dated: International Performing Arts Showcase is in compliance with applicable bond requirements. A bond in the amount of fifty thousand dollars (\$50,000) is held and is posted with the Labor Commissioner (Bond # 57BSBGI7017). Each Artist is provided with a copy of this contract and program dates before becoming obligated to pay any fee. This Participation Agreement represents the entire understanding between the parties respecting the services provided, and replaces and supersedes any and all oral or written understandings. No employee of IPAS or any other parties may modify or otherwise alter the terms of this agreement. You are entitled to an exact copy of this agreement. International Performing Arts Showcase reserves the right to change class dates and/or class times and/or venue in which the classes will take place because of difficulties beyond its control. We reserve the right to amend this contract as circumstances dictate provided no such amendment shall diminish the services provided. The first date of service commences with a photo shoot analysis with an IPAS Scout at no charge, with no obligation to pay. The second class commences with the date on reverse of this document. Any failure to take the classes shall not relieve the student/parent of the obligation of this contract. The student/parent agrees to pay any and all costs associated with the collection of any monies owed, or enforcing any rights hereunder in the event the buyer fails to pay the same. It is further agreed that the student/parent or legal guardian's rights under this agreement may not be assigned or transferred to any other person or student. The student/parent or guardian agrees to abide by the rules and regulations of this agreement. IPAS will include your image in the Program Book given to attending industry professionals. The registration fee does not include airfare, transportation to or from the airport, parking fees, room service, alcoholic beverages, food (other than offered at scheduled times), or additional hotel incidentals and sight-seeing excursions you wish to enjoy while in Los Angeles, CA. The International Performing Arts Showcase (IPAS) does not guarantee any income or employment as a result of attending this event. Talent may not bring guests that have not registered and been paid for, including hotel stay. ALL Talent under the age of 18 are required to bring a paid and registered guest (parent or guardian). If the Artist is 18 years or older and not registering a guest; IPAS will pair you with a talent of the same gender and demographic for double occupancy. Paid and registered guests will receive the following: hotel accommodations (shared with one IPAS Talent Participant) from January 9 - 12, 2014; scheduled meals; entrance to modeling and talent educational workshops and seminars throughout the event. Attend the Red Carpet Opening Night at LA LIVE!; Dinner & Dancing at Awards Gala and Talent Showcase.

# HOLLYWOOD SHOWCASE (HS)

*January 2014 Schedule*

## SACRAMENTO/STOCKTON #3

Always bring the following to training:

- ✓ Pen or Pencil
- ✓ Notebook
- ✓ Runway Shoes
- ✓ Scripts
- ✓ Singers and Dancers: Be prepared to perform at each class.

Dress Code:

Always have a fashionable style. Blue Jeans, Tennis Shoes, **Flip Flops are NOT allowed.**

<p align="center"><b>Showcase Training Time: 10:00am-4:00pm</b></p>
<p align="center">Saturday, July 20, 2013 Check-In: 9:30am <b>HYATT REGENCY SACRAMENTO</b> 1209 "L" Street, Sacramento, CA 95814 916.443.1234</p> <p align="center"><b>1<sup>ST</sup> PARENT/PARTICIPANT MEETING</b> 10:00am - 11:30am</p> <p align="center">Training: 11:30am - 4:00pm Please bring pen, paper and medical insurance</p>
<p align="center">Saturday August 17, 2013</p>
<p align="center">Saturday September 14, 2013</p>
<p align="center">Saturday October 12, 2013 Parent/Participant Informational Meeting <i>followed by lunch &amp; training</i></p>
<p align="center">Saturday November 9, 2013 <i>Singers &amp; Dancers - Showcase CD's are Due!</i> <i>(January 2014 Participant's Only!)</i></p>
<p align="center">Saturday December 14, 2013 <b>MOCK (January 2014 Participant's Only!)</b></p>

Zynn Jones, Showcase Director – Email: [zynn@talentshowcase.tv](mailto:zynn@talentshowcase.tv)

Mailing Address: 119 Pine Street #309, Seattle, WA 98101

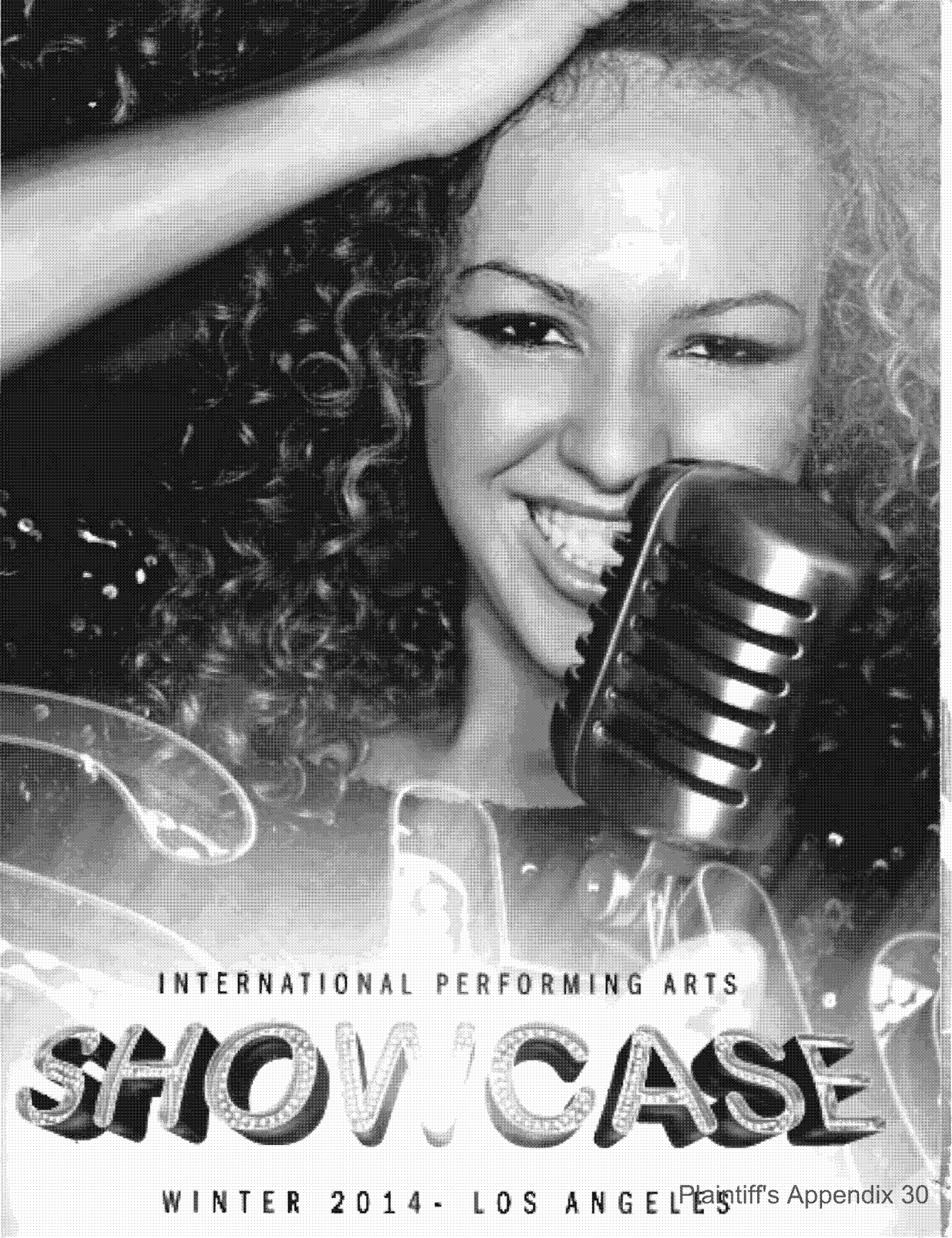
Hollywood Showcase - Thursday, January 9, 2014 – Sunday, January 12, 2014

Millennium Biltmore Hotel, 506 South Grand Ave., Los Angeles, CA 90071

Telephone #: 213.624.1022

*Dates & Times are subject to change.*





INTERNATIONAL PERFORMING ARTS

# SHOWCASE

WINTER 2014 - LOS ANGELES

Plaintiff's Appendix 30



## TABLE OF CONTENTS

- Showcases & Divisions 7
- Industry Professionals 8
- Models 18
- Talent 31
- Summer Pre-Registration 62
- Sponsors 63





# THE SHOWCASE

## OUR VISION

We offer the industry's most innovative modeling and talent showcase. We're committed to constant growth, ever adapting to serve the needs of our industry while maintaining the utmost levels of excellence and integrity.

## OUR MISSION

To serve as one of the largest networking and resource opportunities available for aspiring industry professionals; to provide an exciting, professional, courteous and safe environment in which models and/or talent will be showcased; and to create a win/win opportunity for all participants, year in and year out.

## ABOUT US

The International Performing Arts Showcase was founded to provide a venue for talented models, performers and others who are ready to meet industry professionals and pursue entertainment careers. Showcase talent directors hold nationwide auditions, searching for qualified talent to be invited to our showcase. This Los Angeles-based event hosts over 40 top professionals currently working with actors, singers, dancers and models. They collaborate closely with IPAS to ensure all participants receive the benefit of their experience and knowledge. Affiliated industry professionals are always seeking actors for upcoming films and pilots, models for runway shows, and backup singers and dancers for concerts, among other performing talent.



# SHOWCASE 2014

Welcome to the International Performing Arts Showcase 2014. We're excited to share this special moment with you.

We're here to experience performance, develop our craft, grow our professional skills and have a lot of fun. Professionals from the worlds of modeling, acting, singing and dancing will be joining us to see our talent. Several of these industry guests will be sharing their wisdom and experience in educational seminars available only at Showcase.

We've heard countless stories of graduates returning to their home towns with new insight and confidence – and we look forward to hearing yours as well. Many Showcase alumni have gone on to build substantial careers in entertainment.

Please say hello to us while you're here. We want to know your thoughts, now and after the event. Like an entertainment-industry career, Showcase is always evolving with the shifting needs of the individual and the marketplace.

We wish you nothing less than the fulfillment of your dreams.

*Showcase Advisory Board & Staff*

# City of Los Angeles



June 1, 2013

Hollywood Showcase  
1201 W 5th Street T-300  
Los Angeles, CA 90017

Dear Friends,

On behalf of the City of Los Angeles, it is my pleasure to welcome and congratulate the members and guests attending the Hollywood Showcase.

I am pleased to join with other members of our community in recognizing Showcase's efforts to assist new talent in realizing their dreams and goals by creating an arena where they may want credible industry professionals to help in furthering their careers. I applaud and commend your vision and efforts in lighting a path for these young people.

I extend my best wishes for a memorable celebration and future success.

Very truly yours,

Antonio R. Villaraigosa  
Mayor



LYNDSY FONSECA  
*Discovered*



- NIKITA



# CATEGORIES

## FEMALE MODEL DIVISION CATEGORIES

DIVISION	AGE RANGE	HEIGHT	DESCRIPTION
M1	18-23	5'8 AND OVER	FEMALE MODEL
M2	16-17	5'7" AND OVER	FEMALE TEEN MODEL
M3	13-15	5'6" AND OVER	FEMALE YOUNG TEEN MODEL
M4	UP TO AGE 12	ALL HEIGHTS	FEMALE PRETEEN MODEL

## MALE MODEL DIVISION CATEGORIES

DIVISION	AGE RANGE	HEIGHT	DESCRIPTION
M5	18 - 28	5' 11" +	MALE YOUNG ADULT MODEL
M6	13 - 17	ALL HEIGHTS	MALE TEEN MODEL
M7	UP TO AGE 12	ALL HEIGHTS	MALE PRETEEN MODEL

## FEMALE TALENT DIVISION CATEGORIES

DIVISION	AGE RANGE	HEIGHT	DESCRIPTION
T2	18 & OVER	ALL HEIGHTS	FEMALE YOUNG ADULT ACTOR
T3	16 - 17	ALL HEIGHTS	FEMALE TEEN ACTOR
T4	13 - 15	ALL HEIGHTS	FEMALE YOUNG TEEN ACTOR
T5	6 - 12	ALL HEIGHTS	FEMALE PRE-TEEN ACTOR

## MALE TALENT DIVISION CATEGORIES

DIVISION	AGE RANGE	HEIGHT	DESCRIPTION
T6	18 & OVER	ALL HEIGHTS	MALE ADULT ACTOR
T7	16 - 17	ALL HEIGHTS	MALE YOUNG ADULT ACTOR
T8	13 - 15	ALL HEIGHTS	MALE TEEN ACTOR
T9	6 - 12	ALL HEIGHTS	MALE PRETEEN ACTOR

### MODEL SHOWCASES

FASHION RUNWAY · SWIMWEAR  
FASHION PRINT · TV COMMERCIAL  
BEAUTY

### TALENT SHOWCASE

DANCERS · SINGERS · TV COMMERCIAL  
MONOLOGUE · SITCOM · COMMERCIAL  
PRINT · TRENDY RUNWAY



## SHOWCASE SPEAKERS

*Industry Professionals*

### **MONTRÉ BURTON**

#### **Acting Seminar: "Acting Technique"**

Thursday, January 9, 2014 12:00pm-1:00pm



Actor, Host, and Producer Montré had his big breakout in Disney's *High School Musical: Get in the Picture* on ABC. Montré starred as a co-host/faculty member who helps mentor, challenge, encourage, and nurture the contestants, much like he does with young artists around the country, equipping them with the tools to be successful in the entertainment industry. Previously, Montré guest starred on HBO's *Entourage*, My TV Network's *Wicked Wicked Games*, FX's *It's Always Sunny in Philadelphia*; starred in *Dormant* at the Los Angeles Jewish Theatre, *Sleepwalk* at the historic Ford Theatre in Los Angeles; appeared in national commercials for Dominos, Chrysler, Snapple, Burger King, McDonalds, ABC, E! Entertainment Television and in the independent features *Free Samples*, *The Company We Keep*, and *All The Days Before Tomorrow*.

### **SCOTT SEDITA**

#### **Acting Seminar: "How to Make it in Hollywood"**

Thursday, January 9, 2014 1:00pm - 2:00pm

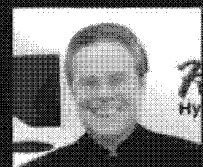


Scott Sedita is a well respected, highly in-demand acting coach, motivational speaker and author. Recently, Scott was seen in the Showtime series "La La Land" and the VH1 reality series "New York Goes To Hollywood." In the past, he's starred in the E! show "Fight For Fame," USA Network's "Character Fantasy," Fox Sports Network's "Helmets Off," MTV's "Adventures In Hollywood" and Bravo's "Faking It." Scott is also the author of the best-selling books "The Eight Characters of Comedy, A Guide to Sitcom Acting and Writing" and "Scott Sedita's Guide To Making It In Hollywood. 3 Steps to Success. 3 Steps to Failure." Scott has more than 25 years of experience in the entertainment industry; he began his career in New York as a talent agent, where he helped to launch the careers of many of today's top stars, including Courteney Cox, Matt LeBlanc, Christopher Meloni, and others. In 1990, Scott relocated to LA where he has worked with many of today's top stars, including Emma Roberts, 50 Cent, Josh Duhamel, Chace Crawford, Paula Abdul and has taught many hot new actors who have become regulars on such shows as "Gossip Girl," "90210," "Pretty Little Liars," "True Blood," "Grey's Anatomy," "Weeds," "Chuck," "Teen Wolf," "The Secret Life of An American Teenager" and "Zeke and Luther" to name a few.

### **PAUL CAPLAN-BENNETT**

#### **The Entertainment Biz: "Agents & Managers Q&A"**

Thursday, January 9, 2014 2:30pm - 3:30pm



In 1995 Paul Bennett formed his own talent management/production company, PB Management. His clients have appeared in numerous television shows and films. He is involved in developing several projects under consideration by networks, studios and production companies, including a first look deal with HBO. Paul has been listed in *Who's Who In the West*. He has received commendations from the Governor of Florida, the Mayor of Los Angeles and numerous non-profit organizations for outstanding work in helping many charitable causes. Paul served as the President Emeritus of the Talent Managers Association from 2003-2007 and was twice awarded the Seymour Heller Award as Talent Manager of the Year.

## SHOWCASE SPEAKERS

*Industry Professionals*

### ***The Entertainment Biz: "Agents & Managers Q&A"***

**MILTON PEREA**



Milton Perea has been actively involved in the entertainment industry for more than ten years and a leading talent agent with Amsel, Eisenstadt & Frazier, Inc. His clients are series regulars on such shows as: ABC Family's Jane by Design, NBC's Parenthood, Steven Spielberg & Diablo Cody's Showtime series United States of Tara, AMC's Mad Men, NBC's Days of Our Lives, ABC's Once Upon a Time, and General Hospital. Many of his clients have guest starred and have recurring roles on shows like Disney's Shake It Up, Lab Rats, Ant Farm, Austin & Ally, So Random, Nickelodeon's Victorious, Fox's Bones, CW's 90210, and many, many more.

### ***The Entertainment Biz: "Agents & Managers Q&A"***

**MARA SANTINO**

Mara has cultivated the careers of many young actors and loves to scout new talent. She has put many of her clients on Disney and Nickelodeon shows. Some of her clients include Davis Cleveland who stars as "Flynn" on Disney's hit show, Shake It Up and Bianca Santos who plays Lexi on THE FOSTERS, and who just booked the lead in her new television series HAPPYLAND. Other clients include: Brigid Fleming who is starring with Kate Winslet, Josh Brolin & Tobey Maguire in the upcoming feature Labor Day, Brock Kelly who plays Zack Springer on RAVENSWOOD, Riley Voelkel (AMERICAN HORROR STORY and THE NEWSROOM), Andrew Gray as Troy Burrows in THE RED Megaforce POWER RANGER, Elizabeth De Razzo who plays Maria on the HBO Series EASTBOUND & DOWN, and Jesse Cave who played Lavender Brown in the Harry Potter films. Mara put a once unknown actor, Chord Overstreet, on one of Fox's top rated shows, Glee, in the role of Sam Evans.



### ***The Entertainment Biz: "Agents & Managers Q&A"***

**LUCCIANO BERNINGSON**

Lucciano Berningson is the Founder and Agency Director of Industry Creative, a full service production agency with offices located in San Francisco and Chicago. Lucciano has over 10 years of industry experience working with top television networks and commercial print clients such as MTV, CW, VH1, Bravo, ABC, NBC GAP, Seventeen and Polo to name a few. Lucciano travels the nation educating, casting and scouting potential talent to become the industry's next superstars. Industry Creative credits include casting movies such as Pirates Of the Caribbean starring Johnny Dep, The Punisher starring John Travolta, Daddy Day Care starring Eddie Murphy, Bad Boys starring Will Smith & Martin Lawrence and Too Fast Too Furious starring Vin Diesel. Lucciano also currently casts for a number of hit reality shows which have included Americas Next Top Model, Shot at Love, Big Brother, Paris Hiltons' BFF and many more.





## SHOWCASE SPEAKERS

*Industry Professionals*

### PAUL TRUSIK

#### *The Entertainment Biz: "Agents & Managers Q&A"*



Paul owns and operates Los Angeles based Trusik Talent Management, a firm that guides and cultivates the careers of young adult and adult actors. He is a Past President of the TMA Talent Managers Association, the national trade group of professional managers and producers of the annual "TMA Heller Awards", a ceremony attended by Casting Directors, Agents & Managers in Hollywood. He is an Emmy voting member of The Academy of Television Arts and Sciences (ATAS) and a Spirit Awards voting member of Film Independent (presenters of the Spirit Awards and LA Film Festival). Paul's clients have appeared in numerous television shows, films, print campaigns and commercials. Upcoming 2014 feature films include Disney's 'McFarland' w/Kevin Costner and 'The Trials of Kate McCullough' with Kate Beckinsale. TV includes Castle, NCIS:LA, The Bridge, American Horror Story, CSI, True Blood, Justified, Bones and The Mentalist to name a few.

### TONI CASALA

#### *Children in Film*

*Thursday, January 9, 2014 4:15pm - 4:45pm*



Toni opened Casala, Ltd. in 1994. A niche agency for studio teachers, Casala, Ltd thrived and a decade later positioned Toni as one of Hollywood's leading authorities on California Child Labor Law. But, Toni saw a need for more and thus ChildrenInFilm.com was born. Initially, CIF was created to provide labor law information and work permit services, but has since evolved into an entire resource and networking site for parents of talent as well as industry professionals. Toni has provided professional services and legal expertise to The Walt Disney Company, Warner Brothers, Fox Broadcasting, Mattel Toys and many more. Over the years, her office has provided on set education and/or permit services for celebrities such as Jennifer Love Hewitt, Hillary Duff, and Milla Jovovich, Abigail & Spencer Breslin, Kiki Palmer, David Archuleta and many more.

### BONNIE VENTIS

#### *Parent Seminar: "Support vs. Sabotage"*

*Thursday, January 9, 2014 4:45pm - 5:45pm*



Bonnie Ventis has a passion for finding and developing new talent. She has more than twenty five years in the entertainment industry and working with young people's careers is a testament to that passion. She has seen many clients grow up in the industry and become healthy and happy adults. Current clients can be seen on the big screen in the popular films "Casa De Mi Padre", "Hangover 2", "Prom", "Secretariat", "Footloose", and soon, the hugely anticipated "Ender's Game". On the small screen her clients are series regulars in "Austin & Ally", and the hugely successful ABC comedy "Modern Family". Many clients have recurring roles on "Victorious", "90210", "I'm With the Band", "True Blood" and the soap opera "Days of our Lives". Bonnie's knowledge and expertise in developing new talent, building and maintaining a career in the entertainment industry has led to the success of many young actors.

## SHOWCASE SPEAKERS

*Industry Professionals*

### **Parent Seminar: "Support vs. Sabotage"**

**PATRICK BACA**

Patrick Baca brings a unique perspective to his current career as a Casting Director, having previously been an actor, talent agent and talent manager – all in that order. In 1987, Patrick starred in the Academy Award nominated feature film, *Stand and Deliver* with Edward James Olmos, Andy Garcia and Lou Diamond Phillips. Prior to his transition into casting, Patrick owned a management company for actors and became known for scouting and launching young talent. A few of his management and casting discoveries include Seann William Scott, Amy Acker, Jamie Alexander (Kyle XY), singer Christina Milian and Brandon Routh – star of *Superman Returns*.



### **Parent Seminar: "Support vs. Sabotage"**

**LIMA BERGMANN**

Lima Bergmann is a psychologist in the Los Angeles area. She and her family relocated from the San Francisco Bay Area to Los Angeles when her daughter, Lyndsy was offered a role on *The Young and Restless*. Lima actively managed her two daughters' acting careers. Lyndsy has appeared in numerous commercials and TV shows, including *Malcolm in the Middle*, *Heroes*, *NYPD Blue*, *CSI*, *Big Love*, *How I Met Your Mother*, *House M.D.*, and was a season regular on *Desperate Housewives*. She has also appeared in a supporting role in several movies, including *Hot Tub Time Machine* and *Kick Ass*. Her most recent, notable role is Alexandra "Alex" Udinov on CW's hit show, *Nikita*, now in its third season. Lyndsy's little sister, Hannah, has followed in her sister's footsteps with appearances on *Will and Grace*, *Boston Legal*, *The Suite Life of Zack and Cody*, *Bones*, *Without a Trace* and has a recurring role on Disney XD's "Kickin' It". She can next be seen as Darby on an upcoming episode of *Body of Proof*. Hannah has also appeared in two movies and has done voice over work, including a *Charlie Brown Christmas Special*. Lyndsy and Hannah are favorites among the past International Performing Arts Showcase successes!



### **Parent Seminar: "Support vs. Sabotage"**

**REID DWORKIN**

Reid Dworkin is an attorney at a law firm in the Los Angeles area. He and his wife, Lima, relocated from the San Francisco Bay Area to Los Angeles when their daughter Lyndsy was offered a role on *The Young and Restless*. Both Reid and Lima manage their two daughters' acting careers. Lyndsy has appeared in numerous commercials and TV shows, including *Malcolm in the Middle*, *Heroes*, *NYPD Blue*, *CSI*, *Big Love*, *How I Met Your Mother*, *House M.D.*, and was a season regular on *Desperate Housewives*. She has also appeared in a supporting role in several movies, including *Hot Tub Time Machine* and *Kick Ass*. Her most recent, notable role is Alexandra "Alex" Udinov on CW's hit show, *Nikita*. Lyndsy's little sister, Hannah, has followed in her sister's footsteps with appearances on *Will and Grace*, *Boston Legal*, *The Suite Life of Zack and Cody*, *Bones*, *Without a Trace* and has a recurring role on Disney XD's "Kickin' It". Hannah has also appeared in two movies and has done voice over work, including a *Charlie Brown Christmas Special*. Lyndsy and Hannah are favorites among the past International Performing Arts Showcase successes!





## SHOWCASE SPEAKERS

*Industry Professionals*

### ANNET MCCROSKEY

**Parent Seminar: "Support vs. Sabotage"**

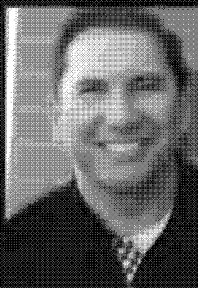


As the 2013 Manager of the Year, Annet has a true passion for guiding young talent and taught acting at The Young Actors Studio and The Studio For Young Actors. In 2004, she started managing child actors under the name Little Stars Management. As her teen and adult roster grew, the company name was changed to Artistic Endeavors in late 2007. Annet is grateful to have combined her love of acting with her strong business sense by becoming a Personal Talent Manager. Artistic Endeavors is currently expanding into development and production as well as music management.

### TONY GONZALES

**For the Actor, Dancer, and Model in You**

*Friday, January 10, 2014 9:30am-10:30am*



Tony G is one of the most established choreographers and casting directors in dance, film, television, music videos, and commercials. His work encompasses all styles of dance including hip-hop, jazz, contemporary, street funk and more. Tony is the choreographer for "Kidz Bop," acting as the artistic director for their commercials, music videos and live performances as well as choreographer for such hit television series as Mike & Molly, Community, I Hate My Teenage Daughter, Up All Night and The Office. Tony's other credits include Little Fockers, Despicable Me, the franchise movies Bring It On and three Wii/Nintendo games "All Star Cheer Squad." He has also choreographed for the NBA, NFL and collegiate cheer and dance teams across the globe for the last 18 years, including the Laker Girls, Charger Girls and Clipper Spirit. His commercial work includes top brands such as Verizon, Target and Safeway.

### DAMON SHARPE

**Music Seminar: "Don't Stop the Music"**

*Saturday, January 11, 2014 9:00am-10:00am*

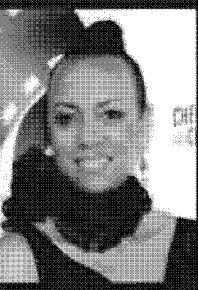


Damon Sharpe is an award-winning record producer and songwriter in Los Angeles. He has contributed many recognizable songs to popular culture and has been involved with the production of various popular albums that cumulatively have sold over 35 million copies. He has worked with various contemporary artists such as Jennifer Lopez, Kelly Rowland, Big Time Rush, New Boyz, Ginuwine, Amerie, 98 Degrees, American Idol's Kimberley Locke and Justin Guarini, Natalie Cole, Corbin Bleu and many others. In 2005 he released the Hurricane Katrina Relief record "Come Together Now" written with actress Sharon Stone and featuring contributions from Celine Dion, Nick Carter, Joss Stone, Jesse McCartney, Patti LaBelle, Wyclef Jean, Chingy, Gavin DeGraw, Anthony Hamilton, The Game, JoJo, John Legend, Kimberley Locke, Natalie Cole, Brian McKnight, AJ McLean, Mya, Aaron Carter, Stacie Orrico, Kelly Price, and Ruben Studdard. He also appeared on season 2 of The X Factor as one of the on camera vocal coaches.

### SANDI BASS

**Runway Seminar: "Fierce and Flawless"**

*Saturday, January 11, 2014 10:00am-11:00am*



Sandi was discovered by Monsieur Hubert de Givenchy and taken to Paris, France as his muse... This historical, "Girls of Color Cabine" that took Paris by storm was on the heels of the Versailles Show with Bethann Hardison, Pat Cleveland honoring designers Halston and Stephan Burrows. Sandi spent the next fifteen years as a top runway model living in Paris, Rome, and Tokyo working for top designers, Valentino, Christian Dior, Emanuel Ungaro, Karl Lagerfeld, Fendi, and the list goes on. Sandi is now on the other side of the modeling industry. With experience working as Director of Runway at a top NY agency and traveling the world as a top international model scout placing models in Asia, Europe, US and Canada.

# SHOWCASE WORKSHOPS & COACHING

The International Performing Arts Training Program has a uniquely crafted workshop curriculum. Our mission is to develop our students into confident, poised and polished young men and women equipped to succeed in any industry they choose to pursue. In conjunction with mentorship, our courses are evaluated and modified by industry professionals. The Showcase Advisory Board is a selected group of agents, managers and casting directors that are licensed by the state of California, have a long standing and reputable client list and are looking to nourish the new crop of young talent in building longevity in this exciting industry.

## SHOWCASE ADVISORY BOARD

### **BONNIE VENTIS** - Clear Talent Group

Her clients can be seen on: HBO's Big Love, WB's One Tree Hill, Nickelodeon's iCarly, ABC's Modern Family, ER, Studio 60 on the Sunset Strip, Weeds, My Name is Earl, Hannah Montana and The Suite Life of Zach and Cody. As well as feature films such as Napoleon Dynamite, Sky High, Click, Meet the Fockers, Crank, Employee of the Month, Transformers and Paul Blart: Mall Cop.

### **PAUL CAPLAN BENNETT** - Talent Managers Association

In 1995 Paul Bennett formed his own talent management/production company, PB Management. His clients have appeared in numerous television shows and films. He is involved in developing many projects under consideration by networks, studios and production companies, including a first look deal with HBO. Paul was the President Emeritus of the Talent Managers Association from 2003-2007.

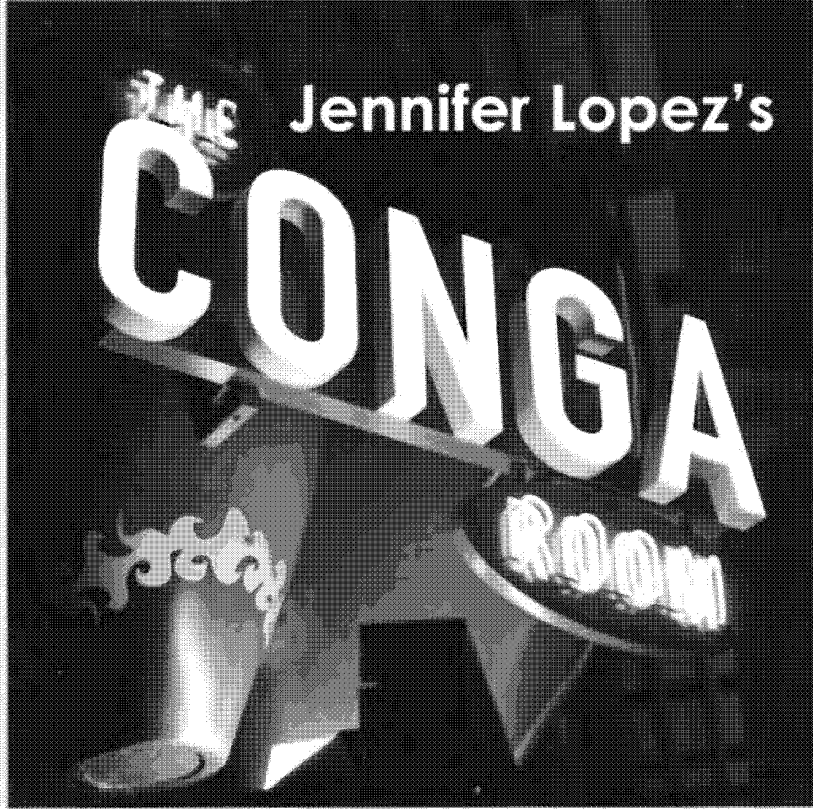
Don't miss Paul in The Entertainment Biz seminar!

### **LUCCIANO BERNINGSON** - 415 Industry Creative

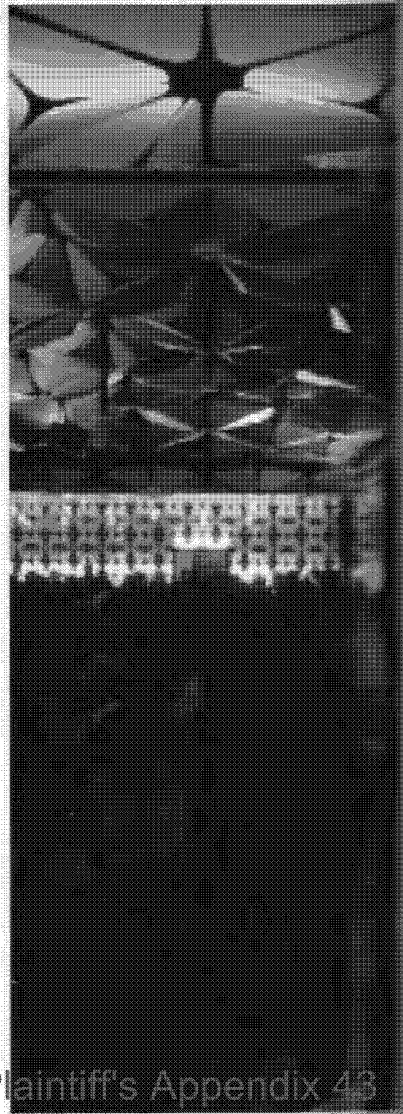
Lucciano Berningson is the Founder and Agency Director of Industry Creative, a full service production agency with offices in San Francisco and Chicago. Lucciano has over 10 years of industry experience working with top television networks and commercial print clients such as MTV, CW, VH1, Bravo, ABC, NBC GAP, Seventeen and Polo. Lucciano travels the nation educating, casting and scouting the industry's next superstars. Industry Creative credits include movies such as Pirates Of the Caribbean, The Punisher, Daddy Day Care, Bad Boys, and Too Fast Too Furious.

Don't miss Lucciano in The Entertainment Biz seminar!





Having swept onto the L.A. social scene in 1998, the Conga Room earned a following with its hip ambiance and hot performers. It hosts record launches, movie debuts, award shows and parties, including the 2001 Latin Grammy Award Presentation. The world famous Conga Room was founded by real estate entrepreneur Brad Gluckstein and co-owned by Jimmy Smits, Jennifer Lopez, Paul Rodriguez, Sheila E., Amaury Nolasco, Baron Davis, Trevor Ariza, and Will.i.am. The Conga Room is part of L.A. LIVE, the new downtown entertainment district, offering a significantly larger, more sophisticated destination for loyal patrons and all those seeking an exciting, authentic Latin sabor.



# SHOWCASE

## HEADQUARTERS LOS ANGELES CENTER STUDIOS



Just west of downtown Los Angeles, LACS is a supportive, synergistic environment that has created a dynamic community for individuals in the film, television, music, gaming and other creative industries.

Showcase students are exposed to over 450,000 square feet of "Class A" production office space, six state of the art sound stages, a back lot with numerous practical locations and a full range of services and amenities available on-site.



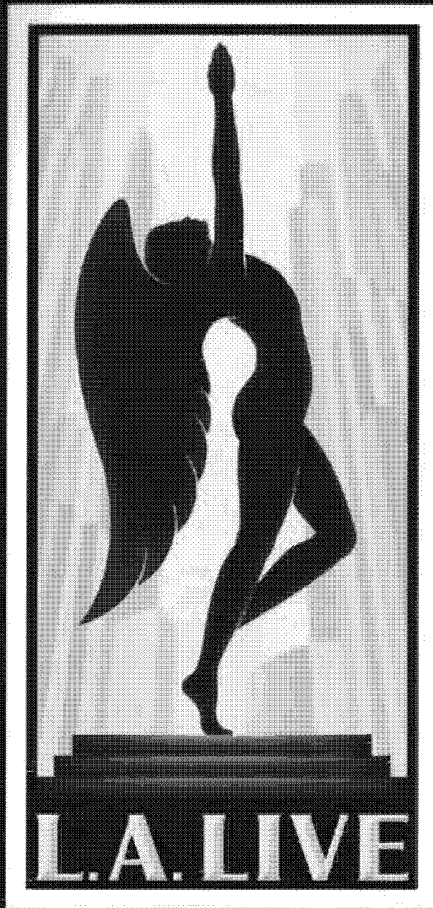
# THE MILLENNIUM BILTMORE HOTEL

HOME OF THE INTERNATIONAL  
PERFORMING ARTS SHOWCASE

Since 1923 the historic Millennium Biltmore Hotel has stood as a symbol of the city, with a rich history and a reputation for fine hospitality that continues into the 21st century. The hotel has welcomed US Presidents, royalty, international dignitaries, celebrities and world travelers for over 85 years and is probably best known as the "Home of Oscar." The Academy of Motion Pictures Arts & Sciences was founded in the Crystal Ballroom in 1927 and eight subsequent Oscar banquets during the 30's and 40's. In 1964, The Beatles sought refuge from screaming fans in the Biltmore's Presidential Suite during their first world tour. And in 1960, John F. Kennedy ran for the Democratic Presidential ticket from his headquarters in the Music Room (now the Lobby). Even now the Biltmore's incomparable ballrooms play host to some of the city's most high-profile events and social functions.

The hotel's beauty also continues to attract the eye of Hollywood, who has used it in feature films such as *Ghostbusters*, *Bugsy*, *Chinatown*, *Ocean's 11*, *The Italian Job*, *King Kong* and countless others, as well as television series like *Heroes*, *Entourage*, *CSI: New York*, *Boston Legal* and *Alias*.

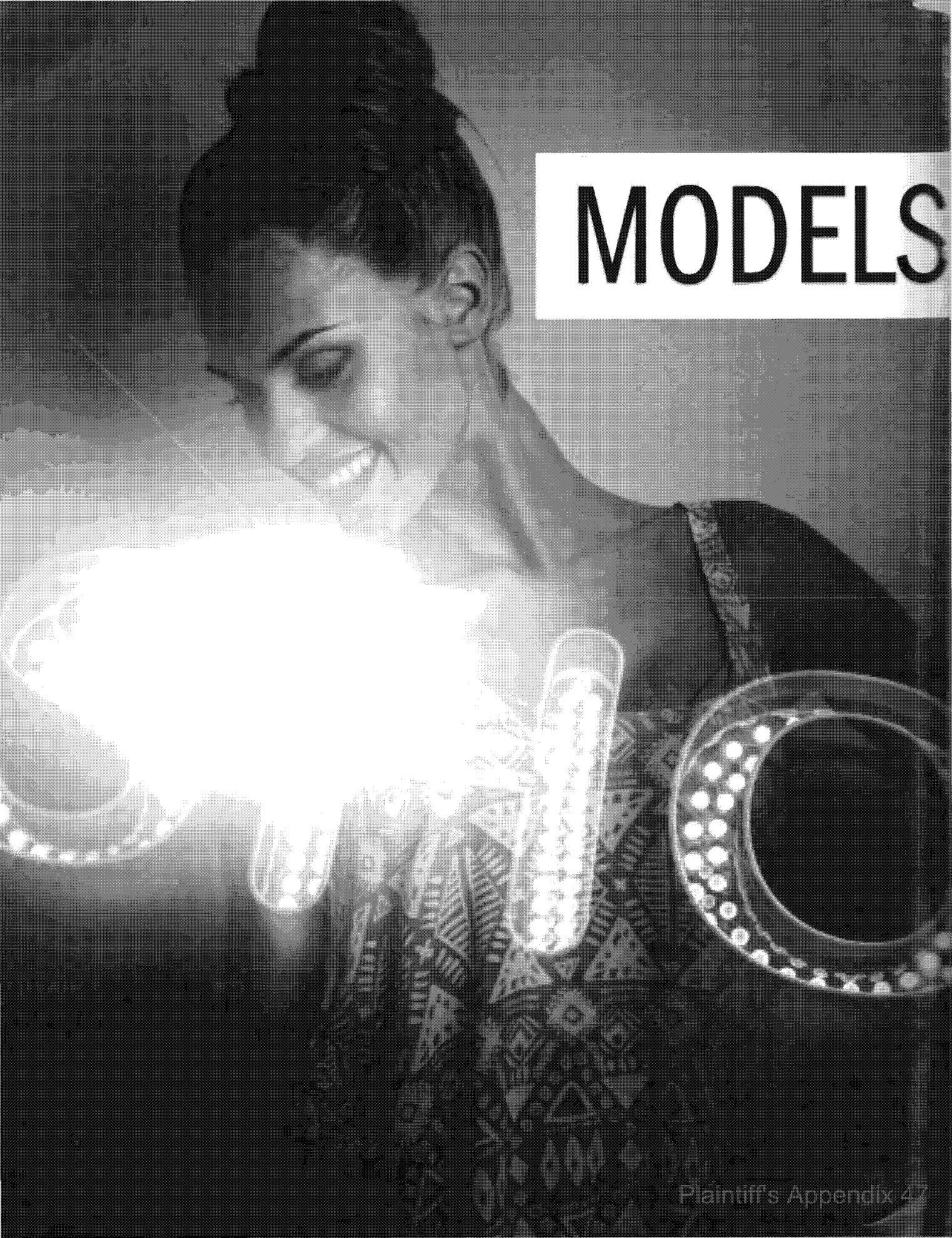




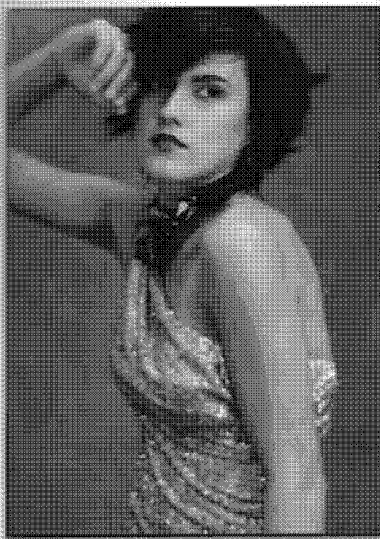
L.A. LIVE is in the heart of the city synonymous with entertainment, offering the most exciting selection of event venues. Home to STAPLES Center, Nokia Theatre L.A. LIVE, Club Nokia and the GRAMMY® Museum. L.A. LIVE is where L.A. comes alive with the best in music, entertainment, sports and events. With 20 restaurants, bowling, a 14-screen cinema and two luxury hotels. L.A. LIVE is the place to dine, play and stay in Los Angeles.







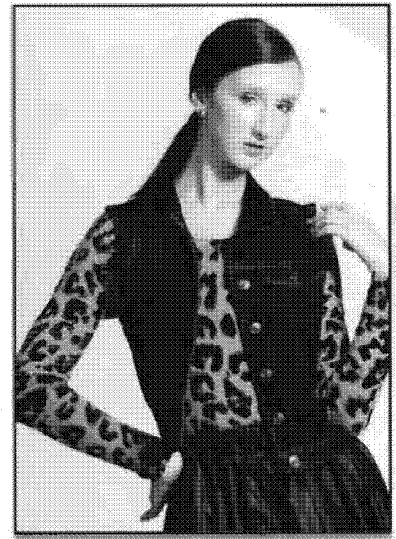
# MODELS



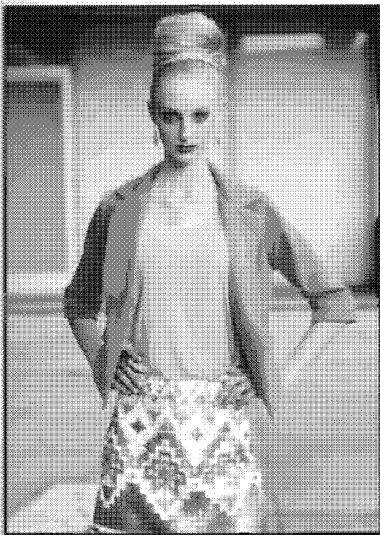
1102 T2 M1  
Madison Creese 17 6'2



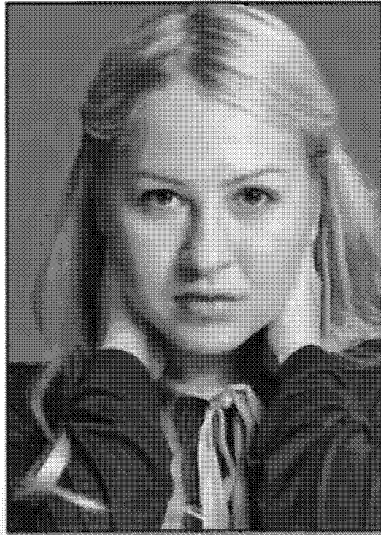
1103 T2 M1  
Clarrisa Lopez 18 5'9



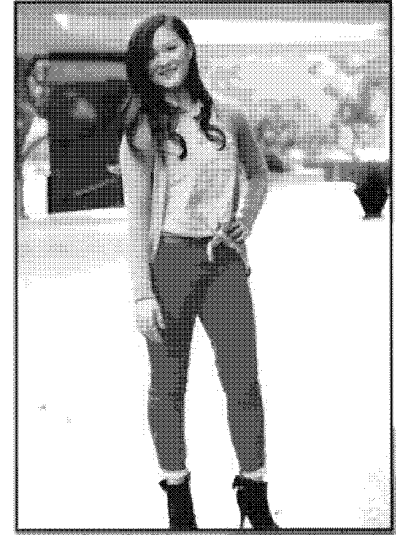
1104 T2 M1  
Samantha Parquette 18 5'8



1105 T2 M1  
Melanie Williams 18 5'9



1106 T2 M1  
Olena Shapoval 28 5'7



1107 T2 M1  
Winnie Sun 18 5'7

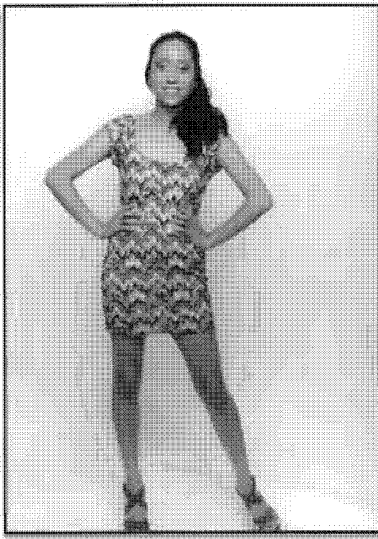


1108 T2 M1  
Cassie Shaw 18 5'8

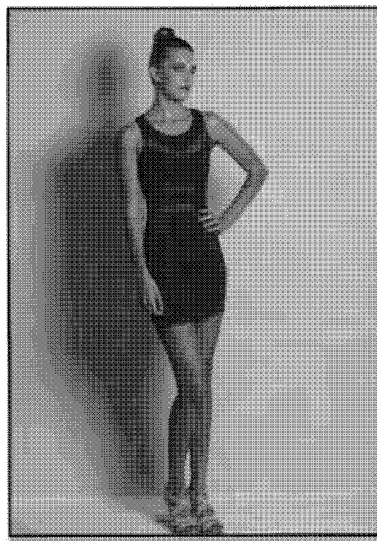


1109 T2 M1  
Clarice Kasa 18 5'11

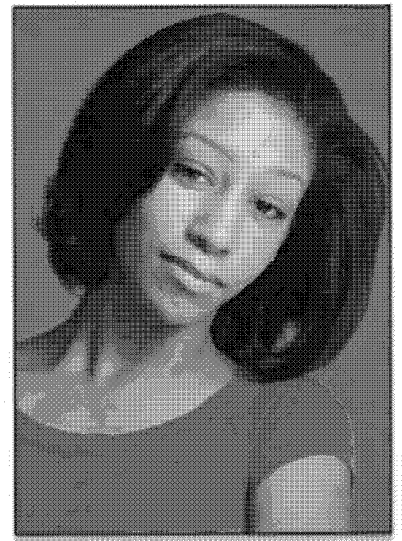




1112 T2 M1  
Ana Angel 18 5'8



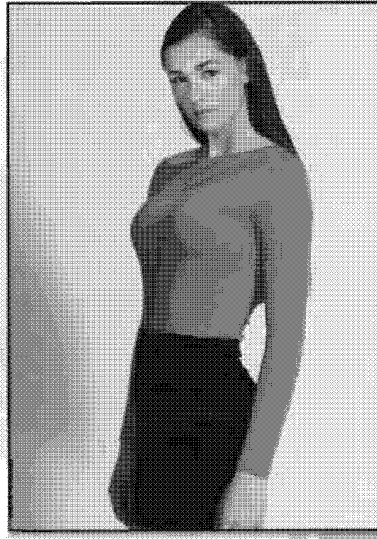
1201 T3 M2  
Kristen Madigan 17 5'11



1202 T3 M2  
Shelby Harris 16 5'8



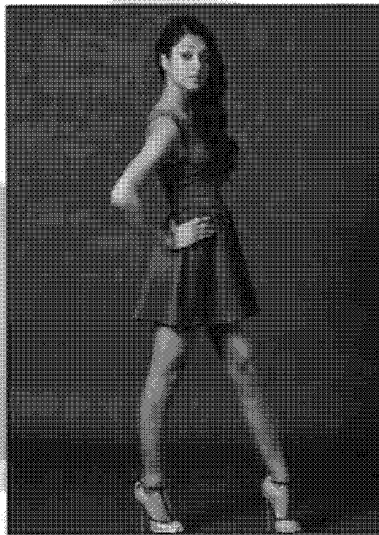
1203 T3 M2  
Krista Dias 17 5'9



1206 T3 M2  
Emily Hise 16 6'1



1208 T3 M2  
Victoria Alvarado 17 5'8



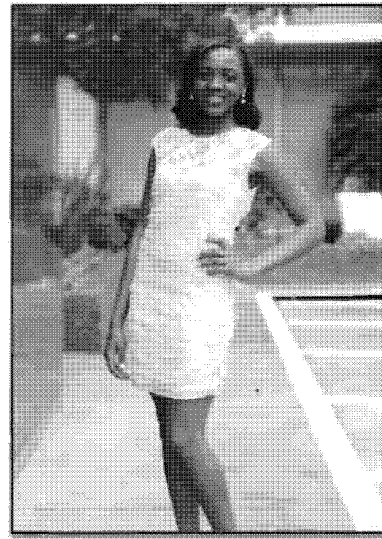
1209 T3 M2  
Jeannette Veras 17 5'6



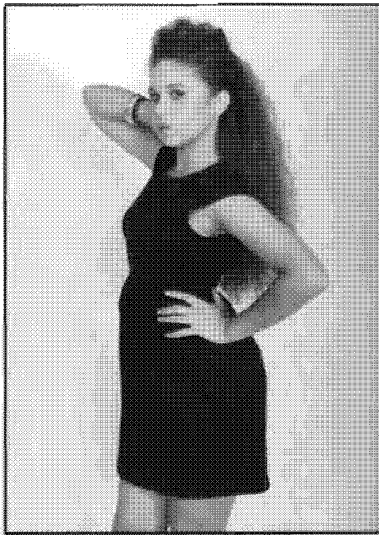
1210 T3 M2  
Shaylee Hendrickson 16 5'7



1302 T4 M3  
Madison Moreland 13 5'7



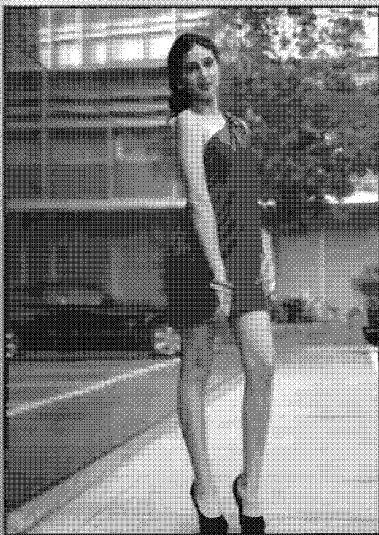
1303 T4 M3  
Breanna Robinson 14 5'7



1301 T4 M3  
Kaylah Humphrey 14 5'6



1305 T4 M3  
Dakota Burns 13 5'6



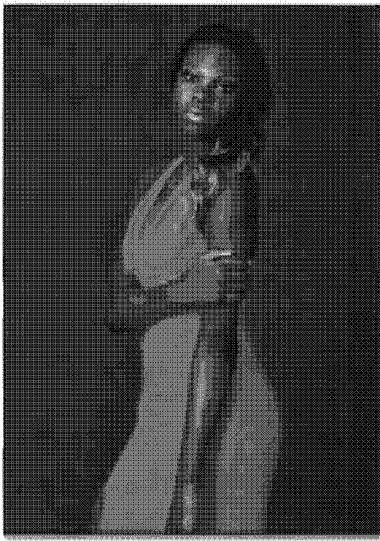
1307 T4 M3  
Brisette Vasquez 15 5'8



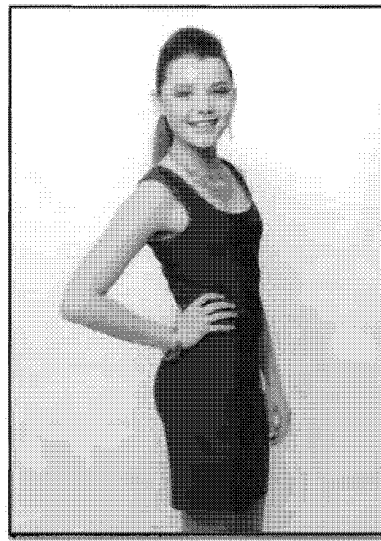
1308 T4 M3  
Denisse Sanchez 15 5'6



1309 T4 M3  
Plaintiff's Appendix 50



1310 T4 M3  
Fanta Traore 14 5'9



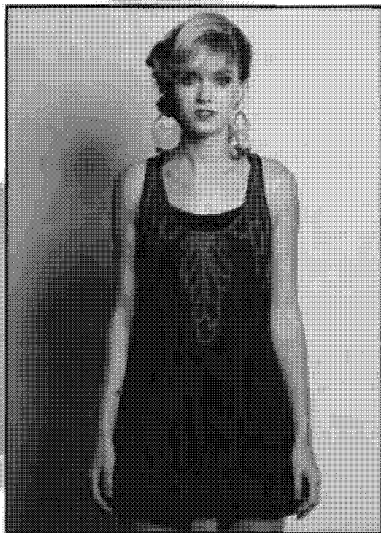
1311 T4 M3  
Cassie Tolleson 13 5'6



1312 T4 M3  
Tayler Hanley 15 5'6



1313 T4 M3  
C'Yana Boone 13 5'6



1314 T4 M3  
Zoie Ross 15 5'8

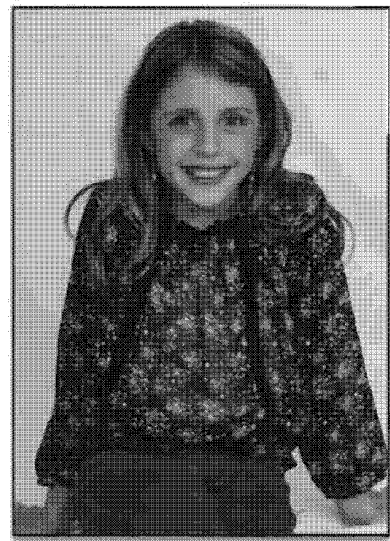


1316 T4 M3  
Alana Cuthbert 15 5'7

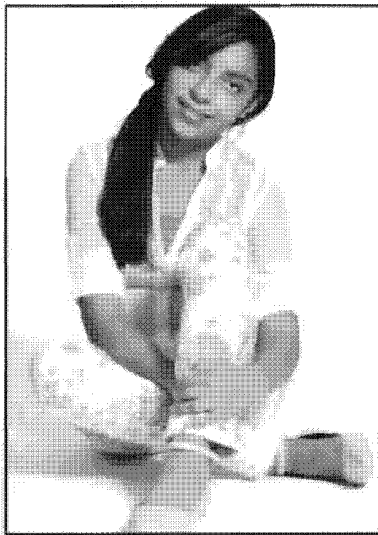




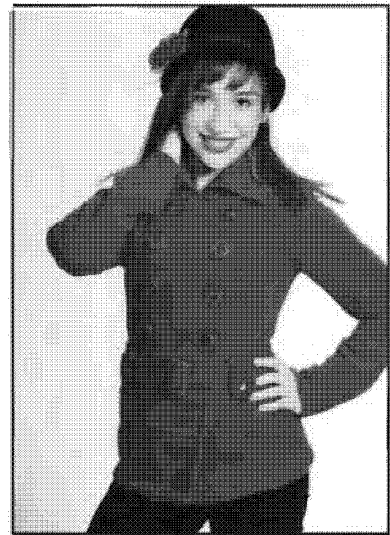
1401 T5 M4  
Betsabe Carillo 8 4'8



1402 T5 M4  
Mirabel Stansberry 10 4'4



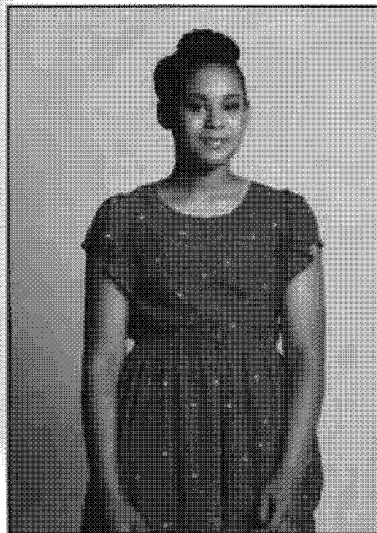
1403 T5 M4  
Marina Herrera 11 5'2



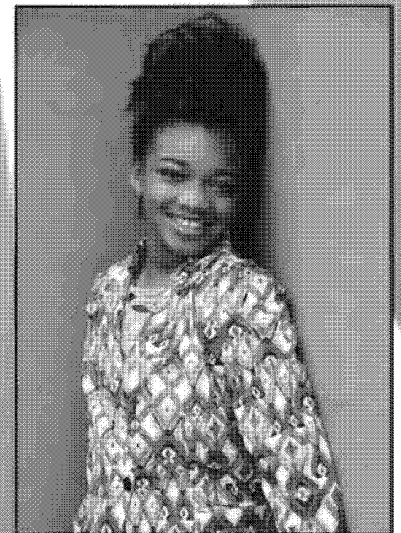
1404 T5 M4  
Hailey Rose Kasky 11 4'11



1407 T5 M4  
Yesheri Lopez 12 4'7



1408 T5 M4  
Aallyah Wylie 11 5'3



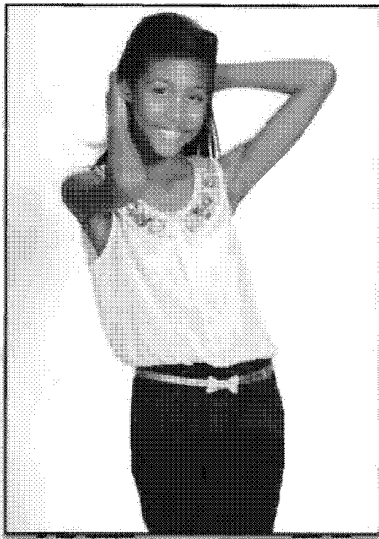
1409 T5 M4  
Aaliyah Wylie 11 5'5



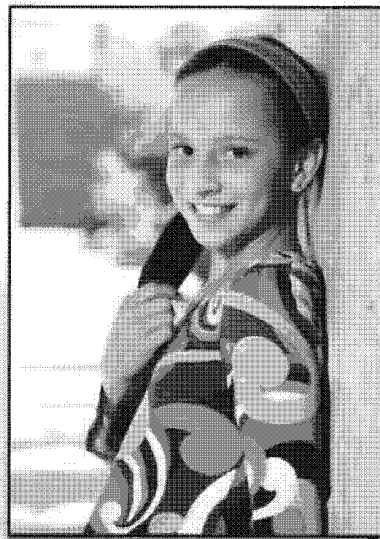
1410 T5 M4  
Jaszy Flores 12 4'7



1411 T5 M4  
Maiah Sol 8 4'0



1412 T5 M4  
Olivia Jones 11 5'1



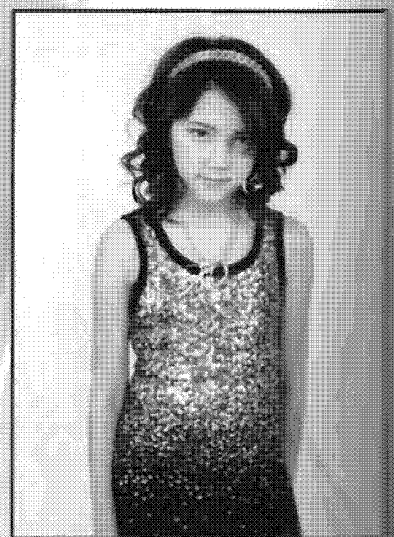
1413 T5 M4  
Stella Cronin 11 4'9



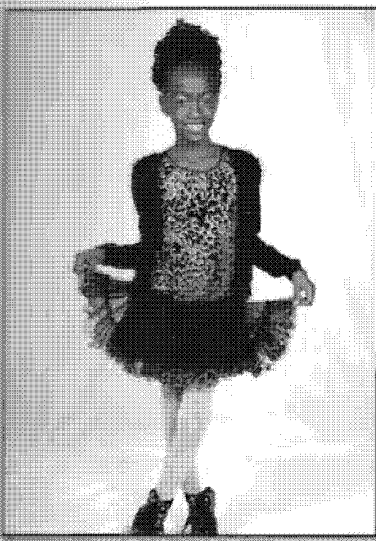
1415 T5 M4  
Kathleen Taroma 10



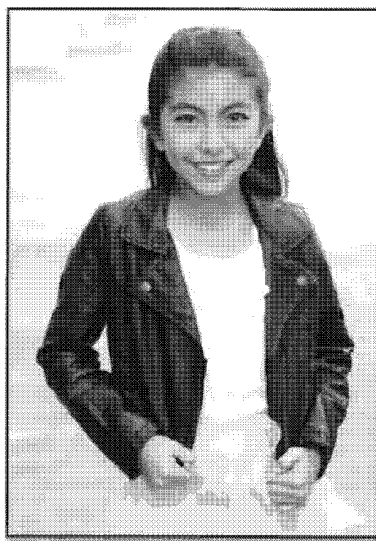
1416 T5 M4  
Nohea Smythe 8 4'6



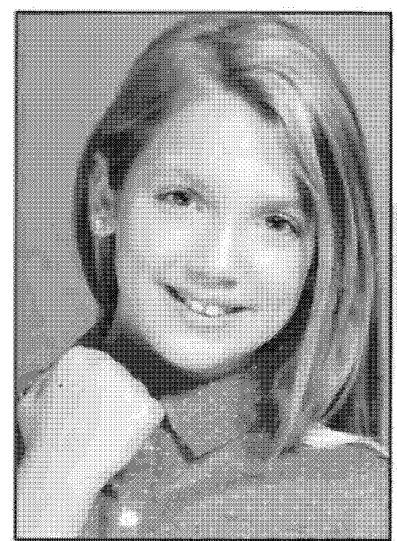
1417 T5 M4  
Kaarya Hammond 11 4'9



1421 T5 M4  
Aniyah Wright 9 4'5



1422 T5 M4  
Yzabella Sanchez 9 4'6



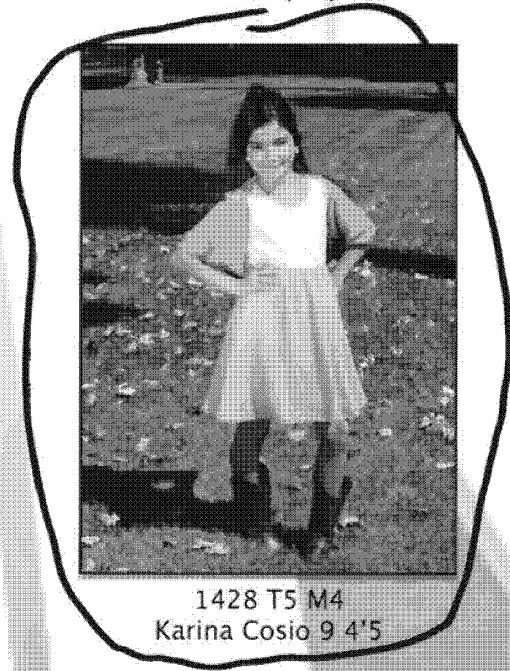
1423 T5 M4  
Sarah Asprey 9



1424 T5 M4  
Karissa Haines 12 5'3



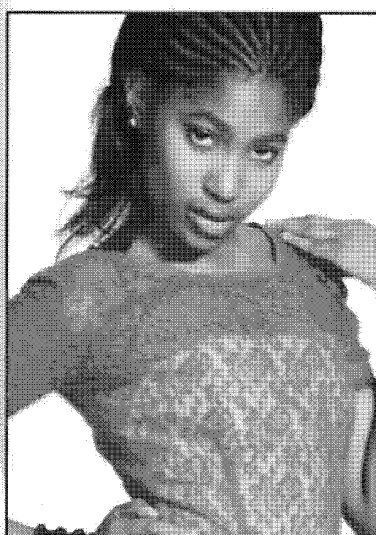
1427 T5 M4  
Alina Yakovenko 10 4'7



1428 T5 M4  
Karina Cosio 9 4'5



1429 T5 M4  
Sanaah Alston-Henry 7 4'1



1430 T5 M4  
Nya Bent 12 5'2

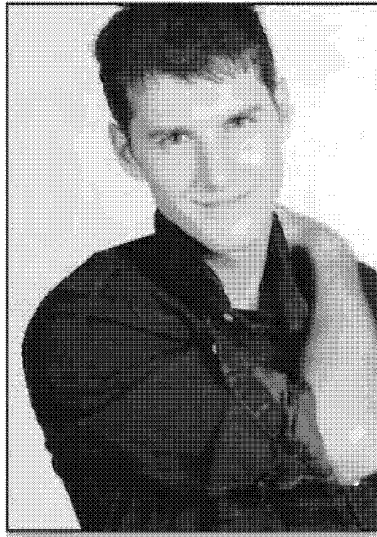


1431 T5 M4  
Amber Smith 10 4'8

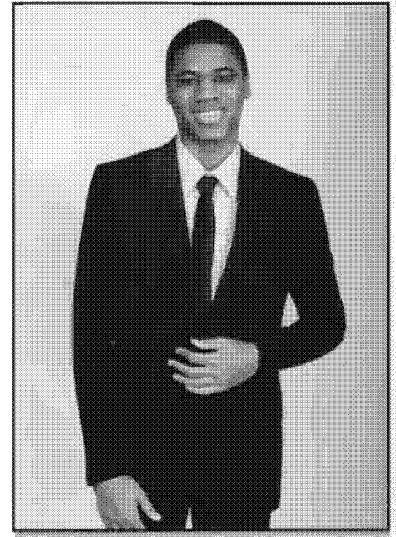




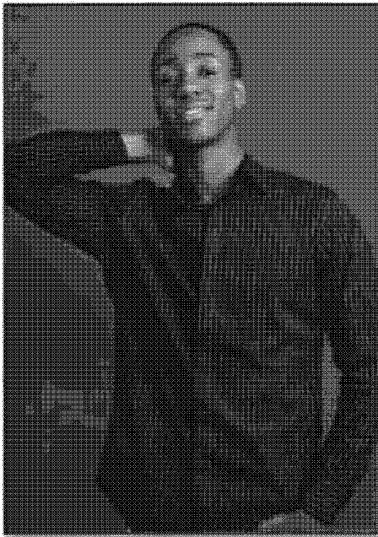
1432 T5 M4  
Leslie Torres 11 4'7



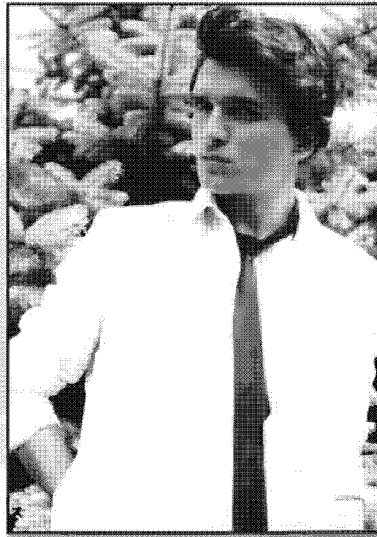
2101 T6 M5  
Steven Bahr 23 6'0



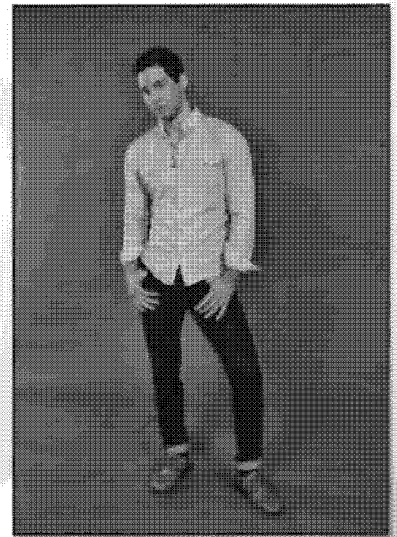
2102 T6 M5  
Tyree Carter 20 6'0



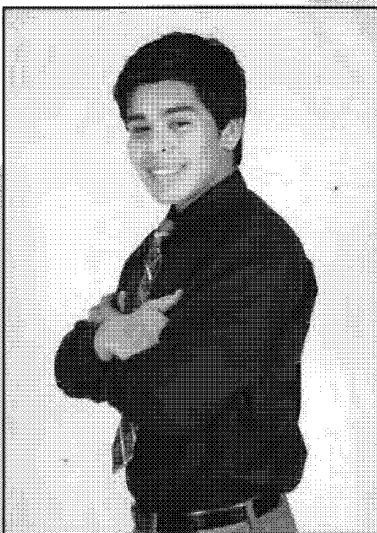
2103 T6 M5  
Christian Pettaway 18 6'1



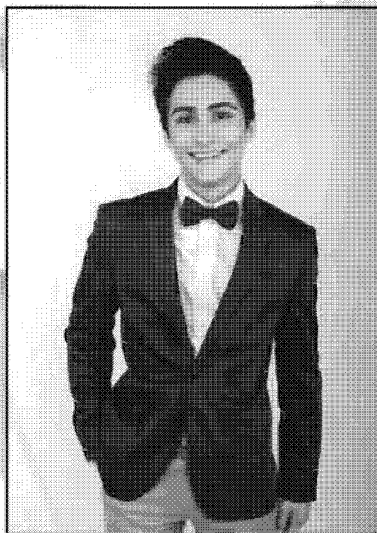
2104 T6 M5  
Marian Rydzanych 22 5'10



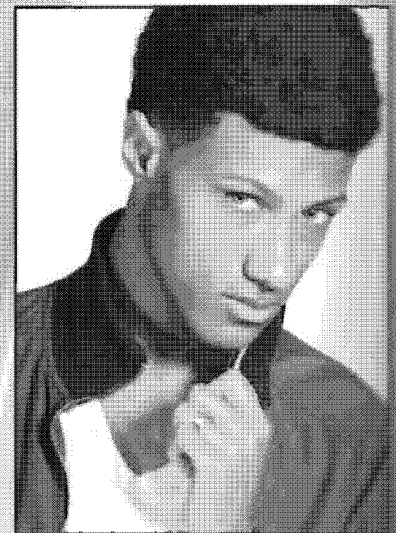
2105 T6 M5  
Dustin Farrington 19 6'2



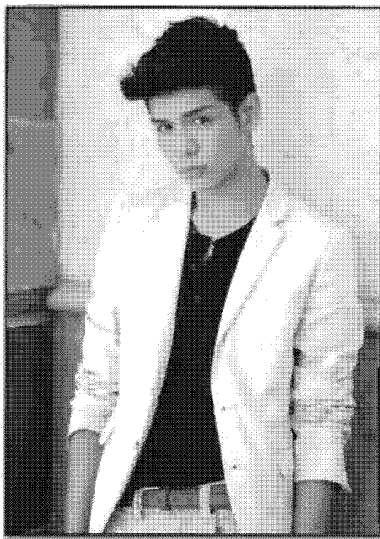
2201 T7 M6  
Ricardo Santana 16 5'9



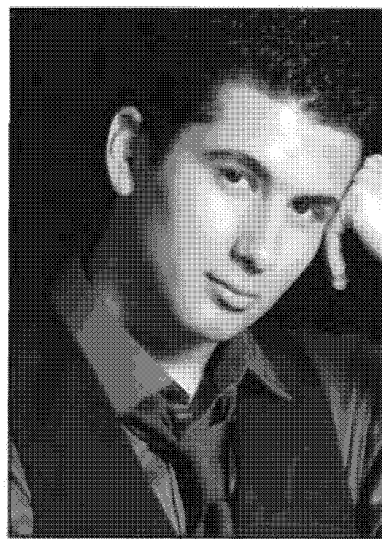
2203 T7 M6  
Christian El-Hage 17 5'8



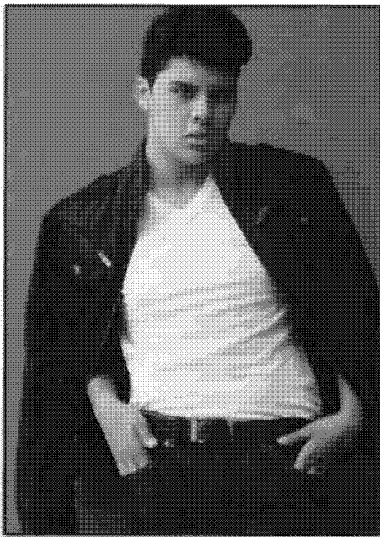
Plaintiff's Appendix 5  
2204 T7 M6  
Jamarr Gibson 16 5'7



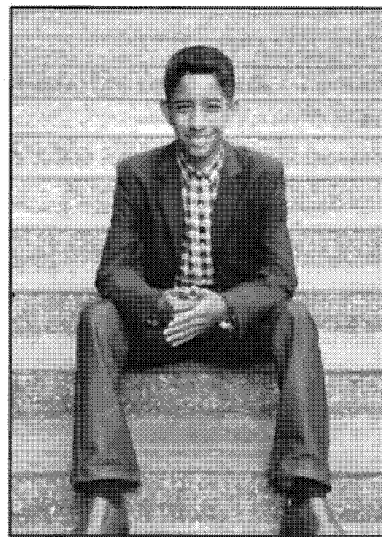
2205 T7 M6  
Gabriel Mohler 16 5'11



2206 T7 M6  
Anthony Bohorquez 17 5'10



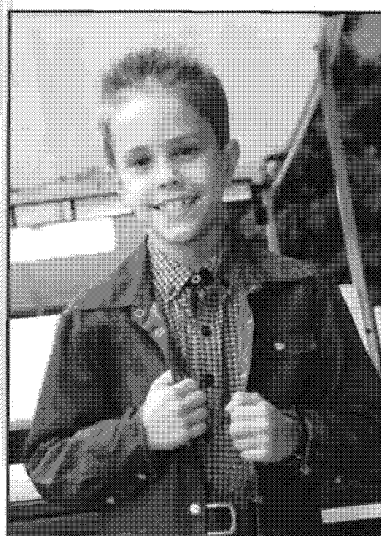
2207 T8 M6  
Jefferson Alberto 14 5'11



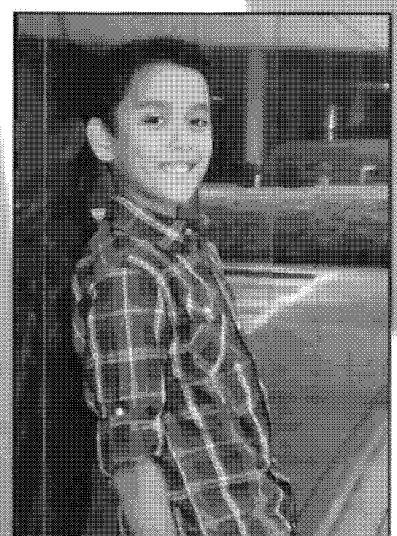
2208 T8 M6  
Neri Tello 14 5'6



2301 T9 M7  
Carlos Veras 9 4'0

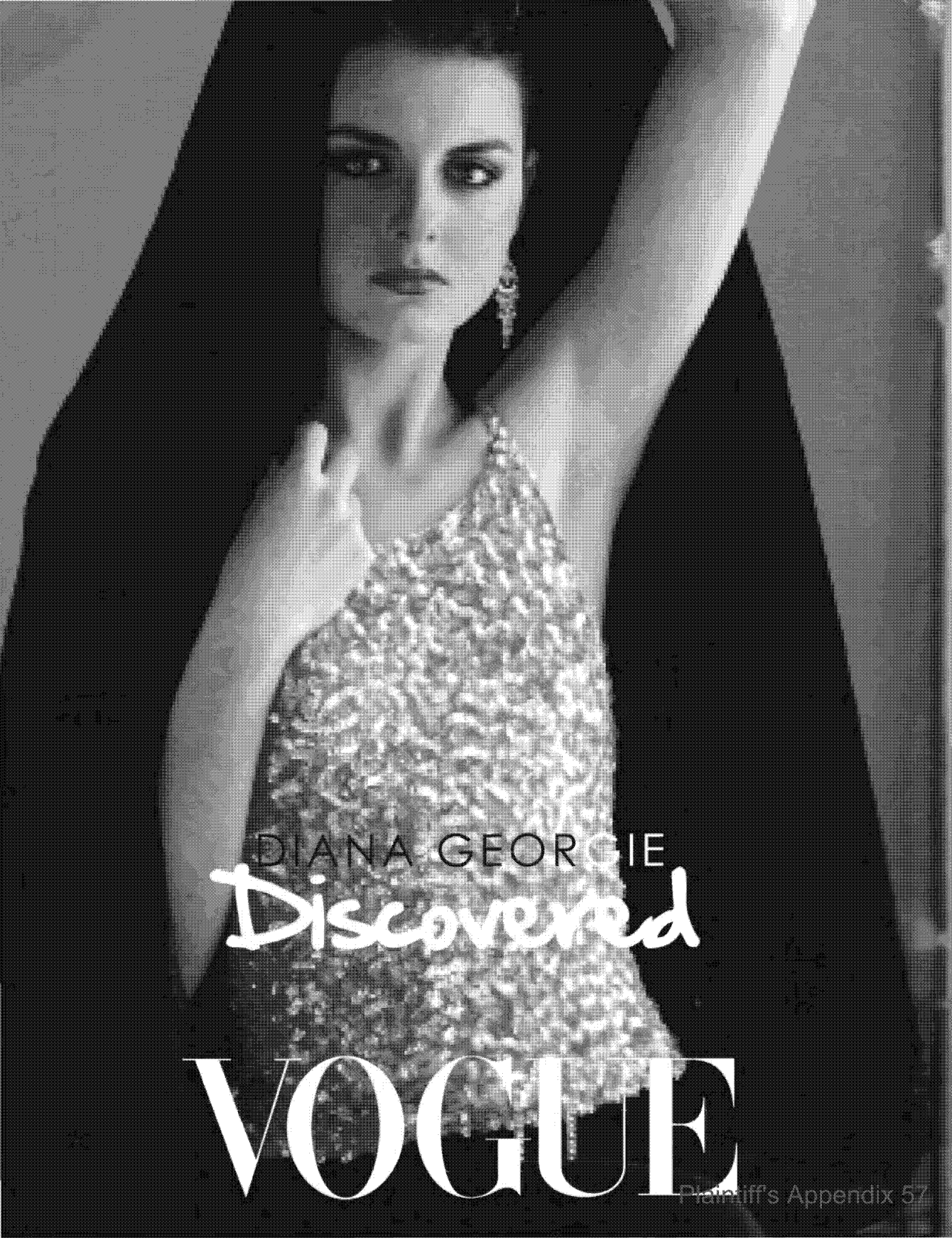


2303 T9 M7  
Weston Cheney 8 4'2



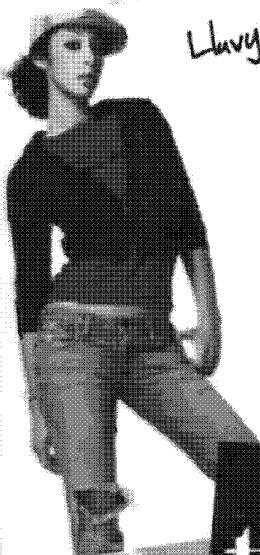
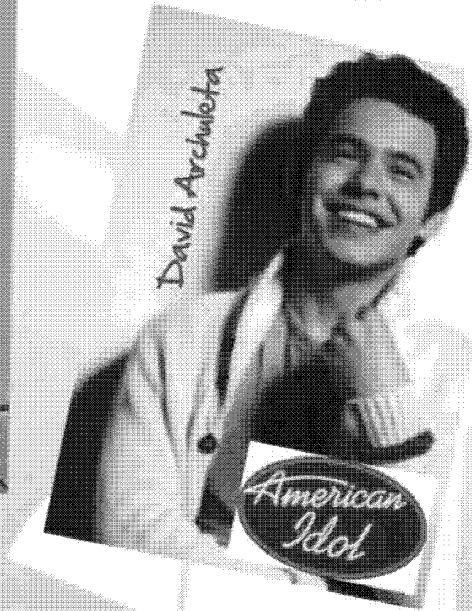
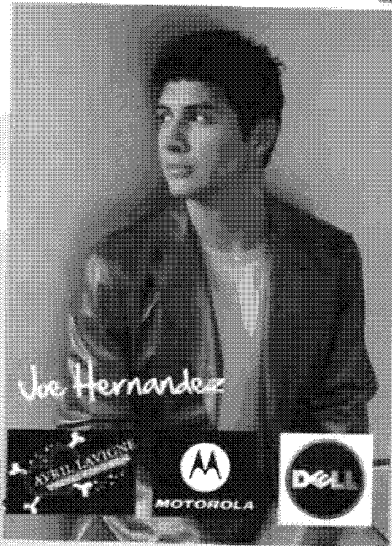
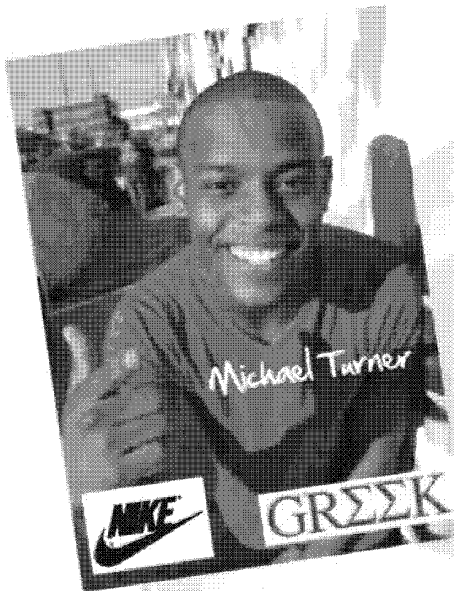
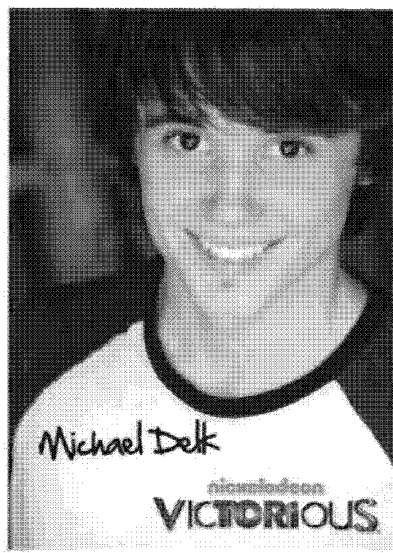
2304 T9 M7  
Plaintiff's Appendix 56





DIANA GEORGIE  
*Discovered*

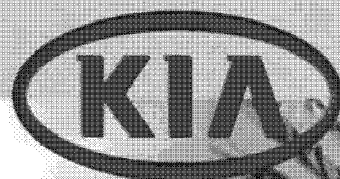
VOGUE

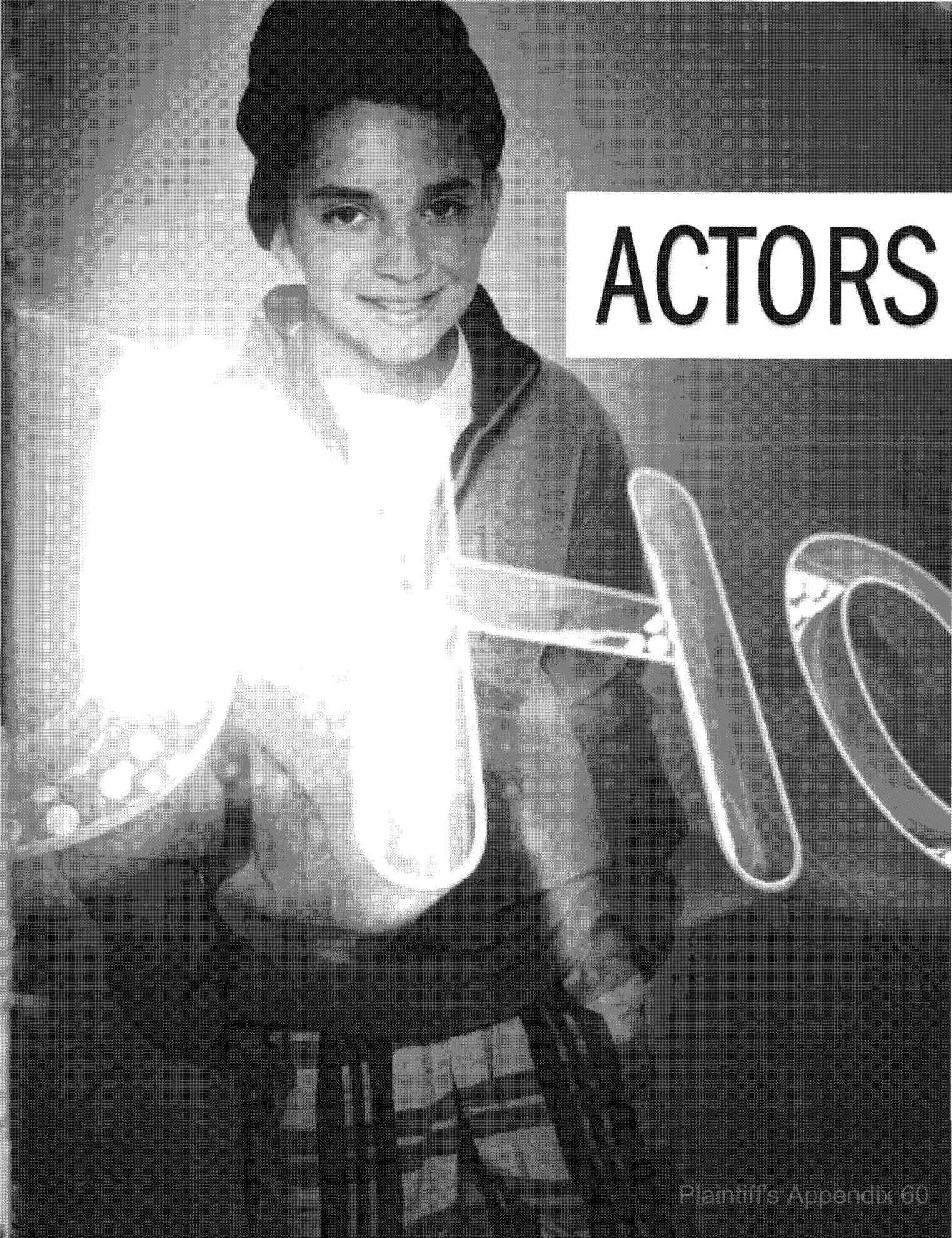


AMERICA'S NEXT  
top model



MIGUEL BOYA  
*Discovered*





# ACTORS





3101 T2  
Ardala White 33 4'10



3102 T2  
Lamira Jenkins 21 5'9



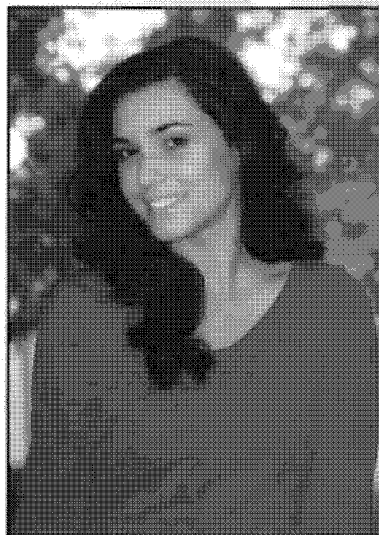
3103 T2  
Lindsey Reed 20 5'7



3105 T2  
Tayler Drew 18 5'3



3107 T2  
Bree Welch 18 5'1



3108 T2  
Laura D'Ambrosio 23 5'3



Plaintiff's Appendix  
Esther Kang 18 5'5



3110 T2  
Odalis Zepeda 18



3111 T2  
Dannielle Meheux 19 5'4



3113 T2  
Josselyn Sanchez 18 5'7



3114 T2  
Liz Tapia 19 5'7



3115 T2  
Katherine Vallejo 18 5'1



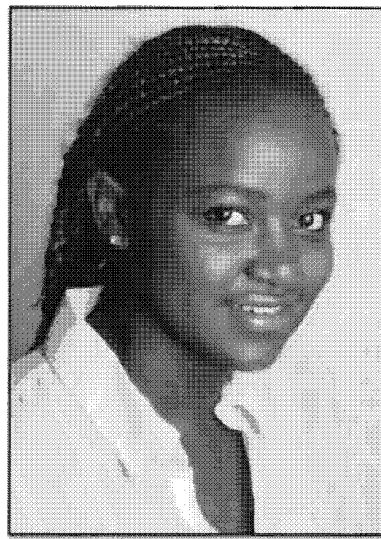
3116 T2  
Natalia Rendon 19 5'0



3119 T2  
Lily McWhorter 18 5'5



3120 T2  
Eliany Minaya 19 5'3



3121 T2  
Mercy Njenga 19 5'4



3122 T2  
Taylor Robinson 18 5'5



3123 T2  
Gabryelle Meheux 19 5'4



3127 T2  
Mahogany Punch 28 5'10



3128 T2  
BB Pena 21 5'4





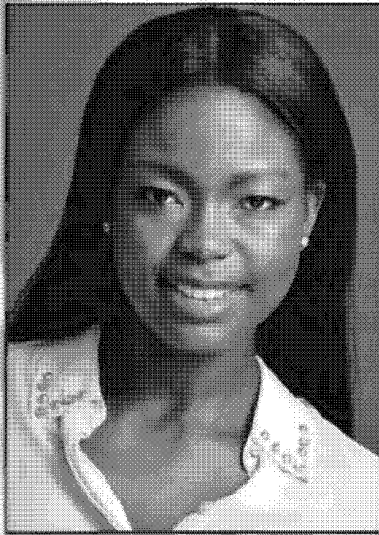
3129 T2  
Jessie Richard 18 5'6



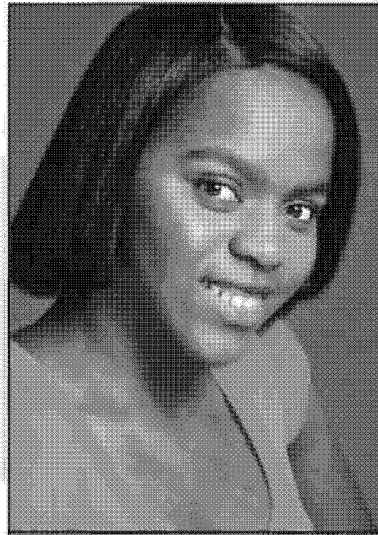
3130 T2  
Kellie Reed 21 5'5



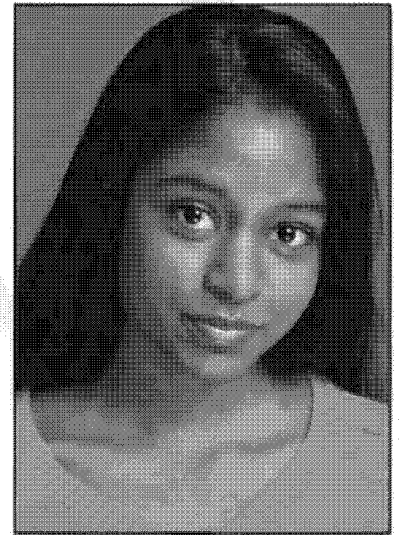
3131 T2  
Priya Drigpal 31 5'2



3132 T2  
Sasha Forrester 30 5'8



3133 T2  
Debora Luzincourt 18 5'9



3134 T2  
Amy Ramoutar 18 5'0

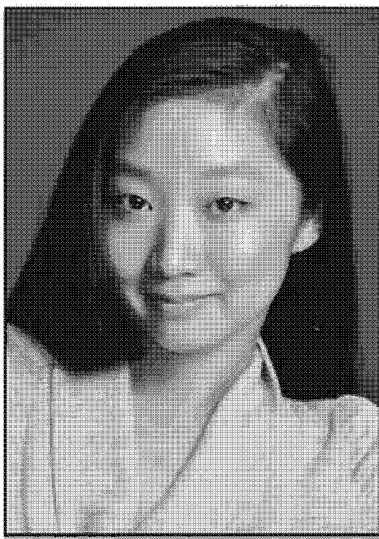


3135 T2  
Alexandra Hill-Fisk 18 5'4

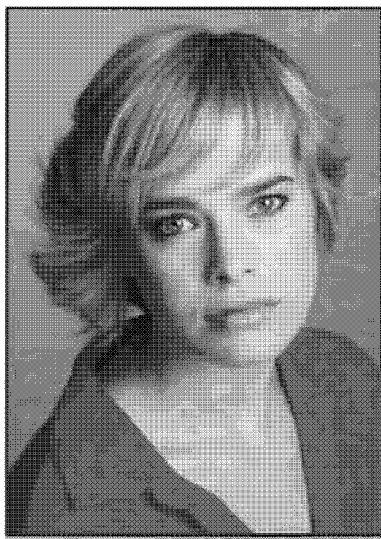


3137 T2  
Dominique Francis 18 5'8

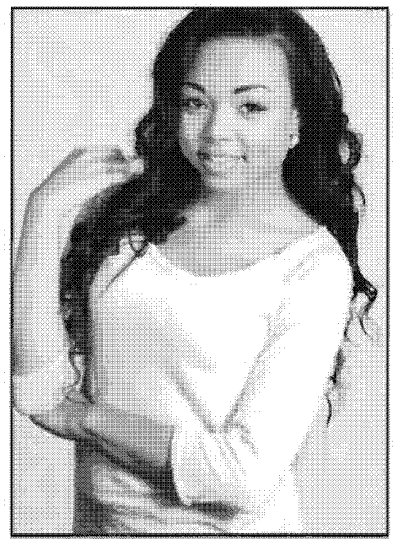




3138 T2  
Elizabeth Shin 22 5'7



3139 T2  
Grace Kohler 30 5'2



3140 T2  
Lakoya Felker 18 5'8



3141 T2  
Angie Cega 27 5'6



3201 T3  
Maritza Matos 17 5'5



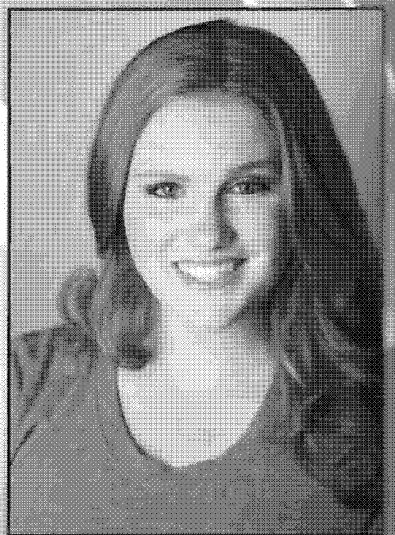
3202 T3  
Jaclyn Studniski 16 5'3



3203 T3  
Courtney McGill 17 5'6



3204 T3  
Jackee Braxton 16 5'5



3205 T3  
Lauren Hubbard 17 5'4



3206 T3  
Jennifer Arellano 16 5'0



3207 T3  
Cortney Romano 17 5'2



3208 T3  
Shelsee Hernandez 17 5'2



3209 T3  
Cecily Rowe 16 5'2



3210 T3  
Milena Kalina 17 5'1



3211 T3  
Jamilia Prescott 16 5'5

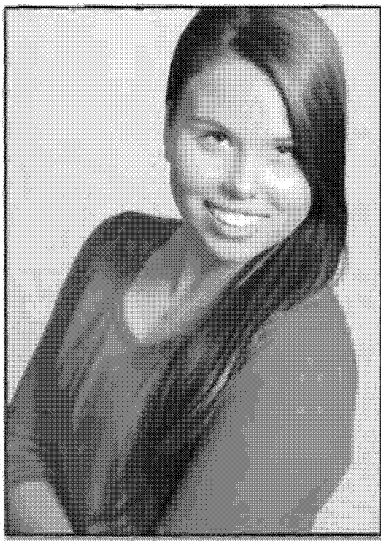


3212 T3  
Lupita Meijia 18 5'7

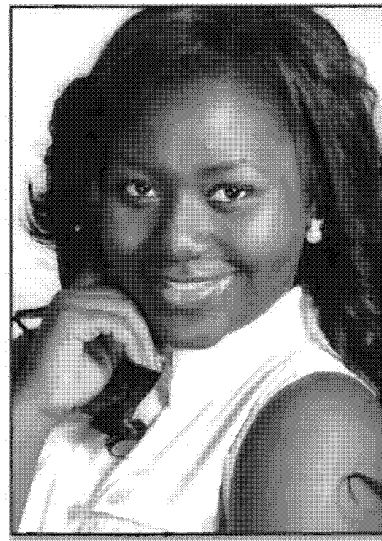


3213 T3  
Plaintiff's Appendix 66





3214 T3  
Amanda Jaeger 17 5'6



3216 T3  
Brenda Ndukong 16



3217 T3  
Francesca Rizzo 16 5'7



3218 T3  
Aurora Montes 16 5'3



3220 T3  
Carla Melendrez 16 5'6



3221 T3  
Mati Butler 17 5'7



3222 T3  
Aifeen Longmore 16 5'5



3223 T3  
Crystal Hernandez 17 5'7



3224 T3  
Kendy Betancourt 16 5'4



3225 T3  
Latisha Wilson 17 5'3



3226 T3  
Christina Jeffers 16 5'6



3227 T3  
Maria Martinez-Jacinto 16 5'5



3228 T3  
Joann Renee Pascasio 16 5'3



3229 T3  
Kimberly Schnetz 16 5'5



3230 T3  
Rachel Storey 17 5'1



3231 T3  
Plaintiff's Appendix 68

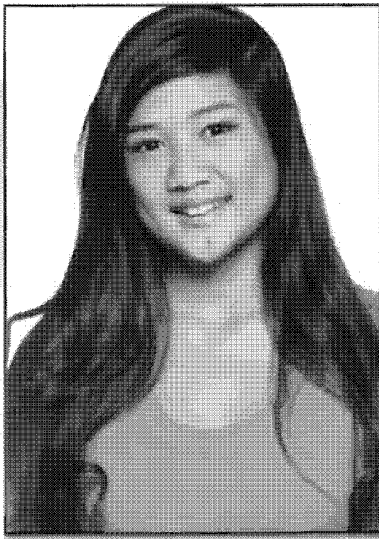




3233 T3  
Anna Simon 17 5'0



3234 T3  
D'Antiona Thompson 17 5'2



3235 T3  
Caislinn Millaize 16 5'7



3236 T3  
Bianca Hernandez 17 5'3



3238 T3  
Ashley Alvarado 17 5'1



3240 T3  
Kelly Julien 16 5'6



3241 T3  
Erika Soto 17 5'9



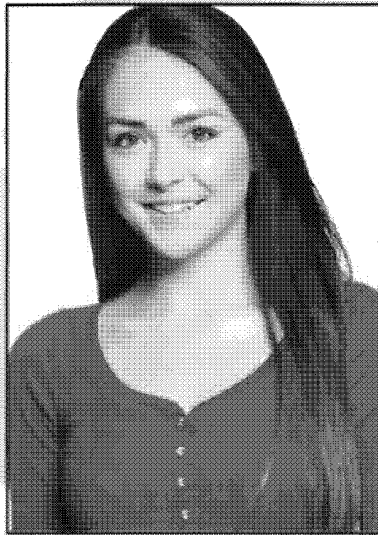
3243 T3  
Sonya Acuna 16 5'5



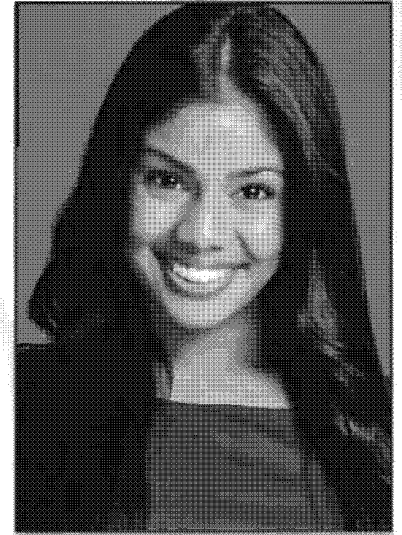
3244 T3  
Dymond Miller 17 5'6



3245 T3  
Shayna Blust 17 5'9



3246 T3  
Michaela Carroll 17 5'1



3247 T3  
Jennifer Rimrikhi 16 5'4



3301 T4  
Gisselle Ortiz 14 5'5



3302 T4  
Breanna Wilson 13 5'5



3303 T4  
Brenda Silva 14 5'1



3304 T4  
Alize Romero 13 5'6



3305 T4  
Zoe Key 14 5'5



3306 T4  
Katherine Tomlin 14 4'11



3307 T4  
Cindy Balderas 13 5'6

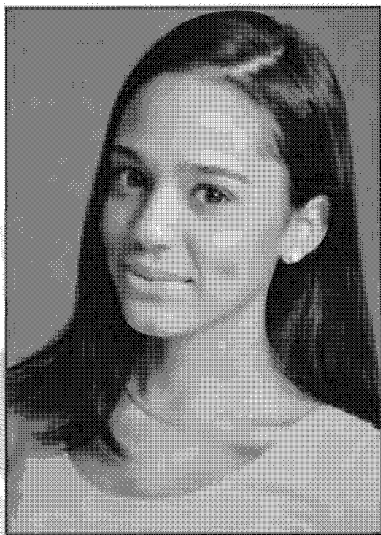


3308 T4  
Yadira Valdez 14 5'1

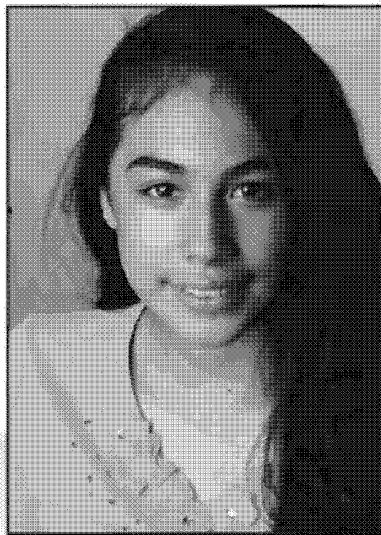


3309 T4  
Zoe Worthen





3312 T4  
Graciela Henriquez 15 5'4



3313 T4  
Johana Santillan-Meza 13 4'11



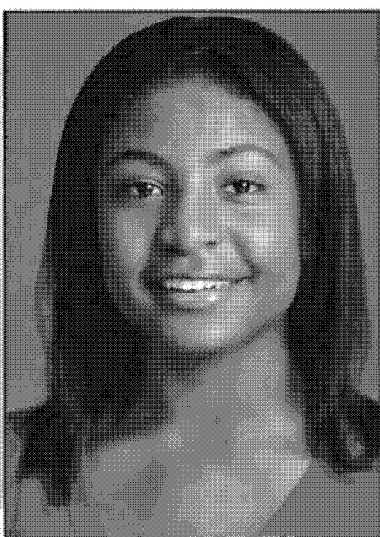
3316 T4  
Dominique Offord 14 5'3



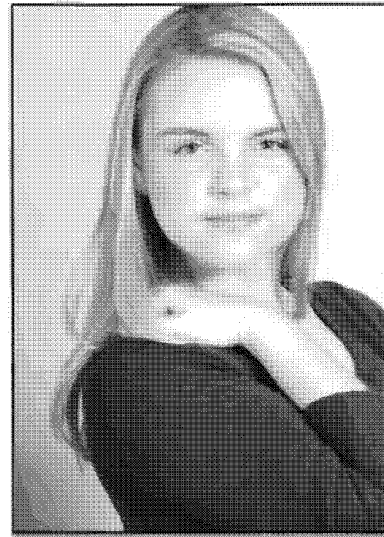
3317 T4  
Aubrey Cardona 13 5'5



3318 T4  
Renee Lewis 15 5'1



3319 T4  
Janelle Murray 14 5'5



3320 T4  
Plaintiff's Appendix 72



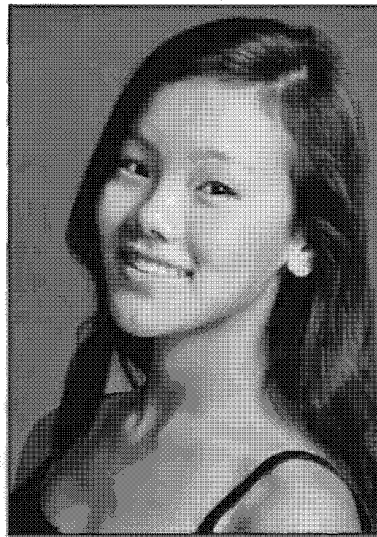
3321 T4  
Megan Gleason 14 5'4



3322 T4  
Gabrielle Zabot 13 5'0



3323 T4  
Haleigh Scott 14 5'4



3325 T4  
Phurwa Sherpa 14 5'3



3326 T4  
Jennifer Wilson 13 4'10



3327 T4  
Jessica Alonso 13 4'10



3329 T4  
Christiana Kolosvary 13 5'3



3330 T4  
Madison Perch 14 5'3





3331 T4  
Lauren Bosco 14 5'5



3334 T4  
Michaella Manuel-Sagon 13 4'11



3335 T4  
Rachel De La Cruz 15 5'1



3336 T4  
Taylor Iwanaka 14 5'1



3337 T4  
Julia Delgadillo 14 5'0



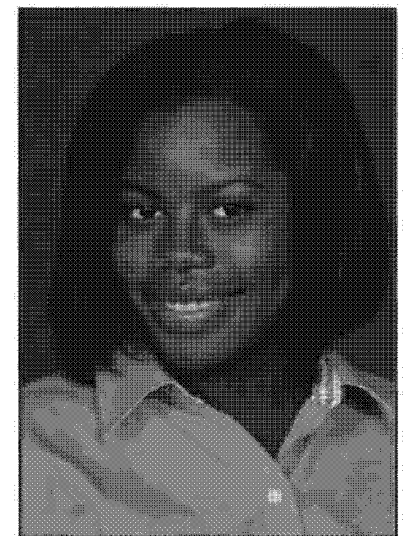
3338 T4  
Natalie Rubinstein 15 5'3



3339 T4  
Marisol Dominguez 15 5'3



3340 T4  
Melineth Rivera 15 5'1



3341 T4  
Plaintiff's Appendix 74



3342 T4  
Andrea Nastav 14



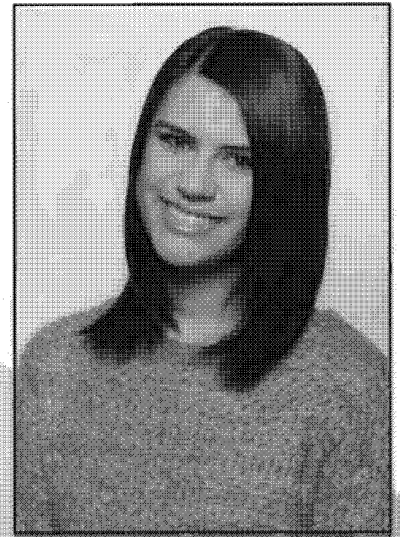
3343 T4  
Amy Phillips 13 5'0



3344 T4  
Lariah Wilks 15 5'1



3345 T4  
Jaannika McClinton 14 5'5



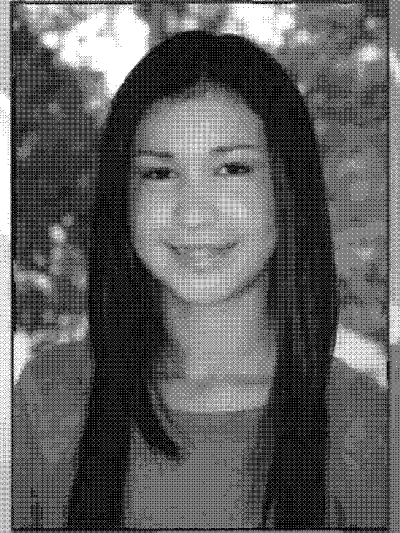
3347 T4  
Angela Palant 15 5'5



3348 T4  
Sasha Williams 13 5'4



3349 T4  
Fabiola Gomez 13 5'6



3350 T4  
Mary Salazar 13 4'11





3351 T4  
Kimberly Serrano 13 5'1



3352 T4  
Hewan Talaktor 14 5'0



3353 T4  
Julissa Serrano 15 5'1



3354 T4  
Lisbeth Saldana 15 5'4



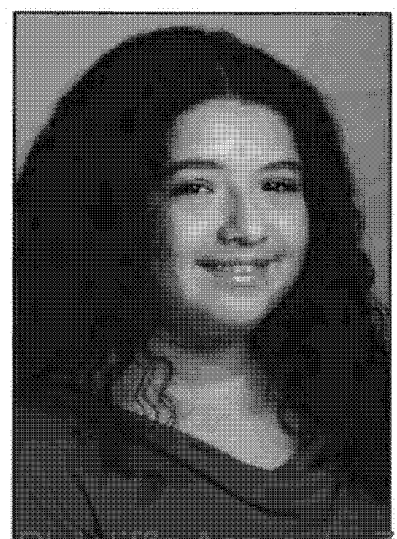
3355 T4  
Lizbeth Enriquez 15 5'4



3357 T4  
Payneet Sidhu 13 5'5

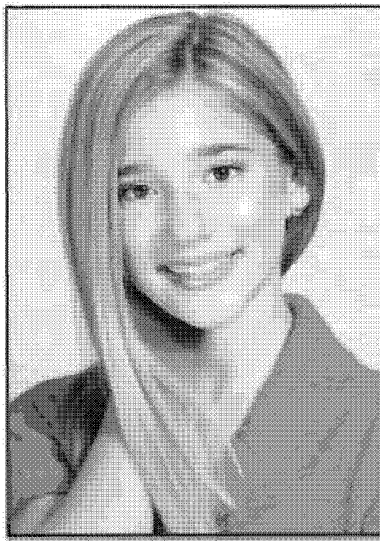


3358 T4  
Nayia Smith 13 4'11



Plaintiff's Appendix 76  
3401 19  
Yuvia Martinez 12 5'2

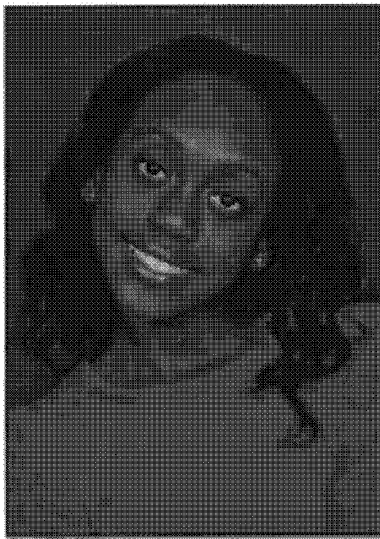




3402 T5  
Julie-Ann Kasky 11 4'7



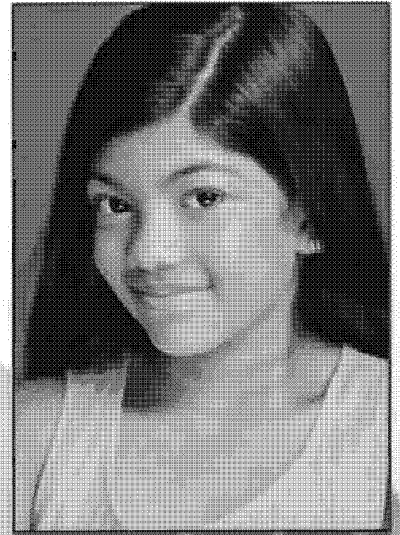
3403 T5  
Veronica Saint Fort 11 4'11



3405 T5  
Danielle Roberts 11 5'2



3406 T5  
Shorena Tsurtsunia 11 5'2



3407 T5  
Leuna Muhit 9 4'0



3409 T5  
Danica Silvestre 9 4'7



3410 T5  
Hannah Savella 8 4'0



3411 T5  
Patricia Justiniano 11 5'0



3413 T5  
Cindy Mustelie 11 4'4



3415 T5  
Michelle Arevalo 8 4'5



3416 T5  
Yaritza Algarate 10 5'2



3417 T5  
Precious Ogyiri 10 4'1



3418 T5  
Makayla Johnson 11 5'1



3419 T5  
Courtney Fansler 6



3420 T5  
Morgan Nator 11 5'1



3421 T5  
Alyssa Yates 9 4'0



3422 T5  
Liza Vega 5 10 4'9  
Plaintiff's Appendix 78

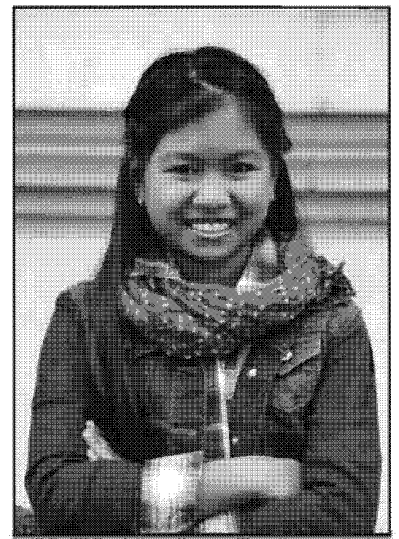




3424 T5  
Danielle Wu 10 4'3



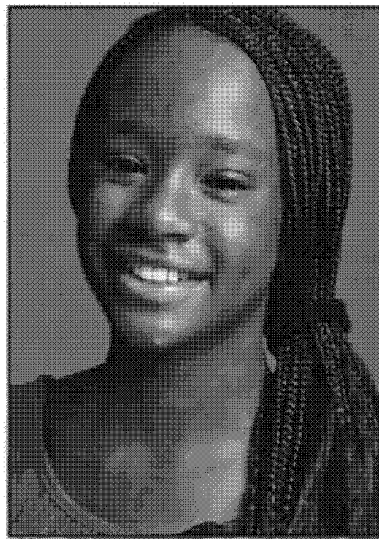
3425 T5  
Pamela Gonzalez 12 5'2



3426 T5  
Kate Paduganao 10 4'8



3427 T5  
Rebecca Sahagun 6 4'4



3428 T5  
Hennah Ramadhani 12 5'5



3429 T5  
Mary Neely 12 5'2



3430 T5  
Alysha Vela 9 4'5



3431 T5  
Kailyn Perez 7 4'4



Plaintiff's Appendix 79  
Victoria Gardea 12 5'0



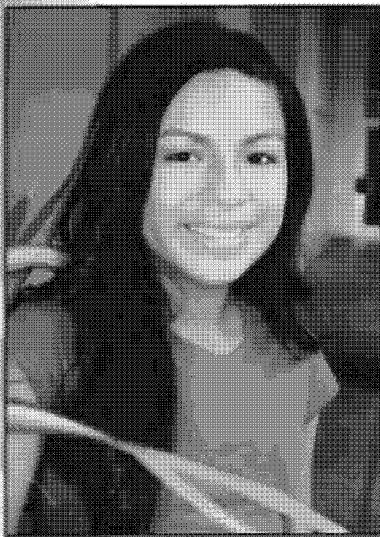
3434 T5  
Vanessa Zepeda 12 4'2



3435 T5  
Valerie Trujillo 11 4'8



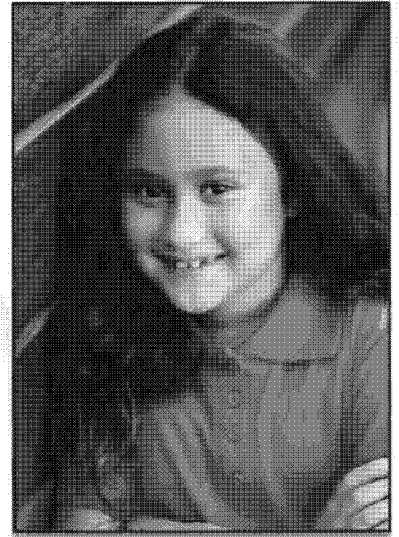
3436 T5  
Sarah Yee 10 4'9



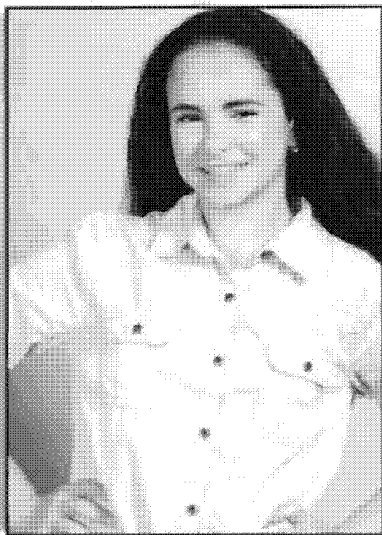
3437 T5  
Janie Bernal 11 5'0



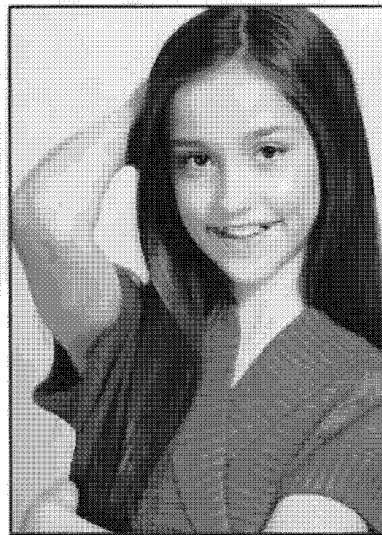
3439 T5  
Norma Meza 9 4'7



3440 T5  
Harmmeet Pandey 7 4'1



3442 T5  
Emily Fridland 12 5'1



3443 T5  
Kelsie Paige Kask 11 4'9

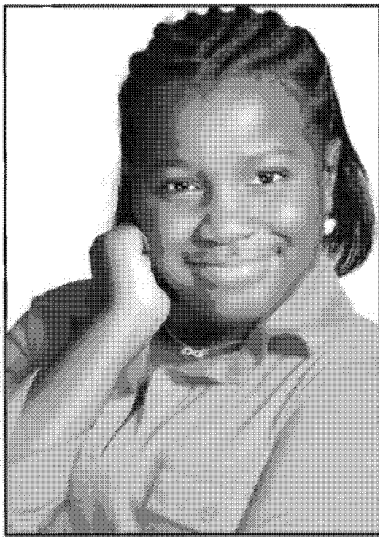




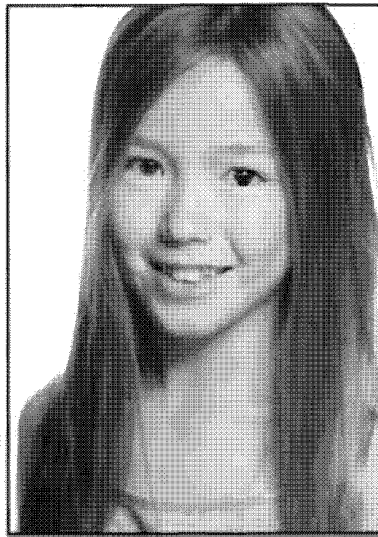
3444 T5  
Arianne Barton 10 4'5



3445 T5  
Keichiana Arellano 11 4'11



3446 T5  
Laila Morris 10 4'7



3447 T5  
Miisha Masterson 9



3448 T5  
Alazay Guadarrama 9 4'4



3450 T5  
Melanie Fernandez 10 4'5



3451 T5  
Josie Clark 12 5'2

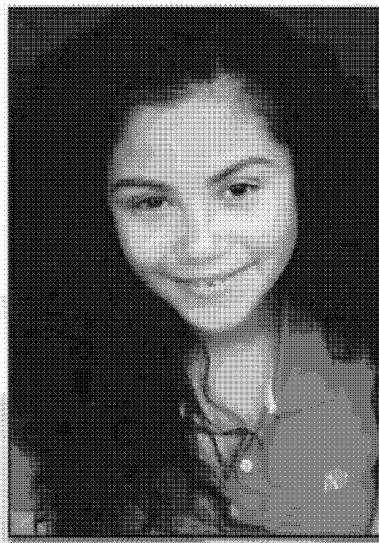


3452 T5  
Itzel Hernandez 10 4'6





3453 T5  
Brianna Renae 11 4'8



3454 T5  
Analia Blas 12 4'11



3455 T5  
Shalini Jackson 9



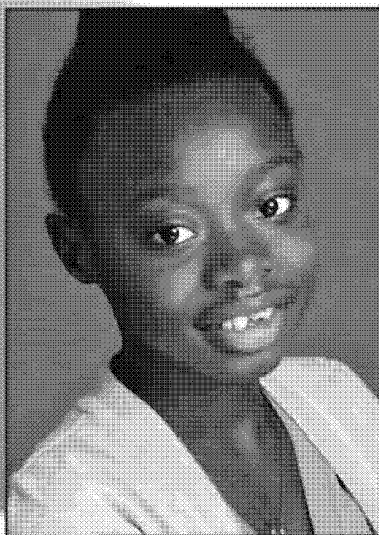
3456 T5  
Sulecia Luna 12 5'1



3457 T5  
Vanita Jackson 10



3458 T5  
Jennifer Williams 9 4'2



3459 T5  
Ruth Pedro 10 4'11



3460 T5  
Caylee Gil 12 5'2



3461 T5  
Isabella Tolerson 11 4'9



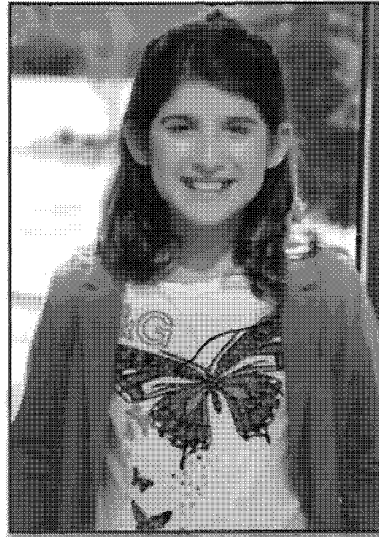
3462 T5  
Jimena Sandoval 11 5'1



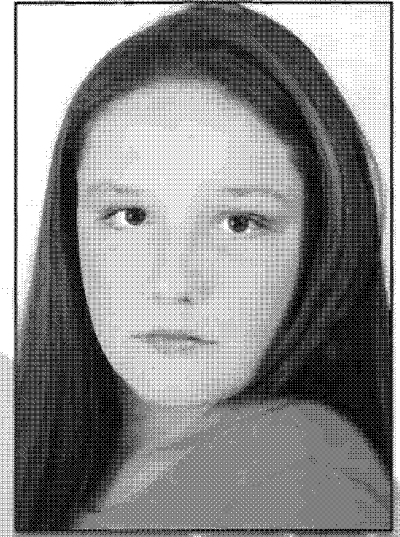
3463 T5  
Kayla Arriola 11 4'11



3466 T5  
Emily Boom 12 5'0



3467 T5  
Grace Embleton 11 4'10



3468 T5  
Lorelei Deely 11 5'3



3469 T5  
Shanna Baisa 12 5'1



3470 T5  
Sydney Walker 12 5'3



3471 T5  
Sasha Kahunani 11





3472 T5  
Haley Lannon 11 5'0



3474 T5  
Lexus Vang 9 4'0



3476 T5  
Melanie Brondo 9 4'4



3477 T5  
Kimberly Hernandez 9 4'2



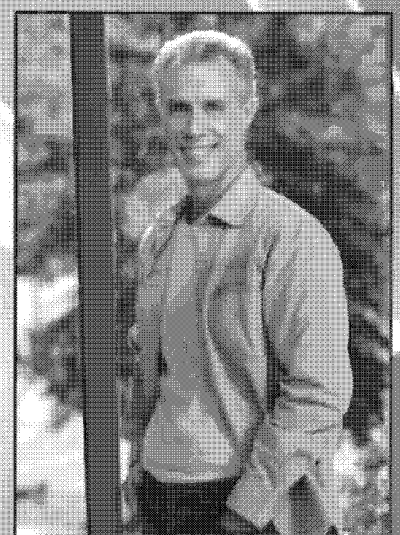
3478 T5  
Brianna Jimenez 12 4'9



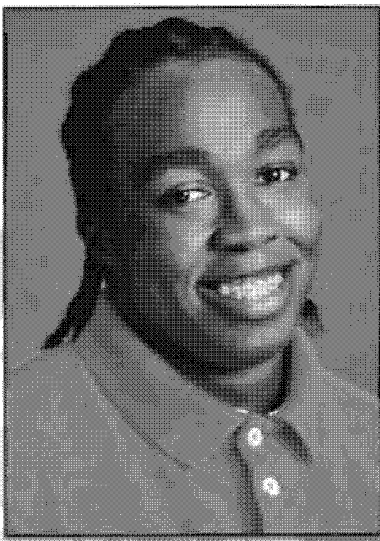
3479 T5  
Arielle Herrero 9 4'7



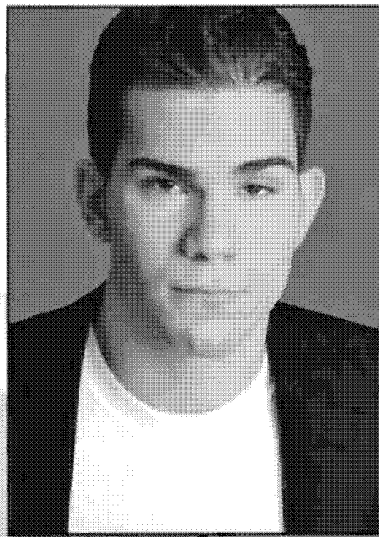
3480 T5  
Danielle McGregor 10 4'7



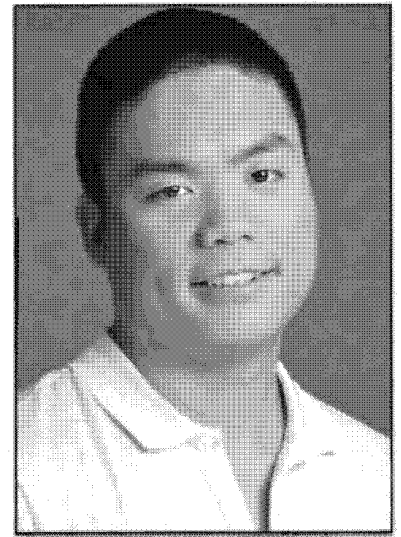
4101 T6  
Richard Fleming 9 3'9



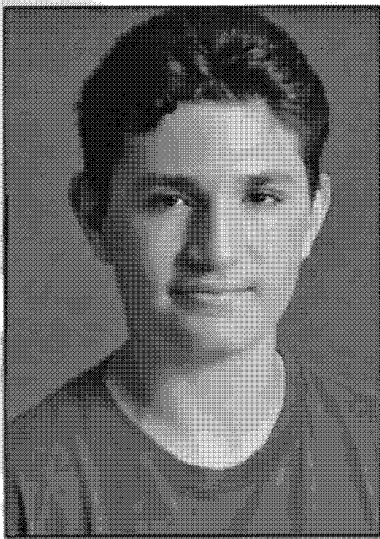
4102 T6  
Andre Goines 20 5'9



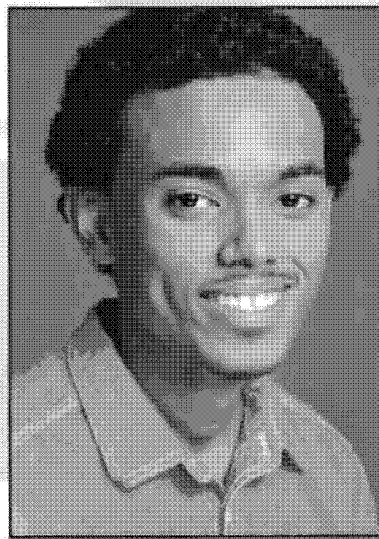
4103 T6  
Octavio Lopez 21 6'2



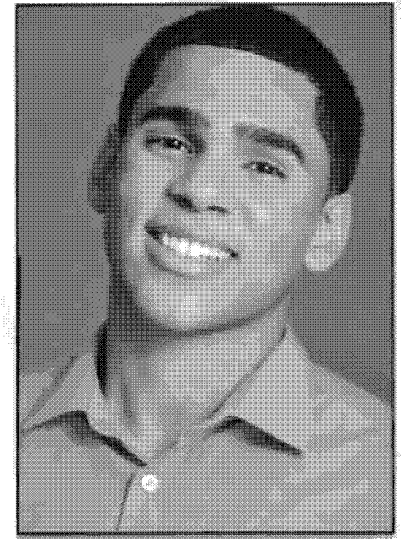
4104 T6  
Kelvin Li 21 6'0



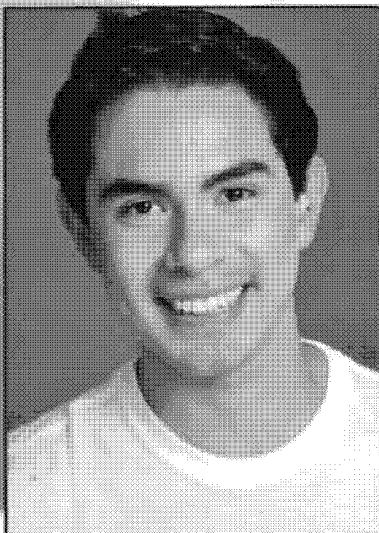
4105 T6  
Cristian Torres 18 5'11



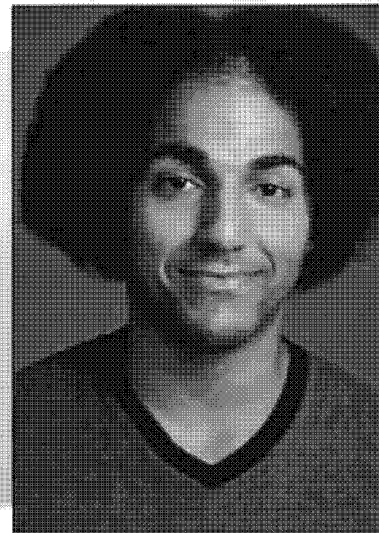
4106 T6  
Benjamin Khare 18 5'8



4107 T6  
Christopher Gutierrez 18 5'6



4108 T6  
Joshua Delgado 21 5'5

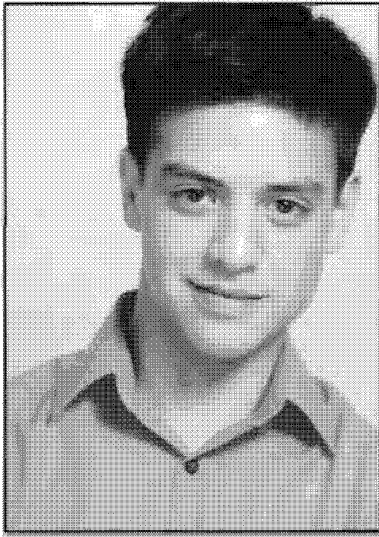


4109 T6  
Pedro Rodriguez 21 5'8

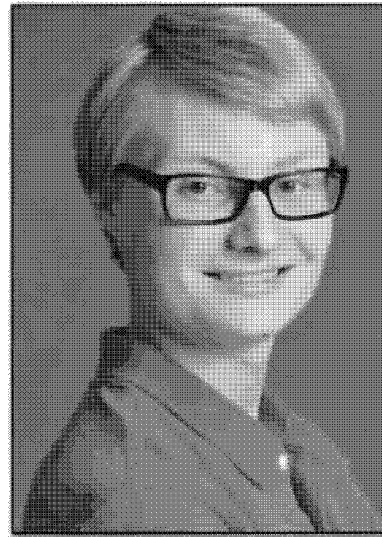


4110 T6  
Erin Reyes 24 5'5





4201 T7  
Tonatiu Ruiz-Escobedo 16 5'3



4202 T7  
Winston Courboin 17 5'9



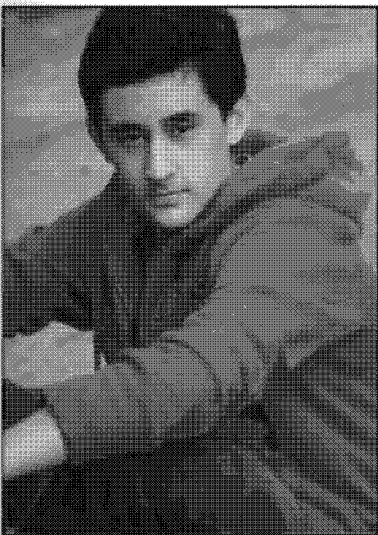
4301 T8  
Jesus Ramos 14 5'11



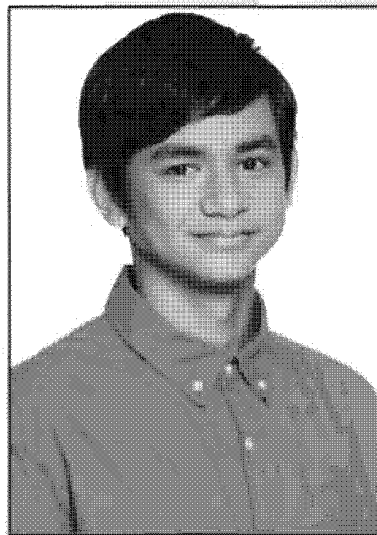
4302 T8  
Ivan Flores 13 5'2



4304 T8  
Mauro Ayala 13 5'4



4305 T8  
Seth Moure 13 5'6

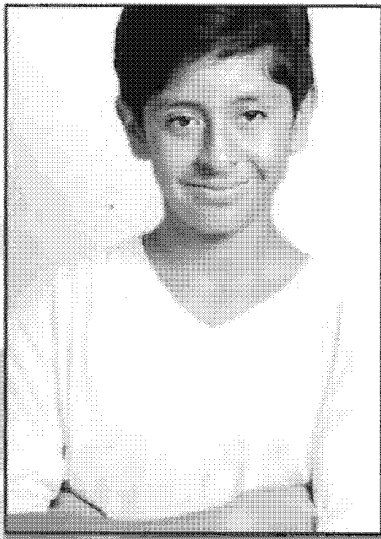


4306 T8  
Aena Bennett 15 5'11

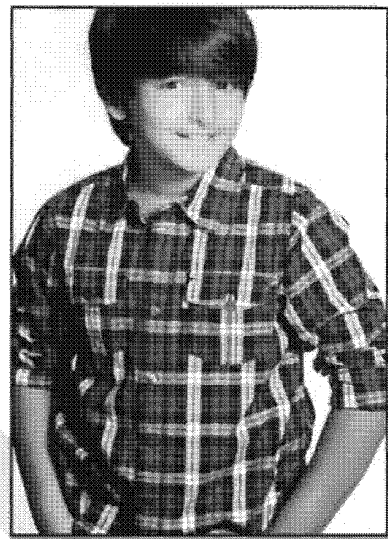


4401 T9  
Aden Boodanian 9 4'9

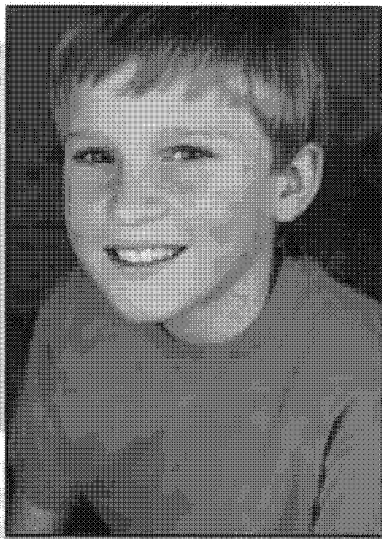




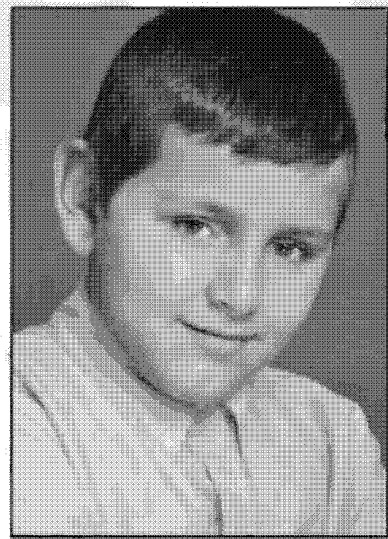
4404 T9  
Uzziel Zarate 11 5'2



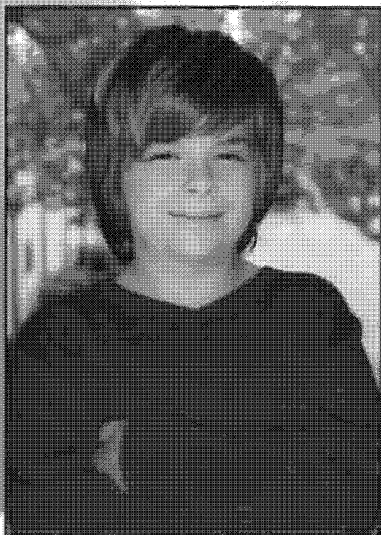
4405 T9  
Zarak Khan 10 4'5



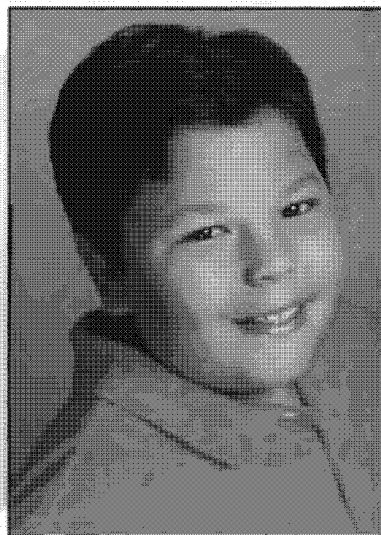
4406 T9  
Jasen Scrivin 11 4'8



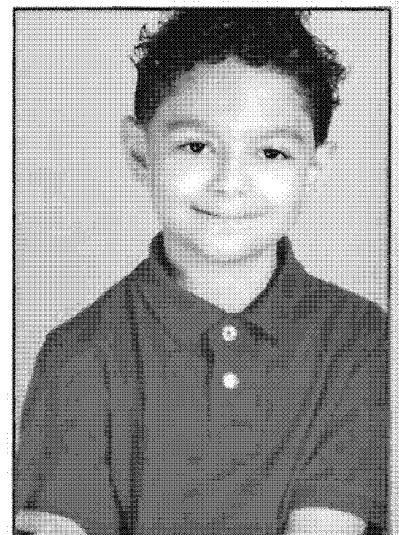
4407 T9  
Driton Berisha 9 4'8



4408 T9  
Ethan Sawyer 8 4'8



4409 T9  
Elias Williams 10 4'7

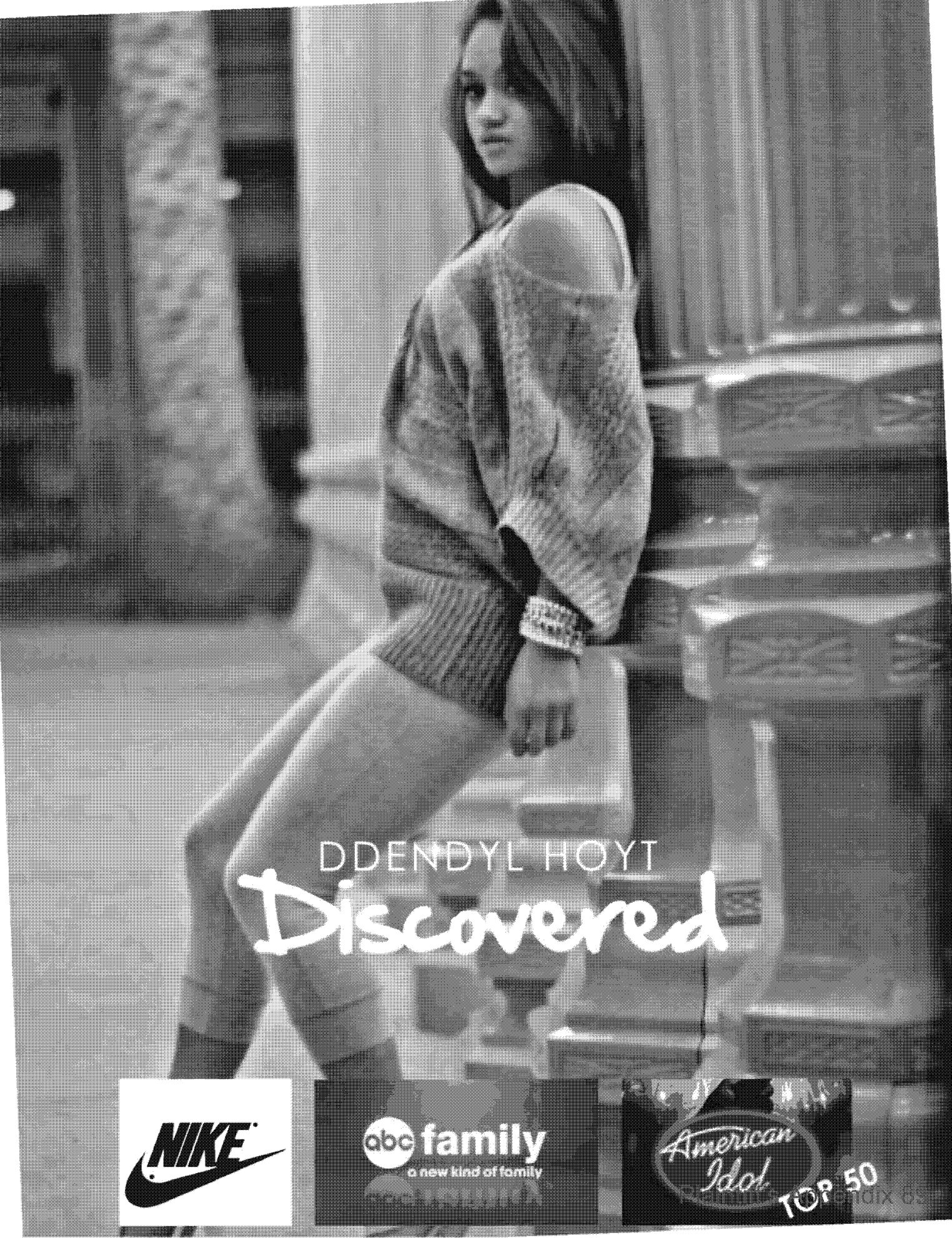


Plaintiff's Appendix 87  
Saleh Yahya 8 3'5

JULIAN ALCARAZ  
*Discovered*





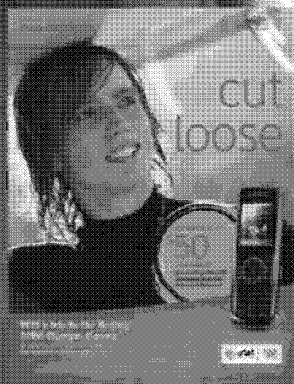


DENDYL HOYT

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CHARLES POST  
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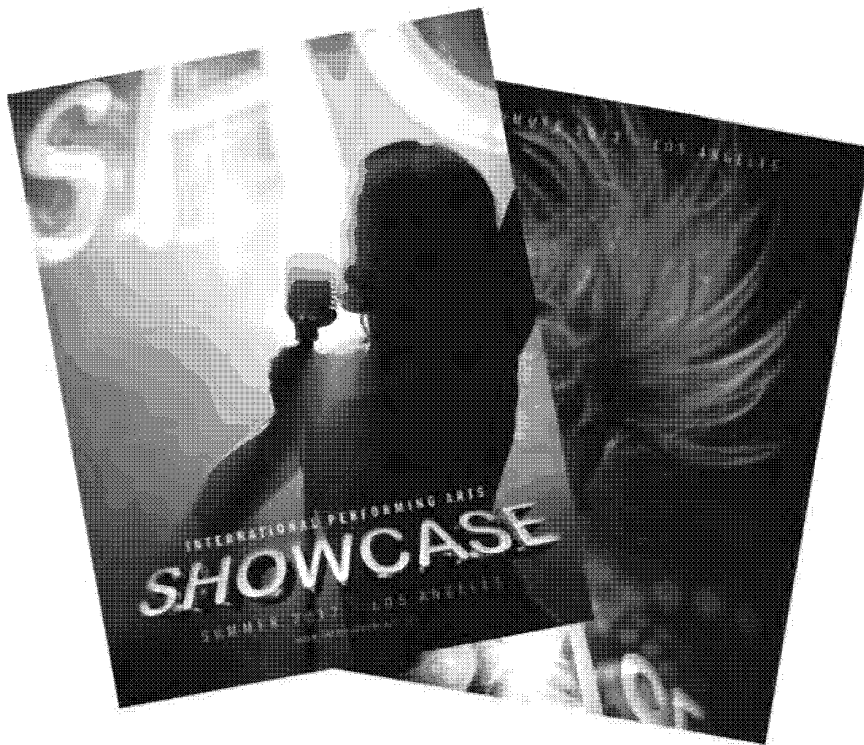
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# SHOWCASE SUMMER 2014 PRE-REGISTRATION

Showcase participants will receive an alumni scholarship to attend in the Winter of 2014!

For more information and a pre-registration packet, please see our Showcase Directors at the pre-registration desk or ask any Showcase Staff Member.



## VISIT US ONLINE FOR:

Success stories and pictures from Winter 2014, and for more info on tryouts for the Summer 2014 Showcase.

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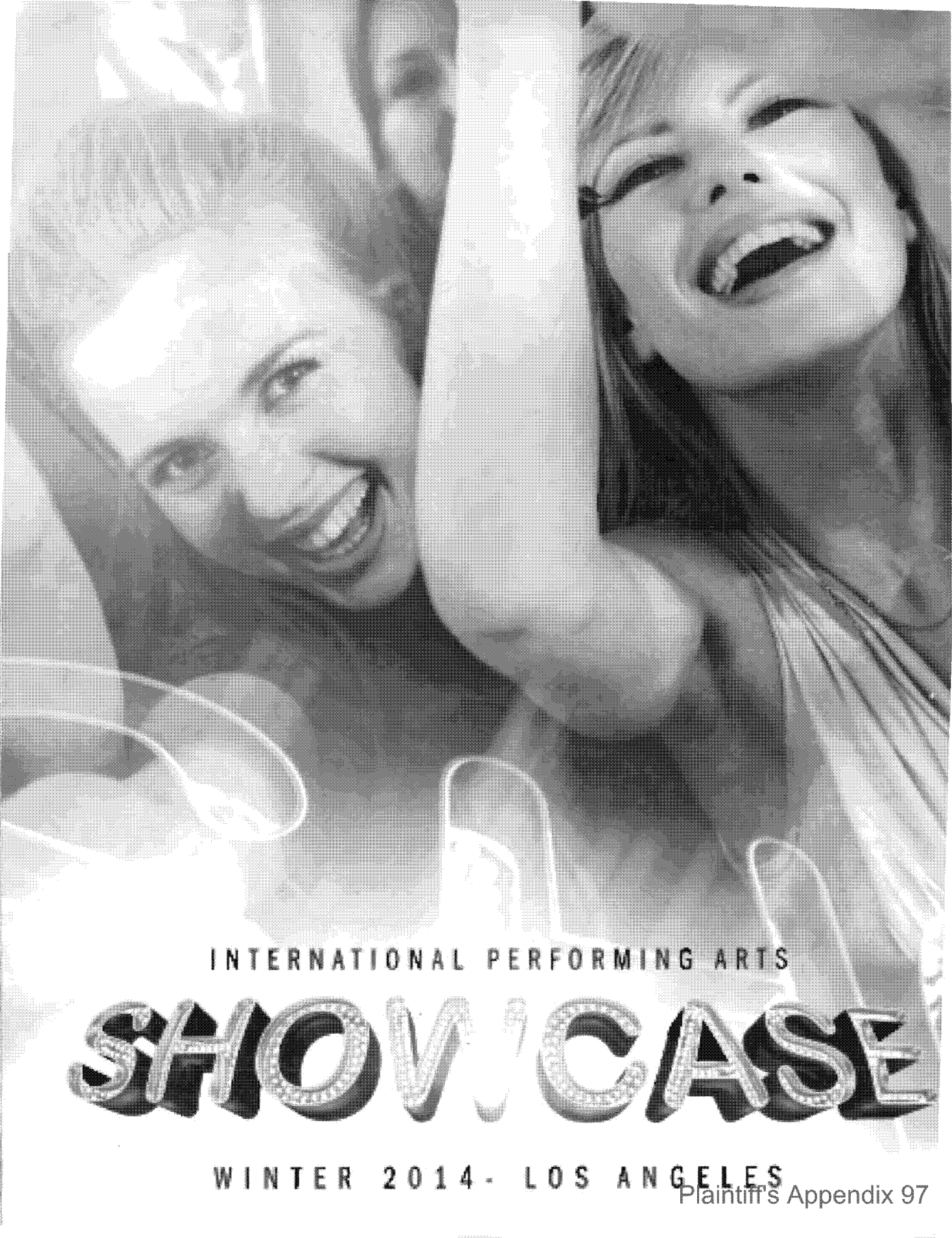
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Plaintiff's App.





INTERNATIONAL PERFORMING ARTS

# SHOWCASE

WINTER 2014 - LOS ANGELES

Plaintiff's Appendix 97

# The International Performing Arts



**CONGRATULATIONS!**

**1428**

**We are excited to present the following callbacks.**

**Cassiopeia Prod  
MP Management  
Luber Rocklin Ent.**

**On behalf of the entire Showcase Team, we thank you for helping making this showcase a success. Good Luck!**

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TABLE COMPANY

- 1 Abrams Artists
- 2 Agency 1939
- 3 Amsel, Eisenstadt and Frazier Talent Agency
- 4 Archetype
- 5 ARTISTIC ENDEAVORS
- 6 Aston Models
- 7 Bass International Asia/Europe/USA
- 8 Carol Lefko Casting
- 9 Cary Anderson Management
- ~~10~~ ~~Cassiopeia Productions - callback~~
- 11 Cast Images Model & Talent Agency
- 12 Casting By Patrick Baca, CSA
- 13 CESD Talent Agency
- 14 Clear Talent Group
- 15 DaM Legacy Entertainment
- 16 Damon Sharpe Music
- 17 FilmEngine
- 18 Hot Rock Media
- 19 HRI Talent
- 20 Industry 415 Creative
- 21 Jambo Music
- 22 JE Model and Talent
- 23 L. A. Saditte, Inc.
- 24 LA Models / LA Talent
- 25 Look Model Agency *older 14+*
- ~~26~~ ~~Luber Roklin Entertainment - callback~~
- 27 Marilyn New York
- 28 Mavrick Artists Agency
- 29 MC Talent Management
- 30 MMG
- 31 Models Direct Management
- ~~32~~ ~~MP Management - call back~~
- 33 New York Model
- 34 NEXT Model Management
- 35 PB Management
- 36 PT Management
- 37 RedOne Productions
- 38 Scott Sedita Acting Studios
- 39 Scout Model & Talent Agency *open call back - SF - took photos*
- 40 The Savage Agency
- 41 Tony G Casting
- 42 Trusik Talent Management
- 43 Vincent Cirrincione Associates
- 44 Wilhelmina Models
- 45 Wunder Agency
- 46 Zero Gravity Management

*Marka D*

*Nancy Hayes Casting*

*dm*

**PROOF OF SERVICE**

I am employed in the County of Dallas, State of Texas. I am over the age of 18 and not a party to the within action; my business address is: 4054 McKinney Avenue, Suite 310, Dallas, Texas 75204.

On March 1, 2017, I served the foregoing documents described as:

**FIFTH AMENDED CLASS ACTION COMPLAINT**

On interested parties in this action by serving a true copy addressed as follows:

Michelle L. Landry  
Constance J. Yu  
Putterman Landry + Yu LLP  
353 Sacramento Street, Suite 560  
San Francisco, California 94111  
(415) 839-8779 (telephone)  
(415) 737-1363 (facsimile)  
mlandry@plylaw.com  
cyu@plylaw.com

Zack Broslavsky  
Jonathan A. Weinman  
BROSLAVSKY & WEINMAN, LLP  
11755 Wilshire Boulevard, Suite 1250  
Los Angeles, California 90025  
zbroslavsky@bwcounsel.com  
jweinman@bwcounsel.com

*Attorneys for Defendants International  
Performing Arts Academy, LLC, Barbizon  
School of San Francisco, Inc., and Lion  
Management Group, Inc.*

David C. Parisi  
Suzanne Havens Beckman  
PARISI & HAVENS LLP  
212 Marine Street, Suite 100  
Santa Monica, California 90405  
dcparsi@parisihavens.com  
shavens@parisihavens.com

Peter Clinco  
1901 Avenue of the Stars, Suite 1100  
Los Angeles, California 90067-6002  
(310) 553-3400 (telephone)  
(310) 553-3408 (facsimile)  
peter@clinco.net

*Attorneys for Plaintiff Angelica Cosio, on her  
own behalf, and behalf of all others similarly  
situated*

**VIA ELECTRONIC SERVICE**

*Attorneys for Defendant Lion Management  
Group, Inc.*


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[x] **(VIA ELECTRONIC SERVICE)** I delivered the above described document(s) via the San Francisco Superior Court’s email service provider, File & ServeXpress, LLC, to the persons identified above.

Executed on March 1, 2017 at Dallas, Texas.

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

Dated: March 1, 2017

By:   
Ethan Preston