

**CLAIM AGAINST THE CAJON VALLEY  
UNION SCHOOL DISTRICT (“CVUSD”)**  
**(Government Code Section 910, *et seq.*)**

**Claimant:** Diana Groff, on behalf of herself and a class of others similarly situated

**Address:** c/o Law Office of Michael A. Conger  
PO Box 9374  
Rancho Santa Fe, CA 92067

**Phone No:** (858) 759-0200

**Name, address and phone  
number of person to receive  
notices and correspondence related  
to this claim:**

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**Date and time when damage  
or injury occurred:** Approximately August 2012.

**Location of occurrence:** The office of the California State Teachers’ Retirement System (CalSTRS).

**Circumstances of occurrence:** CalSTRS has notified claimant, and others similarly situated, that it intends to reduce claimant’s pension (and those of others similarly situated). CalSTRS contends that it only recently discovered that the Cajon Valley Union School District (CVUSD) “incorrectly reported (coded) [claimant’s] retirement incentive payment . . . as credible compensation to the Defined Benefit (DB) Program . . . [and] thus, it does not count toward the calculation of [claimant’s] DB retirement allowance.”

Although CalSTRS lacks legal justification for this position, and/or it was negligent, and/or breached its fiduciary duty, CVUSD was also negligent because, at a minimum:

- (1) it was negligent in its dealings and/or representations to claimant (and others similarly situated) when it represented to claimant (and others similarly situated) that the

compensation paid to claimant (and others similarly situated) would be included in claimant's pension (and the pensions of others similarly situated);

- (2) it was negligent in its dealings with CalSTRS in determining that the compensation paid to claimant (and others similarly situated) was properly to be included as compensation to be included in claimant's (and others similarly situated) pension;
- (3) alternatively, it was negligent in its dealings with CalSTRS for failing to determine that the compensation paid to claimant (and others similarly situated) was improperly to be included as compensation to be included in claimant's (and others similarly situated) pension before claimant (and others similarly situated) made indelible, permanent retirement decisions;
- (4) alternatively, it was negligent for failing to check with CalSTRS to determine whether the compensation paid to claimant (and others similarly situated) was properly to be included as compensation to be included in claimant's (and others similarly situated) pension before claimant (and others similarly situated) made indelible, permanent retirement decisions;

**Description of loss, damage  
or injury:**

Pursuant to Government Code Section 910,  
Subdivision (f) the amount exceeds \$10,000 and  
would not be a limited civil case.

**Name(s) of CALSTRS' employee(s)  
causing injury, damage or loss, if  
known:**

Unknown, but based on information and belief  
this would include primarily CalSTRS and  
CVUSD employees or agents.

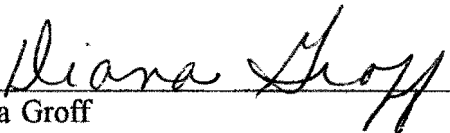
**Witnesses:**

Unknown, but based on information and belief  
this would include primarily CalSTRS and  
CVUSD employees or agents.

**Amount claimed at present including  
estimated amount of any prospective  
loss:**

Pursuant to Government Code Section 910,  
Subdivision (f) the amount exceeds \$10,000 and  
would not be a limited civil case.

Dated: November 19, 2012

  
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Diana Groff