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**FILED**  
 SUPERIOR COURT OF CALIFORNIA  
 COUNTY OF SAN BERNARDINO  
 SAN BERNARDINO DISTRICT

JAN -5 2015

BY Leanne M. Landeros  
 LEANNE M. LANDEROS, DEPUTY

6 Attorneys for Plaintiff  
 7 TEECHA CHAMBLEE

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 9 FOR THE COUNTY OF SAN BERNARDINO

Filed by Fax

10 TEECHA CHAMBLEE,  
 11 Plaintiff,  
 12  
 13 vs.  
 14 INLAND BEHAVIORAL AND HEALTH  
 SERVICES, INC, DOES 1-25, inclusive  
 15 Defendants  
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CASE NO: CIVDS 1500300  
**COMPLAINT FOR DAMAGES FOR:**  
 1. **TORTIOUS WRONGFUL  
 CONSTRUCTIVE TERMINATION  
 IN VIOLATION OF PUBLIC  
 POLICY (TAMENY CLAIM)**  
 2. **RETALIATION FOR  
 WHISTLEBLOWING ACTIVITIES  
 IN VIOLATION OF LABOR CODE  
 § 1102.5**  
**JURY TRIAL DEMANDED**  
**UNLIMITED CIVIL CASE**  
*[Amount demanded exceeds \$10,000]*

\$435<sup>00</sup>

1 Plaintiff TEECHA CHAMBLEE brings this Complaint against her former employer,  
2 Defendant INLAND BEHAVIORAL AND HEALTH SERVICES, INC. ("IBHS"), and DOES  
3 1 through 25, for retaliation and wrongful termination in violation of public policy.

4 **FACTUAL ALLEGATIONS**

5 1. The Plaintiff Teecha Chamblee, is an individual residing in San Bernardino  
6 County.

7 2. Defendant IBHS is a non-profit corporation located at 1963 North 'E' Street,  
8 San Bernardino, California 92405. IBHS assumed all responsibility for any acts of its  
9 managers, officers, agents, and employees.

10 3. Dr. Lindsey ("Dr. Lindsey") is the Chief Executive Officer of IBHS. At all  
11 times Dr. Lindsey acted within the scope of her duties as a director and officer of IBHS. Dr.  
12 Lindsey actively participated in all the wrongful or tortuous conduct alleged in this Complaint.

13 4. Dr. John Wilson ("Dr. Wilson) is the Chief Operating Officer of IBHS and at all  
14 times acted within the scope of his duties as Chief Operating Officer. Dr. Wilson actively  
15 participated or allowed all the wrongful or tortuous conduct alleged in this Complaint.

16 5. Plaintiff is unaware of the true names and capacities of Defendants sued as  
17 Does 1 through 25 and sues these Defendants by fictitious names. Plaintiff will amend this  
18 Complaint to allege the true names and capacities when ascertained. Plaintiff believes that each  
19 fictitiously named Defendant is the agent or employee of the named Defendant and in doing  
20 the acts alleged in this Complaint was acting in such capacity.

21 6. Plaintiff Teecha Chamblee is a well-educated, experienced clinic manager with  
22 a master's degree in health administration. Ms. Chamblee began employment with Defendant  
23 IBHS on December 10, 2012, and continued working at IBHS until her wrongful termination  
24 on November 1, 2013. Defendant IBHS hired Ms. Chamblee as the clinic manager. As clinic  
25 manager, Ms. Chamblee's duties included participation in quality assurance meetings, staffing  
26 of department personnel, and training and instruction.

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28

1           7.     At some point during Ms. Chamblee's employment at IBHS, Ms. Chamblee  
2 reported illegal practices and conduct being carried out at IBHS clinics to Dr. Lindsey and Dr.  
3 Wilson on many occasions. Ms. Chamblee informed Dr. Wilson and Dr. Lindsey of practices  
4 and conduct at IBHS she perceived to be illegal or not in compliance with state and federal  
5 regulations. These practices and conduct included but were not limited to:

- 6           (a)     calculation of food stamps as income to adjust patient's incomes in order to  
7                    charge higher fee amounts for clinical care;
- 8           (b)     unsafe working conditions for outreach workers enrolling new patients;
- 9           (c)     charges for patient visits already covered by local and state programs;
- 10          (d)     a clinic doctor's failure to make patient chart entries which jeopardized patient  
11                    safety;
- 12          (e)     charging "no-show" fees to Medi-Cal patients when they missed appointments,  
13                    and
- 14          (f)     other illegal and excessive charges on clinic patients.

15          8.     Despite Ms. Chamblee's reported objections to many of the above illegal  
16 practices and conduct, Dr. Lindsey continued to implement and instruct IBHS employees to  
17 continue with the above practices and conduct despite Dr. Lindsey's knowledge that they were  
18 illegal or against regulations.

19          9.     Dr. Wilson knew of the illegal practices and conduct but failed to take any  
20 action. Dr. Wilson ratified all decisions and judgments made by Dr. Lindsey.

21          10.    On or around August 2013, Dr. Lindsey constructively demoted Ms.  
22 Chamblee's position as clinic manager. Dr. Lindsey excluded Ms. Chamblee from meetings,  
23 refused to communicate with Ms. Chamblee, denied Ms. Chamblee access to certain parts of  
24 the building, and also stopped delegating tasks to Ms. Chamblee. Dr. Lindsey retaliated against  
25 Ms. Chamblee because Ms. Chamblee refused to implement and reported the illegal practices  
26 and conduct at IBHS. Ms. Chamblee complained to Dr. Wilson regarding Dr. Lindsey's  
27 retaliation and her lack of job duties and Dr. Wilson told Ms. Chamblee to, "just come in and  
28 sit in [her] office."

1 11. Ms. Chamblee resigned on November 1, 2013, as a result of Dr. Lindsey's  
2 retaliatory constructive demotion after Ms. Chamblee reported and refused to carry out things  
3 that she perceived to be illegal or against local, state, and federal regulations.

4 **FIRST CAUSE OF ACTION**

5 **CONSTRUCTIVE WRONGFUL TERMINATION IN VIOLATION**

6 **OF PUBLIC POLICY**

7 **(Against Defendant IBHS)**

8 12. Plaintiff, Teecha Chamblee, re-alleges and incorporates by reference herein, all  
9 of the allegations in paragraphs 1 through 11, inclusive of this complaint.

10 13. CEO Dr. Lindsey, and COO Dr. Wilson, acting within the scope of their duties  
11 as officers of IBHS, knowingly instructed Plaintiff to implement practices that defrauded local,  
12 state, and federal funded programs.

13 14. Plaintiff acted with a public purpose when she refused to defraud the  
14 government and reported the fraud to her CEO and COO of IBHS.

15 15. The entire public stands to benefit when fraud against the government is  
16 exposed or refused to be carried out.

17 16. These policies included but was not limited to improper billing of Medi-Cal  
18 patients.

19 17. Plaintiff refused to implement the illegal or non-compliant practices and  
20 repeatedly informed the CEO and COO of IBHS that such practices were illegal or non-  
21 compliant.

22 18. Rather than risk her reputation or face potential legal consequences for the  
23 illegal practices taking place at IBHS, Plaintiff resigned at IBHS from her role as clinic  
24 manager.

25 19. A reasonable employee in Plaintiff's position would have no reasonable  
26 alternative except to quit because the requirement that Plaintiff instruct employees under her  
27 supervision to defraud the government constituted an egregious condition of employment.

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1 20. Defendant IBHS's wrongful conduct described above caused Plaintiff to suffer  
2 ongoing injuries including, but not limited to, lost income and benefits, humiliation,  
3 embarrassment, mental and emotional distress, and discomfort; all according to proof at trial.

4 21. The CEO and COO of Defendant IBHS acted with malice, oppression, or fraud  
5 and Plaintiff requests punitive damages.

6 22. Plaintiff also requests attorneys' fees pursuant to Code of Civil Procedure  
7 Section 1021.5, because Plaintiff is vindicating and enforcing a significant benefit to the public  
8 by whistleblowing against defrauding of local, state, and federal government programs.

9 **SECOND CAUSE OF ACTION**

10 **RETALIATION IN VIOLATION OF LABOR CODE SECTION 1102.5**

11 **(Against Defendant IBHS)**

12 23. Plaintiff, Teecha Chamblee, re-alleges and incorporates by reference herein, all  
13 of the allegations in paragraphs 1 through 22, inclusive of this complaint.

14 24. CEO Dr. Lindsey and COO Dr. Wilson acting within the scope of their duties as  
15 officers of IBHS, retaliated against Plaintiff because Plaintiff reported practices at IBHS that  
16 Plaintiff perceived to violate federal or state statutes or practices that were non-compliant with  
17 local, state, or federal regulations.

18 25. Dr. Lindsey and Dr. Wilson acting on behalf of IBHS also retaliated against  
19 Plaintiff because Plaintiff refused to instruct employees under her supervision to defraud local,  
20 state, and federal programs.

21 26. Dr. Lindsey and Dr. Wilson constructively demoted Plaintiff from her position  
22 as clinic manager.

23 27. Rather than risk her reputation or face potential legal consequences for the  
24 illegal practices taking place at IBHS; Plaintiff resigned at IBHS from her role as clinic  
25 manager.

26 28. A reasonable employee in Plaintiff's position would have no reasonable  
27 alternative except to quit because the requirement that Plaintiff instruct employees under her  
28 supervision to defraud the government constituted an egregious condition of employment.

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1 29. Defendant's wrongful conduct described above caused Plaintiff to suffer  
2 ongoing injuries, including but not limited to, lost income and benefits, humiliation,  
3 embarrassment, mental and emotional distress, and discomfort; all according to proof a trial.

4 30. Defendant acted in a malicious, oppressive and intentional manner and Plaintiff  
5 requests an assessment of punitive damages.

6 31. Plaintiff also requests attorneys' fees pursuant to Code of Civil Procedure  
7 Section 1021.5, because Plaintiff is vindicating and enforcing a significant benefit to the public  
8 by whistleblowing against defrauding of local, state, and federal government programs.

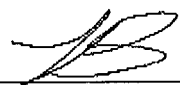
9 **PRAYER FOR RELIEF**

10 **WHEREFORE**, Plaintiff prays judgment against Defendants and each of them as  
11 follows:

- 12 1. For general damages according to proof;
- 13 2. For special damages according to proof;
- 14 3. For punitive damages;
- 15 4. For restitutionary relief;
- 16 5. For interest at the legal rate pursuant to applicable State law; or according to  
17 proof at trial;
- 18 6. For reasonable attorneys' fees and costs;
- 19 7. For such further relief that this Court deems just and proper

20  
21 Dated: December 31, 2014

WAGNER & PELAYES, LLP

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24 \_\_\_\_\_  
25 TRISTAN G. PELAYES, Esq.  
26 TYLER J. BUCK, Esq.  
27 Attorneys for Plaintiff  
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