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10 Attorneys for Plaintiff

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

TRACY PALMERO,

Plaintiff,

vs.

USA SWIMMING, INC., a Colorado corporation; SOUTHERN CALIFORNIA SWIMMING, INC., a California corporation; SOCAL AQUATICS ASSOCIATION, a California corporation; EVERETT UCHIYAMA, an individual; and DOES 1 through 25, inclusive,

Defendants.

Case No.

COMPLAINT FOR DAMAGES

- (1) Sexual Assault of a Minor**
(2) Negligence

Plaintiff TRACY PALMERO alleges against USA SWIMMING, INC., a Colorado corporation; SOUTHERN CALIFORNIA SWIMMING, INC., a California corporation; SOCAL AQUATICS ASSOCIATION, a California corporation; EVERETT UCHIYAMA, an individual; and DOES 1 through 25, inclusive, as follows:

COMMON ALLEGATIONS

1. Plaintiff TRACY PALMERO was groomed for sexual abuse her by her swim coach, EVERETT UCHIYAMA [“UCHIYAMA”] from the time she was 14-years-old. UCHIYAMA began sexually assaulting plaintiff at the age of 16 years, and thereafter kept her in a dominated relationship for years after she reached the age of majority.

1 2. Defendant USA SWIMMING, INC. [“USA SWIMMING”] is a Colorado
2 corporation with its principal place of business in Colorado Springs, Colorado. At all times
3 mentioned herein, USA SWIMMING was doing business in the County of Orange. USA
4 SWIMMING was originally known as The Competitive Swimming Committee of the AAU,
5 Inc. It was incorporated on May 4, 1977 for the purposes of promoting and improving amateur
6 swimming in the United States, to develop interest and participation in amateur swimming
7 throughout the United States, and to provide competitive swimming opportunities for all ages,
8 sexes, and levels of ability, including international competition. In 1978, as a result of the
9 passage of the Amateur Sports Act, also known as the Ted Stevens Act, USA SWIMMING
10 became the National Governing Body [“NGB”] for competitive swimming in the United States.
11 As NGB for the sport of swimming, USA SWIMMING is responsible for the conduct and
12 administration of the sport in the United States. At the local level, there are approximately fifty-
13 nine (59) Local Swimming Committees [“LSC”] that administer USA SWIMMING activities
14 for designated regions in the United States. USA SWIMMING formulates rules and
15 implements policies and procedures for the LSCs. All of USA SWIMMING’s administrators,
16 employees and/or board directors are mandated reporters under California Penal Code
17 §11165.7(a)(7) or (8), and are thereby required to report any reasonable suspicion of sexual
18 assault upon a child.

19 3. Defendant SOUTHERN CALIFORNIA SWIMMING, INC. [“SCS”] is a
20 California corporation with its principal place of business in the City of San Pedro, State of
21 California. SCS is one of the 59 LSCs within USA SWIMMING and is bound by USA
22 SWIMMING’s rules, policies and procedures. It serves Los Angeles, Orange, Riverside, San
23 Bernardino, San Luis Obispo, Santa Barbara, and Ventura counties, plus the Southern Nevada
24 counties of Clark, Esmeralda, Lincoln and Nye. SCS has the largest membership of all LSCs
25 with about 25,000 athletes, coaches, officials and parent volunteers. SCS is bound by USA
26 Swimming’s rules governing safety of its members. All of SCS’s administrators, employees
27 and/or board directors are mandated reporters under California Penal Code §11165.7(a)(7) or
28 (8), and are thereby required to report any reasonable suspicion of sexual assault upon a child.

1 4. Defendant SOCAL AQUATICS ASSOCIATION [“SOCAL AQUATICS”] is a
2 California corporation with its principal place of business in the City of Tustin, County of
3 Orange, State of California. SOCAL AQUATICS was, at all relevant times, a local swim club
4 bound by the rules, policies, and procedures of SCS and USA SWIMMING. All of SOCAL
5 AQUATICS’ administrators, employees and/or board directors are mandated reporters under
6 California Penal Code §11165.7(a)(7) or (8), and are thereby required to report any reasonable
7 suspicion of sexual assault upon a child.

8 5. Defendant EVERETT UCHIYAMA [“UCHIYAMA”] was, at all relevant times,
9 a USA SWIMMING approved, certified and/or registered swim coach, entrusted with the care
10 and safety of its female, minor members, including plaintiff.

11 6. Plaintiff TRACY PALMERO [DOB: August 11, 1973] was, at all relevant times,
12 a California resident and a member of USA SWIMMING, SCS, and SOCAL AQUATICS.

13 7. The sexual abuse of minor swimmers by coaches has been a chronic problem
14 within USA SWIMMING since nearly the beginning of the organization’s existence. In the
15 1980s and early 1990s, stories circulated in the swimming community of national level coaches
16 sexual abusing their young female swimmers. In or about early 1991, USA SWIMMING
17 formed a committee to address a variety of abuses existing in the sport, including the sexual
18 abuse of minor swimmers. That committee, which met in or around May of 1991,
19 acknowledged that sexual misconduct was a major problem pervasive in the sport and that there
20 was a specific problem with coaches and non-professional persons performing rubdown
21 massages on female minor athletes. The committee recommended that USA SWIMMING
22 enact legislation to address coaches convicted and/or accused of sexual abuse; implement rules
23 preventing coaches and non-trained persons from performing inappropriate rubdown massages
24 on athletes at meets; and educate athletes on the topics of sexual harassment and sexual
25 misconduct. USA SWIMMING failed to implement any of the recommended measures.

26 8. Despite years of knowledge of childhood sexual abuse in the sport of swimming,
27 USA SWIMMING did not implement any child abuse prevention policies or procedures,
28 including basic measures such as mandatory background checks or codes of conduct, for several

1 years.

2 9. Plaintiff joined SOCAL AQUATICS on or around August 1987 when she was
3 14-years-old and began training under its head coach, UCHIYAMA.

4 10. While coaching at SOCAL AQUATICS, UCHIYAMA openly engaged in highly
5 inappropriate and sexual behavior with his minor female swimmers. UCHIYAMA performed
6 full-body massages on girls from ages 14 to 17 in his office and the pool deck wherein he lifted
7 their swimsuit straps, he kissed female athletes on the lips, he changed out of his speedo during
8 workouts, and showered in the girl's locker room. It was not unusual for UCHIYAMA to drive
9 minor female swimmers to practices with no other adults present. UCHIYAMA often spoke to
10 his young, female swimmers like a husband speaks to his wife and made it a habit to fraternize
11 with them outside of swimming events/practices. For example, he would go to dinners and the
12 movies with them.

13 11. Plaintiff is informed and believes, and thereon alleges, that before UCHIYAMA
14 began coaching at SOCAL AQUATICS, he was terminated from his position at another swim
15 club under the jurisdiction of SCS and USA SWIMMING because he engaged in inappropriate
16 grooming behavior and/or sexual misconduct with a minor female.

17 12. Plaintiff is informed and believe and thereon alleges that beginning in the late
18 1980's SCS and USA SWIMMING knew, had reason to know, or was otherwise on notice that
19 UCHIYAMA was engaging in highly inappropriate grooming behavior with his minor female
20 athletes.

21 13. UCHIYAMA used his trusted position as head swim coach to manipulate
22 plaintiff. He began overtly grooming plaintiff in preparation for his future sexual advances
23 when she was a naïve 14 year old girl. UCHIYAMA would give plaintiff long hugs, engage in
24 personal conversations with her, perform rubdowns on her, and give her special attention and
25 affection.

26 14. In early 1990, plaintiff became eligible to compete in USA SWIMMING's
27 Junior Nationals competition in Iowa. She was the only member on her team to qualify for this
28 prestigious event. Unfortunately, plaintiff's parents could not attend the event.

1 15. About a week before Junior Nationals, the Executive Director of SCS was
2 notified that plaintiff was the only member of her club invited to Junior Nationals and that she
3 was planning on traveling alone to the event with her swim coach. Said Executive Director
4 admitted that there was no code of conduct in place but that the organization was working on it.
5 No action was taken prior to plaintiff's departure to protect her in any way.

6 16. UCHIYAMA and plaintiff traveled alone together to Junior Nationals. SOCAL
7 AQUATICS paid for the trip, but refused to pay for two rooms and as a result UCHIYAMA and
8 plaintiff had to share a room for the four-day trip. During said trip while UCHIYAMA and
9 plaintiff were in the same hotel room, UCHIYAMA lay in the bed with plaintiff and hugged her
10 inappropriately. At the competition, UCHIYAMA engaged in overtly sexual, inappropriate
11 behavior with plaintiff, including performing rubdowns on her on the pool deck.

12 17. After Junior Nationals, UCHIYAMA's sexual assaults quickly escalated in their
13 nature and frequency. By the time plaintiff reached the age of 17.5, UCHIYAMA was engaged
14 in a full-blown sexual relationship with her. Many of the sexual encounters occurred shortly
15 after swim practices. UCHIYAMA and plaintiff would often drive together from swim practice
16 to his residence to have sex. Some of the sexual misconduct occurred at USA SWIMMING and
17 SCS events.

18 18. UCHIYAMA continued to have a sexual relationship with plaintiff after she
19 reached the age of 18. Due to UCHIYAMA's position of power and control over plaintiff, and
20 the psychological effects imposed upon her by childhood sexual abuse, it took several years for
21 plaintiff to realize she was betrayed by her trusted mentor.

22 19. In or about 1999, information circulated amongst the swimming community at
23 SOCAL AQUATICS that UCHIYAMA was having an intimate relationship with another
24 young, female swimmer. SOCAL AQUATIC's Board of Directors learned of the allegations
25 and began investigating the matter.

26 20. UCHIYAMA abruptly left SOCAL AQUATICS and moved to Colorado
27 Springs, Colorado to work at USA SWIMMING's headquarters as its National Team
28 Coordinator. In or around 2004, USA SWIMMING promoted UCHIYAMA to National Team

1 Director, the person in charge with overseeing all aspects of USA SWIMMING's national team
2 program.

3 21. On January 24, 2006, plaintiff notified USA SWIMMING that UCHIYAMA
4 sexually abused her as a child. Plaintiff provided a thorough, written account of her experience
5 with UCHIYAMA. Upon receiving the complaint, USA SWIMMING was required by its rules
6 to conduct an investigation into the matter. Based on that investigation, both plaintiff and
7 UCHIYAMA were entitled to a hearing before USA SWIMMING's National Board of Review.

8 22. On January 25, 2006, USA SWIMMING's Executive Director Chuck Wielgus
9 confronted UCHIYAMA in person about plaintiff's allegations. UCHIYAMA did not deny
10 them. Two days later, Mr. Wielgus, on behalf of USA SWIMMING, entered in a release
11 agreement with UCHIYAMA wherein UCHIYAMA agreed to resign from his employment
12 with USA SWIMMING and not contest the permanent banning of his membership. In
13 exchange, USA SWIMMING agreed that it would not conduct any further investigation into
14 plaintiff's allegations.

15 23. With this agreement, USA SWIMMING was able to quietly remove
16 UCHIYAMA without public scrutiny. When it announced UCHIYAMA's resignation it did not
17 mention anything about the credible sexual abuse allegations asserted against him.
18 Additionally, USA SWIMMING did not warn the swimming community that UCHIYAMA was
19 banned from the sport of swimming for sexual misconduct nor did it report to law enforcement
20 plaintiff's childhood sexual abuse allegations.

21 24. Less than a year after the revocation of UCHIYAMA's membership, a high-
22 ranking USA SWIMMING official, Pat Hogan, highly recommended UCHIYAMA for a job
23 position at The Country Club of Colorado, about five miles from USA SWIMMING's
24 headquarters. Mr. Hogan told The Country Club of Colorado that UCHIYAMA was
25 "fantastic," "great people person," and "most popular employee in org." Mr. Hogan said it was
26 UCHIYAMA's personal choice to leave the organization. UCHIYAMA became the director of
27 aquatics at The Country Club of Colorado where he was again given access to young, female
28 swimmers.

1 25. Plaintiff's father later learned that UCHIYAMA was working as director of
2 aquatics at The Country Club of Colorado and notified Mr. Wielgus in or around April 30,
3 2010. Plaintiff's father urged Mr. Wielgus to contact the country club and make
4 UCHIYAMA's ban public. Mr. Wielgus dismissed his request.

5 26. USA SWIMMING did not make UCHIYAMA's ban public until late 2010 when
6 it feared the media would blast the organization for covering up UCHIYAMA's behavior.

7 27. The true names and/or capacities, whether individual, corporate, associate, or
8 otherwise, of defendants named herein as DOES 1 through 25, inclusive are unknown to
9 plaintiff at this time, and plaintiff therefore sues said defendants by such fictitious names.
10 Plaintiff will seek leave to amend this Complaint to allege their true names and capacities when
11 the same have been ascertained. Plaintiff is informed and believes and thereon alleges that each
12 of the defendants designated herein as a DOE is responsible in some manner or is otherwise
13 legally liable to plaintiff for the injuries complained of herein.

14 28. At all times herein mentioned, some or all of the defendants was an agent,
15 servant, employee, partner, alter ego, joint venture, franchisee, aider and abettor, and/or co-
16 conspirator, and engaged in a common or common enterprises with each of the remaining
17 defendants herein, and was at all relevant times acting within the course and scope of said
18 agency, service, employment, partnership, joint venture, franchise, unlawful enterprise,
19 conspiracy and/or other lawful or unlawful conduct as herein alleged.

20 29. Plaintiff is now 46 years of age. Plaintiff's action is one for damages as a result
21 of childhood sexual assault for which the statute of limitations has been extended pursuant to
22 Code of Civil Procedure §340.1(q). Plaintiff has complied with the provisions of Code of Civil
23 Procedure §340.1(f), (g) and (h). Plaintiff's counsel executed certificates of merit as to all
24 defendants, which are attached hereto as **Exhibit 1**. A licensed mental health practitioner
25 executed a certificate of merit as to plaintiff's action which is attached hereto as **Exhibit 2**.

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1 **FIRST CAUSE OF ACTION**

2 **Sexual Assault of a Minor**

3 As and for a First Cause of Action, Plaintiff alleges against defendants USA
4 SWIMMING, INC., EVERETT UCHIYAMA, and DOES 1 through 5 as follows:

5 30. Plaintiff hereby incorporates all paragraphs of the Common Allegations, as
6 though set forth in full herein.

7 31. As a minor entrusted to the care of defendants, a special relationship existed by
8 which defendants were obligated to protect her from harm.

9 32. UCHIYAMA used his position of trust and authority as a swim coach to groom
10 plaintiff for his sexual advances and thereafter committed lewd and lascivious acts upon
11 plaintiff and/or sexually abused, molested, and/or improperly touched plaintiff.

12 33. USA SWIMMING ratified UCHIYAMA's conduct by failing to repudiate his
13 predatory behavior and/or sexual assaults by, *inter alia*, selecting UCHIYAMA to be its
14 National Team Coordinator and National Team Director after UCHIYAMA was forced to leave
15 two local swim club for engaging in sexual misconduct with female minor swimmers, failing to
16 report his sexual misconduct with minors to the authorities, concealing his predatory behavior
17 from the public and the swimming community, and recommending him for a job position as an
18 aquatics director at a swim organization that involved access to minors.

19 34. As a legal result of the foregoing, plaintiff was injured in health, strength and
20 activity, sustaining bodily injuries and shock and injury to her nervous system and person, all of
21 which caused and continue to cause plaintiff great mental, physical and nervous pain and
22 suffering; plaintiff has thereby sustained damages in an amount in excess of the minimum
23 jurisdictional limits of this court.

24 35. As a further legal result of the conduct of the defendants, and each of them,
25 plaintiff was required to and did employ physicians and counselors for examination, treatment
26 and care, and incurred, and will continue in the future to incur, medical and incidental expenses,
27 including counseling costs, the exact amount of which is unknown to plaintiff at this time.

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1 volunteers on inappropriate behaviors between adult coaches and minor members [such as
2 driving alone with a minor to and from events], failing to implement and/or enforce proper
3 policies and procedures for the protection of minor swimmers, failing to report inappropriate
4 behaviors to the authorities for proper investigation, failing to intervene on plaintiff's behalf,
5 failing to ban UCHIYAMA from the sport of swimming, and/or, failing to notify plaintiff and
6 others in the swimming community of the risk UCHIYAMA posed to young female swimmers.

7 41. As a legal result of defendants' acts and/or omissions, plaintiff sustained injuries
8 and damages as hereinbefore alleged.

9 **PRAYER**

10 WHEREFORE, Plaintiff prays for judgment as follows:

- 11 1. For all special and all other economic damages according to proof;
- 12 2. For general damages and other non-economic relief, according to proof;
- 13 3. For punitive damages against defendants USA SWIMMING and UCHIYAMA;
- 14 4. For prejudgment interest, as allowed by law;
- 15 5. For costs of suit herein; and,
- 16 6. For such other and further relief as the court may deem fit and proper.

17
18 Dated: May 26, 2020

CORSIGLIA, MCMAHON & ALLARD LLP

19
20 By: 

21 B. ROBERT ALLARD
22 MARK J. BOSKOVICH
23 Attorneys for Plaintiff
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EXHIBIT 1

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11 Attorneys for Plaintiff

12 SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

13 TRACY PALMERO,

14 Plaintiff,

15 vs.

16 USA SWIMMING, INC., a Colorado
17 corporation; SOUTHERN CALIFORNIA
18 SWIMMING, INC., a California corporation;
19 SOCAL AQUATICS ASSOCIATION, a
20 California corporation; EVERETT
21 UCHIYAMA, an individual; and DOES 1
22 through 25, inclusive,

23 Defendants.

Case No.

**ATTORNEY CERTIFICATE OF MERIT
RE: DEFENDANT USA SWIMMING,
INC. [CCP §340.1(f)]**

24 I, MARK J. BOSKOVICH, do hereby declare and certify:

- 25 1. I am the attorney for plaintiff Tracy Palmero in the above-entitled action.
- 26 2. I have reviewed the facts of the case filed on behalf of plaintiff against
27 defendant USA Swimming, Inc.
- 28 3. I have consulted with Dr. Steven Elig about this case. Dr. Elig is a mental
health practitioner licensed to practice in California and is not a party to this lawsuit. I
reasonably believe Dr. Elig is knowledgeable of the relevant facts and issues involved in this
particular action.

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11 Attorneys for Plaintiff

12 SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

13 TRACY PALMERO,

14 Plaintiff,

15 vs.

16 USA SWIMMING, INC., a Colorado
17 corporation; SOUTHERN CALIFORNIA
18 SWIMMING, INC., a California corporation;
19 SOCAL AQUATICS ASSOCIATION, a
20 California corporation; EVERETT
21 UCHIYAMA, an individual; and DOES 1
22 through 25, inclusive,

23 Defendants.

Case No.

**ATTORNEY CERTIFICATE OF MERIT
RE: DEFENDANT SOUTHERN
CALIFORNIA SWIMMING, INC. [CCP
§340.1(f)]**

24 I, MARK J. BOSKOVICH, do hereby declare and certify:

25 1. I am the attorney for plaintiff Tracy Palmero in the above-entitled action.

26 2. I have reviewed the facts of the case filed on behalf of plaintiff against defendant
27 Southern California Swimming, Inc.

28 3. I have consulted with Dr. Steven Elig about this case. Dr. Elig is a mental health
practitioner licensed to practice in California and is not a party to this lawsuit. I reasonably
believe Dr. Elig is knowledgeable of the relevant facts and issues involved in this particular
action.

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4. Based on my review of the facts of this case and my consultation with Dr. Elig, I believe that there is reasonable and meritorious cause for filing the action against defendant Southern California Swimming, Inc.

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

Dated: May 21, 2020

CORSIGLIA, MCMAHON & ALLARD LLP

By: 
MARK J. BOSKOVICH
Attorneys for Plaintiff

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2 **MARK J. BOSKOVICH (#298688)**
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11 Attorneys for Plaintiff

12 SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

13 TRACY PALMERO,

14 Plaintiff,

15 vs.

16 USA SWIMMING, INC., a Colorado
17 corporation; SOUTHERN CALIFORNIA
18 SWIMMING, INC., a California corporation;
19 SOCAL AQUATICS ASSOCIATION, a
20 California corporation; EVERETT
21 UCHIYAMA, an individual; and DOES 1
22 through 25, inclusive,

23 Defendants.

Case No.

**ATTORNEY CERTIFICATE OF MERIT
RE: DEFENDANT SOCAL AQUATICS
ASSOCIATION [CCP §340.1(f)]**

24 I, MARK J. BOSKOVICH, do hereby declare and certify:

25 1. I am the attorney for plaintiff Tracy Palmero in the above-entitled action.

26 2. I have reviewed the facts of the case filed on behalf of plaintiff against defendant
27 SoCal Aquatics Association.

28 3. I have consulted with Dr. Steven Elig about this case. Dr. Elig is a mental health
practitioner licensed to practice in California and is not a party to this lawsuit. I reasonably
believe Dr. Elig is knowledgeable of the relevant facts and issues involved in this particular
action.

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4. Based on my review of the facts of this case and my consultation with Dr. Elig, I believe that there is reasonable and meritorious cause for filing the action against defendant SoCal Aquatics Association.

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

Dated: May 21, 2020

CORSIGLIA, MCMAHON & ALLARD LLP

By: 
MARK J. BOSKOVICH
Attorneys for Plaintiff

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2 **MARK J. BOSKOVICH (#298688)**
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11 Attorneys for Plaintiff

12 SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

13 TRACY PALMERO,

14 Plaintiff,

15 vs.

16 USA SWIMMING, INC., a Colorado
17 corporation; SOUTHERN CALIFORNIA
18 SWIMMING, INC., a California corporation;
19 SOCAL AQUATICS ASSOCIATION, a
20 California corporation; EVERETT
21 UCHIYAMA, an individual; and DOES 1
22 through 25, inclusive,

23 Defendants.

Case No.

**ATTORNEY CERTIFICATE OF MERIT
RE: DEFENDANT EVERETT
UCHIYAMA [CCP §340.1(f)]**

24 I, MARK J. BOSKOVICH, do hereby declare and certify:

25 1. I am the attorney for plaintiff Tracy Palmero in the above-entitled action.

26 2. I have reviewed the facts of the case filed on behalf of plaintiff against defendant
27 Everett Uchiyama.

28 3. I have consulted with Dr. Steven Elig about this case. Dr. Elig is a mental health
practitioner licensed to practice in California and is not a party to this lawsuit. I reasonably
believe Dr. Elig is knowledgeable of the relevant facts and issues involved in this particular
action.

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4. Based on my review of the facts of this case and my consultation with Dr. Elig, I believe that there is reasonable and meritorious cause for filing the action against defendant Everett Uchiyama.

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

Dated: May 21, 2020

CORSIGLIA, MCMAHON & ALLARD LLP

By: 

MARK J. BOSKOVICH
Attorneys for Plaintiff

EXHIBIT 2

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10 Attorneys for Plaintiff

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SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

TRACY PALMERO,

Plaintiff,

vs.

USA SWIMMING, INC., a Colorado corporation; SOUTHERN CALIFORNIA SWIMMING, INC., a California corporation; SOCAL AQUATICS ASSOCIATION, a California corporation; EVERETT UCHIYAMA, an individual; and DOES 1 through 25, inclusive,

Defendants.

Case No.

**LICENSED MENTAL HEALTH
PRACTITIONER CERTIFICATE OF
MERIT [CCP §340.1(f)]**

I, STEVEN A. ELIG, M.D., do hereby declare and certify:

1. I am a California licensed mental health care practitioner. I currently practice in the state of California.

2. I am not a party to this lawsuit.

3. I am not currently treating, nor have I ever treated, plaintiff.

4. I have interviewed plaintiff Tracy Palmero and I have general knowledge of the relevant facts and issues raised in this particular lawsuit.

5. In my professional opinion, based on my knowledge of the relevant facts and issues raised in this particular lawsuit and my interview of plaintiff, there is a reasonable basis

1 to believe that plaintiff was subjected to childhood sexual abuse by defendant Everett
2 Uchiyama.

3 I declare under penalty of perjury, and pursuant to the laws of the state of California,
4 that the foregoing is true and correct and that the certificate was executed on May 21, 2020, at
5 La Jolla, California.

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7 
8 _____
9 STEVEN A. ELIG, M.D.

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