

# PARKER · STANBURY LLP

ATTORNEYS AT LAW

444 SOUTH FLOWER STREET

NINETEENTH FLOOR

LOS ANGELES, CA 90071-2901

TELEPHONE (213) 622-5124

FAX (213) 622-4858

E-MAIL: LA@PARKSTAN.COM

DOUGLASS H. MORI  
JOHN D. BARRETT, JR. \*  
J. LUIS GARCIA †  
DAVID E. COWAN  
GEORGE A. HUNLOCK  
RICARDO A. MERCADO  
MATTHEW W. DAVIS  
REYNALDO C. SANTOS  
B. PETER LEE  
MARCUS BASTIDA  
ROSEMARIE MERRILL  
DAVID C. LANE  
MATHEW L. MAY  
ALEX L. SHIA

GLENN M. HABAS  
JAMES L. WOLFSEN  
KELLY A. SHERIDAN  
HANS W. CHEN  
AARON U. FREEMAN  
GREGORY T. FONG  
JOSEPH R. SERPICO  
ROCCO A. PAPALIA  
MELANIE M. BUTLER  
CLAUDIA M. PALENCIA  
KRISTOFFER M. GARRISON  
MICHAEL COMPTON  
ELIZABETH R. VOASE  
CARL H. STARRETT II

SHARIE ZAHAB  
ALEXIS MOORE  
LINDA IRELAND  
BRIDGET ESQUIBIAS  
GABRIELA CARRILLO  
JEFF H. GREEN  
MATTHEW T. SALABEN

*OF COUNSEL:*

SANAM NAVAB  
MEGAN E. GALLAGHER  
LARS F. KUSHNER  
PATRICIA MILLER

KYLE C. BENKIE  
LINDA H. MUCHAMEL  
LAURIE HOWELL  
ANTHONY F. SGHERZII

\* ASSOCIATE IN AMERICAN BOARD OF TRIAL ADVOCATES

† MEMBER OF AMERICAN BOARD OF TRIAL ADVOCATES

HARRY D. PARKER (1891-1976)  
RAYMOND G. STANBURY (1904-1966)

June 18, 2025

## VIA U.S. MAIL AND ELECTRONIC MAIL

[sohail.eftekharzadeh@clarvida.com](mailto:sohail.eftekharzadeh@clarvida.com)

Clarvida Wellness Center  
401 South Tustin Street  
Orange, CA 92866

Dear Sir/Madam:

Re:

████████████████████  
Your Member No.: 8234

Our File No.: CA1-NDS-J3K

Please be advised that Ms. ██████████ has recently consulted with our office regarding her demand.

Specifically, Ms. ██████████ informs us that she is a member-patient of your organization. Ms. ██████████ further informs us that, although you receive federal funding, you have aggressively prohibited Christian activities while you proactively promoted gay pride activities for your member-patients. Ms. ██████████ reveals to us that your personnel have forced LGBTQ activities on some of your member-patients who have severe and profound cognitive delays and that you do not offer, for all practical purposes, an alternative activity despite objections from you member-patients. Ms. ██████████ feels bullied and harassed for her Christian beliefs and values. This is highly unacceptable to Ms. ██████████ as she supplies us with her enclosed statement. Therefore, at this time, in order to avoid further legal action, Ms. ██████████ hereby demands that **you immediately and fully allow her to present counter-points or her opposition to the event being celebrated. Ms. ██████████ further demands that Clarvida Wellness Center allow her to read from the Judeo- Christian Bible – i.e. both the Old and New Testament at your event that is taking place and distribute literature from a Christian perspective and articulate her deeply held beliefs about gender and sexuality.**

In every contract there is an implied covenant of good faith and fair dealing by each party not to do anything which will deprive the other parties of the benefit of the contract. *Sutherland v. Barclays American/Mortgage Corp.*, 53 Cal. App. 4th 299, 314, 61 Cal. Rptr. 2d 614 (1997). A party to a contract breaches the implied covenant of good faith and fair dealing by interfering with or failing to cooperate with the plaintiff in the performance of the contract.

Nothing in this letter should be construed as a waiver of any rights or remedies in this matter, all of which are expressly reserved. Moreover, please be advised that this letter is written pursuant to California Evidence Code § 1152, and any and all information and documentation submitted herein is for the purposes of settlement only, and nothing contained herein may be utilized in the subject proceeding.

This is a formal demand on behalf of Ms. ██████████ that Clarvida Wellness Center investigate the facts and circumstances surrounding this matter and provide her with an appropriate response to her concerns. Such a response must include your immediate compliance with her aforementioned demand.

June 18, 2025

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Ms. [REDACTED] has been made fully aware of her rights and your obligations/potential liabilities under the law. Please respond to us in writing within ten (10) business days of this letter. Please feel free to email us at [LA@PARKSTAN.COM](mailto:LA@PARKSTAN.COM) and be sure to include our above-referenced file number of CA1-NDS-J3K in the subject line of your email. Your prompt attention to this matter is greatly appreciated.

Very truly yours,

PARKER · STANBURY LLP

A handwritten signature in blue ink, appearing to read "Hans W. Chen", is displayed on a light blue rectangular background.

By

HANS W. CHEN

cc: Ms. [REDACTED] [REDACTED] – *Via Email*

Enclosure.

**Clarvida Wellness Center services Patients but calls them members.  
They are assigned serial numbers that are basically the equivalent of a Medical Record Number (MRN).**

**The Social Agreement is used as a substitute for a Patients Rights and Responsibilities Form, in violation of established Health Care protocols.**

**Clarvida is a "Large Nonprofit", making it subject to President Trump's Executive Order regarding DEI.**

**Clarvida received and continues to receive a significant amount of Federal funding.**

**Clarvida maintains, or permits a hostile environment against Christians.**

**A Clarvida employee was filmed a few days before Holy Week 2025 stating the Bible is the cause of slavery and violence against women and that because Jesus was "born a Jew", He would support that mindset.**

**Clarvida employees have aggressively prohibited Christians from quietly praying.**

**Clarvida employees have militantly enforced the mandatory use of 3rd parties preferred pronouns. This was done even when the 3rd party in question was not within earshot, and therefore could not have been offended.**

**Clarvida withholds ongoing services from Patients or Program Participants who complain.**

**Clarvida uses food to lure undernourished people into LGBTQ+ activities.**

**Clarvida engages in forced immersion or grooming behavior by promulgating LGBTQ+ activities to Patients, at least some of whom have severe and significant Cognitive delays.**

**Some of the Patients induced into participation of gay pride have drastically diminished mental capacity.**

**Some of the Patients have severe psychosis and are unable to make rational, informed decisions about their sexual choices.**

**Some Patients have objected to the pride activities being held all month long and were told to not come if they didn't like it.**

**Clarvida has not provided an alternative activity during the designated time frame of the Stonewall day celebration.**

**THEY DO NOT HAVE THE STAFF TO OFFER AN ALTERNATIVE ACTIVITY so requesting that is useless.**

**Clarvida canceled a Trauma Recovery group in order to celebrate Stonewall day. This occurred because the group facilitator, Freddy Fernandez is a homosexual and demanded the Stonewall day event take precedence over the Trauma Recovery group.**

**Trauma Recovery is for everyone, including those who live the homosexual, transsexual or nonbinary/ genderqueer lifestyle.**

**Clarvida's Wellness South Calendar shows another pride event on June 26th - the 10 year anniversary of Obergefell vs Hodges.**

**Clarvida staff picked those dates with surgical precision to align with historical events that celebrate days considered to be LGBT+ milestones or victories.**

**Clarvida staff will not allow Christians, or for that matter any other Abrahamaic religion to attend the Stonewall day celebration and quote the Judeo-Christian Bible, including verses in the Torah or the New Testament regarding homosexuality.**

**Clarvida staff will not allow anyone to state facts contrary to LGBT+ programming. For example, that there are only 2 genders, or articulate the belief that every member of Humanity was created male or female.**

**Clarvida staff will not allow anyone to offer their view that marriage is the Sacred union of one male and one female.**

**Clarvida staff will not allow anyone to articulate the viewpoint that gender is biological and immutable.**

**Clarvida will not permit anyone to mention programs like Courage which advocates for compassionate treatment and respect for the same-sex attracted, while guiding and encouraging them to choose celibacy.**

**Clarvida will not allow anyone to mention Reparative Therapy, but freely doles out information about how to obtain gender changing hormones and even surgery.**

**By imposing these speech restrictions, Clarvida is deliberately promoting one worldview or ideology over another.**

**At least a few Patients who identify as Atheist or non-Religious have complained the incessant gay centered activities were too much and promoted over regular activities.**

**Clarvida does not inform Patients of their Rights to make grievances directly to the County's Health Care Agency. (OCHCA)**



# Wellness Center Central

## June 2025

401 S. Tustin Street # C  
Orange, CA 92866  
Phone: (714)361-4860  
www.wellnesscenteroc.com

Hours of Operation  
Monday-Thursday & Saturday 9:00am-5:00pm  
Friday 9:00am-8:00pm

Calendar is subject to change. Translators available upon request.

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
<b>16 9:15-9:45</b> Ice Breaker LR <b>9:45-11:45</b> Campus Sports Activities featuring Volleyball OS <b>10:00-10:30</b> Walk & Talk OS <b>10:00-11:00</b> Mindful Meditation 111 Dual Recovery Anonymous 108 (H) 847 7808 6908 <b>10:00-12:00</b> Jewelry Design 113 <b>11:00-12:00</b> Break through the Barriers of Trauma 108 (H) 816 7681 1961 Music Appreciation 114 Yoga 107 <b>12:00-1:00</b> Social Time LR (H) 823 6633 6837 <b>1:00-2:00</b> Healthy Relationships 108 (H) 840 3417 3056 AA Open Meeting 107 Story Circle 114 <b>2:00-3:00</b> Healing With Art 113 <b>2:15-3:15</b> Coping Skills 108 Social Anxiety 111 <b>3:30-4:30</b> DBSA 108 Game Time 114	<b>17 9:15-9:45</b> Ice Breaker LR <b>9:45-10:45</b> Eat Well, Live Well 114 (H) 814 7469 2733 <b>10:00-11:00</b> AI-Anon Meeting 107 <b>10:00-11:30</b> Join Us For Coffee F <b>10:00-12:00</b> Watercolors 113 <b>10:00-1:00</b> Volunteerism F Gold Coast Farms <b>11:00-12:00</b> Schizophrenia Alliance 114 DBSA 111 Karaoke 108 <b>12:00-1:00</b> Social Time LR New Lung 114 (H) 852 9041 3250 <b>1:00-2:00</b> Self Empowerment 111 (H) 895 9260 2224 Time Travel with Terry 108 (H) 868 9159 0989 <b>1:00-2:00</b> *New Group* Work Order Day Orientation 114 <b>1:30-2:30</b> Beginning Computer 109 <b>2:00-3:00</b> *New Day & Time!!* That's My Line 111 <b>2:00-3:30</b> Mosaics 113 <b>2:15-3:15</b> Anger Management 108 (H) 897 1661 6727 <b>3:30-4:30</b> Chess Club 114 Relaciones Saludables 108	<b>18 9:15-9:45</b> Ice Breaker LR <b>9:45-10:45</b> Wellness Wednesday 114 Gardening OS NAMI Connection 108 (H) 824 5047 2205 <b>9:45-11:00</b> Art Workshop 113 Campus Sport Activities OS <b>10:00-10:30</b> Walk & Talk OS <b>10:00-11:00</b> AA Open Meeting 111 (H) 836 0460 9371 <b>11:00-11:50</b> Community Meeting LR (H) 844 3176 0396 <b>11:00-2:00</b> Volunteerism F Food Distribution <b>12:00-1:00</b> Social Time LR (H) 823 6633 6837 <b>1:00-2:00</b> ASL Sign Language 108 Spending Wisely 107 <b>1:00-2:30</b> Jewelry Design 113 WRAP 114 (H) 832 7126 3020 <b>1:30-3:00</b> Uke N'Feel Better 111 <b>2:30-3:30</b> Bingo 107 <b>2:30-4:00</b> Chess Club 114 Crochet 113 <b>3:30-4:30</b> Recovery Expression 107 Social Skills 108	<b>19 9:15-9:45</b> Ice Breaker LR <b>9:45-10:45</b> Tai Chi 107/OS <b>*New Group!!*</b> Creative Dance for Healing 111 <b>9:45-11:15</b> Campus Sport Activities OS <b>10:00-11:00</b> Healthy Living 114 (H) 812 0742 2407 DBSA 108 (H) 852 7154 9027 <b>10:00-2:00</b> Social Outing F The Broad <b>11:00-12:00</b> Open Discussion 107 Positive Thinking 108 (H) 841 4238 8927 <b>12:00-1:00</b> Social Time LR <b>12:00-3:00</b> Volunteerism F Beach Clean Up <b>1:00-2:00</b> Juicing K Employment/Education Support 114 Enlightenment 111 <b>1:00-2:30</b> Advanced Music Academy 108 (H) 885 0804 0727 <b>2:00-3:00</b> 111 Emotional Wellness <b>2:00-3:30</b> Game Time 107 <b>2:00-4:30</b> Open Art Class 113 <b>3:30-4:30</b> NA Open Meeting 111 (H) 836 0460 9371 Poetry 114 (H) 860 6045 5887	<b>20 9:15-9:45</b> Ice Breaker LR <b>10:00-11:00</b> Looking Good-Feeling Good 108 <b>10:00-11:30</b> Cooking K <b>10:00-11:30</b> Campus Sport Activities <b>11:00-12:00</b> *New Group* Work Order Day Orientation 108 <b>11:00-12:00</b> Stay Fit Friday 107/OS AA Open Meeting 111 <b>12:00-1:00</b> Social Time LR (H) 823 6633 6837 <div> <b>1:00-2:30</b> Pride Celebration                </div> <b>3:00-4:30</b> Good Vibes Circle 108 Chess Club 114 <b>3:15-4:15</b> Choir 107 (H) 857 3185 8460 <b>4:00-5:00</b> West African Drumming 111 <b>5:00-8:00</b> Social Hour LR 113, 108 Anime/Japanese Language 107	<b>21 9:15-9:45</b> Ice Breaker LR <b>9:45-10:45</b> Coping Skills 108 <b>10:00-12:00</b> Jewelry Design 113 <b>10:00-11:00</b> Schizophrenia Alliance 114 <div> <b>10:30-4:00</b> Social Outing F Wurst Fest at Old World in Huntington Beach                </div> <b>11:00-12:00</b> Enlightenment 108 (H) 867 7506 1248 <b>12:00-1:00</b> Topic of the Day 108 (H) 810 6071 6338 <b>12:00-1:30</b> *New Game!!* "Golf" Card Game 107 <b>**Special Group**</b> <b>12:30-1:50</b> Art Calendar Workshop 113 <b>1:00-2:00</b> Poetry 114 NAMI Connection 108 (H) 825 2384 8811 <b>2:15-4:25</b> Art Workshop 113 In House Cinema LR Bingo 114 Karaoke 108 Fun with Games 107 <p>Copyright Clarvida, 2025, All Rights Reserved</p>
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