

1 **KRONENBERGER ROSENFELD, LLP**  
2 Karl S. Kronenberger (CA Bar No. 226112)  
3 Jeffrey M. Rosenfeld (CA Bar No. 222187)  
4 Leah Rosa Vulić (CA Bar No. 343520)  
5 150 Post Street, Suite 520  
6 San Francisco, CA 94108  
7 Telephone: (415) 955-1155  
8 Facsimile: (415) 955-1158  
9 karl@kr.law  
10 jeff@kr.law  
11 leah@kr.law

12 Attorneys for Plaintiff King Vanga

13 **SUPERIOR COURT OF CALIFORNIA**  
14 **COUNTY OF SAN FRANCISCO**  
15 **UNLIMITED CIVIL**

16 **KING VANGA**, an individual,

17 Plaintiff,

18 v.

19 **RENÉE PENA**, an individual,  
20 **KATHLEEN A. JUAREZ**, an individual,  
21 **PRISCILLA N. JUAREZ**, an individual,  
22 **ANTHONY JOSEPH HIDALGO**, an  
23 individual, and  
24 **JOHN DOES 6–10**, unknown individuals,

25 Defendants.

Case No. CGC-23-606993

**FIRST AMENDED COMPLAINT**

**EXCEEDS \$25,000**

**DEMAND FOR JURY TRIAL**

ELECTRONICALLY

**FILED**

*Superior Court of California,  
County of San Francisco*

**09/15/2023**

**Clerk of the Court**

BY: SANDRA SCHIRO

Deputy Clerk

1 Plaintiff King Vanga, by and through his undersigned counsel, pursuant to Code of  
2 Civil Procedure section 474, hereby substitutes the following Defendants for John Does 1  
3 through 5 and alleges as follows:

- 4 • Plaintiff hereby substitutes Defendant Renée Pena for anonymous Defendant  
5 John Doe 1;
- 6 • Plaintiff hereby substitutes Defendant Kathleen A. Juarez for anonymous  
7 Defendants John Does 2–3;
- 8 • Plaintiff hereby substitutes Defendant Priscilla N. Juarez for anonymous  
9 Defendant John Doe 4; and
- 10 • Plaintiff hereby substitutes Defendant Anthony Joseph Hidalgo for anonymous  
11 Defendant John Doe 5.

## 12 INTRODUCTION

13 1. Plaintiff King Vanga is a student at Stanford University and an upstanding  
14 member of the community.

15 2. On June 25, 2021, Plaintiff was involved in a tragic car accident, which  
16 resulted in the deaths of two individuals, and which injured Plaintiff.

17 3. While authorities initially accused Plaintiff of driving under the influence, a  
18 toxicology report disproved these accusations.

19 4. Between June 29, 2021 and July 16, 2021, Defendants, and unknown  
20 individuals, designated in this Complaint as John Does 6–10, sent emails and/or letters  
21 to Stanford University, and/or conspired to send emails and/or letters, containing false  
22 and disparaging statements about Plaintiff and requesting that Stanford expel Plaintiff  
23 (the “Letter(s)”).

24 5. Plaintiff first learned about the Letters on October 6, 2022, when Stanford  
25 disclosed them to Plaintiff pursuant to a request made under the Family Education Rights  
26 and Privacy Act, 20 U.S.C. §1232g (“FERPA”).

27 6. The Letters contain false assertions of fact, including statements that  
28 Plaintiff was under the influence at the time of the accident, that Plaintiff had previously

1 been charged for other DUI-related offenses, that Plaintiff was a felon, that Plaintiff tried  
2 to flee the scene, and that Plaintiff murdered two individuals.

3 7. Contrary to the statements in the Letters, Plaintiff did not murder anyone,  
4 Plaintiff was not driving under the influence at the time of the accident, Plaintiff did not  
5 have prior arrests or convictions for driving under the influence, Plaintiff did not attempt to  
6 flee the scene of the accident, Plaintiff is not a felon, and Plaintiff did not violate Stanford  
7 University's code of conduct.

8 8. Defendants acted negligently in evaluating the truth or falsity of the  
9 statements in their Letters and in sending the Letters to Stanford, given that Defendants  
10 harbored anger and hostility toward Plaintiff, given that they relied on sources known to  
11 be biased against Plaintiff, and given that they failed to investigate the facts.

12 9. Moreover, because the Letters contain both true statements (*i.e.*,  
13 statements that a vehicular accident occurred and that, as a result, two individuals lost  
14 their lives), along with the false statements of fact, the Letters give an air of credibility to  
15 the false statements.

16 10. As a result of Defendants' publication of the Letters, Plaintiff has been  
17 damaged, including harm to his reputation, grief, anxiety, humiliation, and emotional  
18 distress.

### 19 **JURISDICTION AND VENUE**

20 11. This Court has jurisdiction over this matter under the California Constitution,  
21 Article VI §10. Plaintiff seeks damages in excess of the jurisdictional minimum of the  
22 unlimited jurisdiction of the Superior Court.

23 12. This Court has personal jurisdiction over Defendants Renée Pena,  
24 Kathleen A. Juarez, Priscilla N. Juarez, and Anthony Joseph Hidalgo (collectively,  
25 "Named Defendants") because, on information and belief, Named Defendants reside in  
26 California.

27 13. The Court has personal jurisdiction over Defendants John Does 6–10  
28 because, on information and belief, Defendants John Does 6–10 are residents of

1 California and were located in California when they published, or assisted in publishing,  
2 the statements at issue. Moreover, Defendants purposefully directed their misconduct  
3 towards California and targeted a California audience, namely Stanford University,  
4 knowing that Plaintiff resides in California and that the brunt of the harm would be  
5 suffered in California.

6 14. Venue is proper pursuant to Code of Civil Procedure section 395 because,  
7 on information and belief, Defendant Anthony Joseph Hidalgo resides in San Francisco  
8 County.

9 **PARTIES**

10 15. Plaintiff King Vanga is an individual residing in California.

11 16. On information and belief, Defendant Renée Pena is an individual residing  
12 in Atwater, California.

13 17. On information and belief, Defendant Kathleen A. Juarez is an individual  
14 residing in Ontario, California.

15 18. On information and belief, Defendant Priscilla N. Juarez is an individual  
16 residing in Riverside, California.

17 19. On information and belief, Defendant Anthony Joseph Hidalgo is an  
18 individual residing in San Francisco, California.

19 20. Plaintiff does not know the true names or capacities, whether individual,  
20 associate, corporate, or otherwise, of Defendants John Does 6–10. Plaintiff therefore  
21 sues the John Doe Defendants pursuant to Code of Civil Procedure section 474. Plaintiff  
22 will amend this Complaint to state the true name(s) and capacity(ies) of the John Does  
23 6–10 once this information is discovered. Plaintiff is informed and believes, and upon that  
24 basis alleges, that the John Doe Defendants are in some way and to some degree liable  
25 and responsible to Plaintiff on the facts alleged.

26 **FACTS**

27 21. Plaintiff King Vanga is a student at Stanford University and an upstanding  
28 member of the community.

1           22. Plaintiff recently completed his bachelor's degree in computer science and  
2 is currently finishing his coterminal master's degree in management science and  
3 engineering, both at Stanford University.

4           23. On June 25, 2021, Plaintiff was involved in a fatal car accident (the  
5 "Accident"), which resulted in the deaths of two individuals and injured Plaintiff.

6           24. Plaintiff did not cause the Accident intentionally, and he was not acting  
7 negligently when the Accident occurred.

8           25. Plaintiff was not under the influence of alcohol or other prohibited  
9 substances at the time of the Accident.

10          26. Plaintiff was arrested by police following the Accident, during which time  
11 police officers assaulted Plaintiff (even though Plaintiff was already visibly injured and  
12 disoriented as a result of the Accident).

13          27. On or around June 30, 2021, Plaintiff was charged with multiple crimes,  
14 including gross vehicular manslaughter while intoxicated.

15          28. Plaintiff has consistently denied the charges and submitted arguments to  
16 the court, in the court's public record, that he was not driving under the influence when  
17 he was involved in the Accident.

18          29. In March 2023, the district attorney dropped the charges against Plaintiff  
19 related to driving under the influence after a toxicology report showed that Plaintiff had no  
20 alcohol or other prohibited substance in his system at the time of the Accident.

21          30. Other than the unsubstantiated claims in the police report and the State's  
22 court filings, no evidence has existed that Plaintiff drove under the influence or engaged  
23 in any other unlawful conduct related to the Accident.

24          31. Plaintiff has never been convicted of a crime, and other than the arrest and  
25 charges related to the Accident, Plaintiff has never been arrested or charged with a  
26 crime.

27          32. On September 26, 2022, Plaintiff sought to gain access to his student file at  
28 Stanford University through the procedures outlined in FERPA.





- 1 • Plaintiff engaged in “criminal act[s].” [Letter No. 1 by Renée Pena];
- 2 • Plaintiff is a “felon.” [Letter No. 1 by Renée Pena];
- 3 • Plaintiff “refus[ed] to submit to a breath test.” [Letter No. 2 by Kathleen A.
- 4 Juarez];
- 5 • The author of a Letter “presume[d]” that Plaintiff “blatantly violated
- 6 [Stanford’s] code of conduct.” [Letter No. 2 by Kathleen A. Juarez];
- 7 • “King (Vivek) Vanga at the age of 20 years old, drove while intoxicated
- 8 (currently believed to have been under the influence of both alcohol and drugs) at a high
- 9 rate of speed, and murdered [REDACTED], Pamela and Jose Juarez, in Atwater,
- 10 California.” [Letter No. 3 by Kathleen A. Juarez];
- 11 • “It is my information and belief that this is not King (Vivek) Vanga’s first
- 12 charge of driving under the influence.” [Letter No. 3 by Kathleen A. Juarez];
- 13 • Plaintiff “has violated and tainted Stanford’s Code of Conduct values, to the
- 14 most extreme measure.” [Letter No. 4 by Priscilla N. Juarez];
- 15 • “After murdering [REDACTED] it is my understanding, that Vanga, (20) had
- 16 tried to flee the scene after slamming into [REDACTED] sending their car 40 feet from
- 17 the collision point.” [Letter No. 4 by Priscilla N. Juarez];
- 18 • “I do believe that all who commit such a crime should in fact and must be
- 19 held responsible for their irresponsible actions and behaviors. In this case those
- 20 behaviors led to the murder of [REDACTED] Jose and Pam Juarez.” [Letter No. 4 by
- 21 Priscilla N. Juarez];
- 22 • “On June 25th, 2021, Stanford student, King (Vivek) Vanga at the age of 20
- 23 years old, drove while intoxicated at a high rate of speed, and murdered [REDACTED],
- 24 Pamela and Jose Juarez, in Atwater, California.” [Letter No. 5 by Anthony Joseph
- 25 Hidalgo];
- 26 • “After murdering my grandparents in the collision . . .” [Letter No. 5 by
- 27 Anthony Joseph Hidalgo]
- 28 • “Our information has led us to believe that this is not King (Vivek) Vanga’s

1 first charge of driving under the influence.” [Letter No. 5 by Anthony Joseph Hidalgo];  
2 (collectively, the “Statements”).

3 42. The Statements are false assertions of fact, even when couched as  
4 opinions.

5 43. To the extent the Statements are based on facts from third-party sources,  
6 those facts are incorrect, incomplete, and erroneous.

7 44. Contrary to the Statements, Plaintiff has not murdered anyone.

8 45. Contrary to the Statements, Plaintiff was not out drinking, and was not  
9 intoxicated or under the influence of any prohibited substance, at the time of the  
10 Accident.

11 46. Contrary to the Statements, prior to the Accident, Plaintiff had never been  
12 accused, charged, or convicted of any DUI-related offenses (or any crime).

13 47. Contrary to the Statements, Plaintiff did not attempt to flee the scene of the  
14 Accident.

15 48. Contrary to the Statements, Plaintiff did not refuse to submit to a breath  
16 test.

17 49. Contrary to the Statements, Plaintiff did not engage in criminal acts.

18 50. Contrary to the Statements, Plaintiff is not a felon.

19 51. Contrary to the Statements, Plaintiff did not feign suicidal ideation.

20 52. Contrary to the Statements, Plaintiff has not violated Stanford’s Code of  
21 Conduct.

22 53. During all relevant times, Plaintiff was a private figure who had not achieved  
23 pervasive fame or notoriety.

24 54. During all relevant times, Plaintiff had not voluntarily injected himself into a  
25 controversy regarding the Accident for the purpose of influencing the controversy's  
26 ultimate resolution.

27 55. On information and belief, other than unsubstantiated police reports and the  
28 State’s unsubstantiated criminal allegations, and news reports summarizing the same,





1 Defendants did not possess any evidence supporting the Statements.

2 56. On information and belief, Defendants were aware that their Statements in  
3 the Letters were based on unsubstantiated police reports and unsubstantiated criminal  
4 allegations.

5 57. On information and belief, Defendants understood that authorities were  
6 continuing to investigate the Accident and that the truth of the charges against Plaintiff  
7 would depend on the results of that investigation.

8 58. It was unreasonable for Defendants to publish the Statements in the Letters  
9 based on the information they had at the time. In other words, a reasonable person in  
10 Defendants' positions would not have believed that the Statements in the Letters were  
11 truthful and verified assertions of fact as opposed to unproven allegations.

12 59. Defendants' unreasonableness is reflected by the fact that, as reported by  
13 the New York Times and other reputable news agencies, a majority of Americans do not  
14 trust law enforcement, which, on information and belief, was Defendants' sole source of  
15 information supporting the Statements.

16 60. Thus, Defendants failed to use reasonable care to determine the truth or  
17 falsity of the Statements.

18 61. On information and belief, Defendants and Stanford had no relationship  
19 with each other before Defendants sent the Letters, such as a contractual, business, or  
20 similar relationship. As such, Defendants did not stand in any relationship with Stanford  
21 that would have created a reasonable basis for believing the motive for the  
22 communication to be innocent and to further Defendants' and Stanford's shared interest.

23 62. The Letters and Statements were viewed by at least Stanford University  
24 and employees of Stanford University, if not others.

25 63. As a result of Defendants' publication of the Statements, Plaintiff has  
26 suffered damages, including harm to his reputation, grief, anxiety, humiliation, and  
27 emotional distress.

28 //

**FIRST CLAIM FOR RELIEF**  
**(Defamation)**

64. Plaintiff repeats and incorporates by reference the allegations contained in the preceding paragraphs.

65. Named Defendants published the Letters containing the false and disparaging Statements about Plaintiff.

66. On information and belief, all Defendants conspired with and aided and abetted each other in publishing the Letters containing the false and disparaging Statements.

67. Defendants failed to use reasonable care to determine the truth or falsity of the Statements in the Letters, including because they harbored anger and hostility toward Plaintiff, because they relied on unsubstantiated and distrusted sources known to be biased against Plaintiff, and because they failed to investigate the facts. A reasonable person in Defendants' position would have had doubts about the accuracy of the Statements based on the information that Defendants relied on to publish the Statements.

68. Viewers of the Letters reasonably understood the Statements about Plaintiff to be true.

69. The Statements are false and disparaging assertions of fact.

70. The Statements are defamatory per se because they contain charges in the language itself that the recipients/viewers would understand as defamatory without the need for extrinsic explanatory matter, including the false Statements that Plaintiff engaged in criminal conduct.

71. As a result of Defendants' Statements, Plaintiff was harmed, including harm to his reputation, grief, anxiety, humiliation, and emotional distress.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff King Vanga respectfully requests that the Court enter judgment in his favor and against Defendants Renée Pena, Kathleen A. Juarez, Priscilla

1 N. Juarez, Anthony Joseph Hidalgo, and John Does 6–10, and award the following relief  
2 to Plaintiff and against Defendants:

- 3 1. Compensatory damages in an amount to be proved at trial.
- 4 2. The costs of the suit.
- 5 3. Such other relief as the Court may deem proper.

6  
7 Respectfully Submitted,

8 DATED: September 15, 2023

**KRONENBERGER ROSENFELD, LLP**

9  
10 By:   
11 Leah Rosa Vulić

12 Attorneys for Plaintiff King Vanga  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **REQUEST FOR JURY TRIAL**

2 Plaintiff King Vanga hereby demands a trial of this action by jury of all issues that  
3 may be tried to the jury.

4  
5 Respectfully Submitted,

6 DATED: September 15, 2023

**KRONENBERGER ROSENFELD, LLP**

7  
8 By:   
9 Leah Rosa Vulić

10 Attorneys for Plaintiff King Vanga

# Exhibit A

**From:** [Renee Pena](#)  
**To:** [Office of the President](#)  
**Subject:** Current Student  
**Date:** Friday, July 16, 2021 10:13:26 AM

---

Hello,

To introduce myself, my name is Renee Pena. I am writing this letter as a community member that has been a victim of a crime that took the life of my husband. I know the pain of grief that I will have to live with for the rest of my life. It's a burden that no one should have to endure.

Recently, my town suffered another loss in a fiery traffic collision caused by one of your current students, King Vanga. I watched the live broadcast this morning while waiting for my students to begin their school day. I watched a murderer plead not guilty. I watched a murderer walk from the public seating in the courtroom to sit beside his attorney. I watched a free man. A free man that should not be free. I listened to the judge question how this man with multiple felony charges against him could be without ankle monitoring. I listened to the judge for him to be monitored and I listened to the defense attorney request for exceptions for school since he's a "college student."

Was he concerned about his college courses while he was out drinking? Was he concerned about his status at Stanford when he chose to get behind the wheel? Was he considering the risks he was taking? He killed two, not one, but TWO innocent people. He chose to resist arrest and attack officers. He chose to play suicidal and act the part to get bail, get "therapy" which netted him freedom.

As an educated individual, I remain dumbfounded by the lack of justice in our system when it comes to DUI offenders. I remain absolutely dumbfounded as to how any criminal act that results in the death of an innocent victim be categorized as nonviolent.

Please consider the charges your student, King Vanga, has pending and whether your institution should desire to have a connection to a felon.

Thank you,

Renée Pena, M. A., Ed.

# Exhibit B

**From:** [Stacey Marie Faraci](mailto:Stacey Marie Faraci)  
**To:** [Stacey Marie Faraci](mailto:Stacey Marie Faraci)  
**Subject:** FW: Your student: King Vanga  
**Date:** Tuesday, October 4, 2022 3:05:37 PM  
**Attachments:** [21CR-02699 - Complaint.pdf](#)

---

**From:** Kathleen Castro <[kathleenalexys@gmail.com](mailto:kathleenalexys@gmail.com)>  
**Date:** Monday, July 26, 2021 at 10:15 PM  
**To:** deanofstudents <[deanofstudents@stanford.edu](mailto:deanofstudents@stanford.edu)>  
**Subject:** Your student: King Vanga

Good Evening Dean of Students,

I am writing this email on behalf of the Juarez family. One month ago, we received the worst news of our lives. We were informed that our loved ones, my husband's parents, Pamela and Jose Juarez, had both been killed in a collision after your student King (Vivek) Vanga crashed into their vehicle at a high rate of speed causing their vehicle to instantly become engulfed in flames as it propelled to the opposite side of the roadway. Our information from the CHP at the accident scene was that upon contact with your student, King Vanga, the officers smelled an odor of alcohol on his person.

We are informed that after refusing to submit to a breath test, the officer attempted to place your student, King Vanga under arrest, at which time he became combative with the officers while resisting arrest. This information is further supported by the charges included in the attached Criminal Complaint filed by the State of California against your student, King Vivek Vanga, which include two counts of felony gross vehicular manslaughter while intoxicated, felony resisting executive officer (resisting arrest), felony attempted firearm removal (after attempting to take an officer's firearm in the course of the arrest), and misdemeanor battery on a peace officer (after using force against the officer attempting to effectuate the arrest).

At the July 16th arraignment, the Judge Ordered your student King (Vivek) Vanga to wear an ankle monitor while out of custody after having paid the \$415,000.00 bail. However, the attorney for your student King (Vivek) Vanga requested for the Court to grant an exemption for attending school, which would be your school, Stanford University. It troubles us to think that such a prestigious university such as Stanford would allow a student, whom we presume has blatantly violated your University's code of conduct, to return after engaging in the conduct detailed in the attached Criminal Complaint. It is our opinion that such a student is a stain on Stanford's reputation and should no longer be permitted to be a representative of your University, as each of your students are direct reflections of Stanford's values.

We have included various links to articles by Merced Daily, Merced Sun Star, and various other online periodicals, detailing the incident as well as including the story of Pamela and Jose Juarez... mother and father to six children, grandparents to fifteen (15) grandchildren, with two additional grandchildren arriving in October of 2021 and January of 2022. We have also included the link to the ABC 30 news coverage of this incident and the impact on us all as the family. On Tuesday, July 20th,



we laid Pamela and Jose Juarez to rest in Norco, California. It is estimated that over 350 people were in attendance at their services. So many family members and friends are left mourning the loss of two of the most loving and selfless individuals to grace this earth.

While we are hopeful that justice will be served in relation to the Criminal Proceeding, we hope that Stanford will uphold the code of conduct, specifically wherein your website details, "Students at Stanford are expected to show both within and without the University such respect for order, morality, personal honor and the rights of others as is demanded of good citizens." We believe that the circumstances detailed herein and in the attached Criminal Complaint are sufficient to warrant expulsion from your prestigious university. At a minimum, we presume that Stanford would want to protect your community of students from an individual charged with the felony and misdemeanor counts included in the Complaint, as some of these charges include violent offenses using force.

Should you have any questions or require clarification, please feel free to contact us at your earliest convenience. We appreciate your time and attention to this important matter.

Thank you,

Kathleen Juarez (on behalf of the Juarez family).

**Links to Articles:**

<https://abc30.com/merced-county-crash-car-fatal-parents-killed/10873202/>

<https://www.mercedsunstar.com/news/local/article252639643.html>

<https://merceddaily.com/featured/family-friends-want-justice-for-married-couple-killed-in-alleged-duit-crash/>

<https://www.mercedsunstar.com/news/local/crime/article252518928.html>

<https://www.thegwnews.com/Merced/king-vivek-vanga-charged-in-killing-of-pam-and-jo-juarez/>

<https://merceddaily.com/crime/merced-countys-duit-mugshots-69/>

# Exhibit C

Stanford University  
450 Jane Stanford Way  
Stanford, CA 94305-2004

June 29, 2021

Re: Your student King (Vivek) Vanga

To Whom it May Concern,

It is my understanding that King (Vivek) Vanga is currently a student of your university in the Computer Science program, scheduled to graduate in 2023. From a brief overview of your university's website, it is my understanding that Stanford stands for excellence with a strong foundation in ethics. For this reason, I believe it is crucial to inform your university that your current student King (Vivek) Vanga does not encompass Stanford's values and is a stain on your university's reputation.

On June 25, 2021, your student, King (Vivek) Vanga at the age of 20 years old, drove while intoxicated (currently believed to have been under the influence of both alcohol and drugs) at a high rate of speed, and murdered my in laws, Pamela and Jose Juarez, in Atwater, California.

After murdering my in laws, it is my understanding from both the news articles as well as his booking information that he attempted to flee the scene, resisted arrest, battered/assaulted police officers, and attempted to grab a police officer's firearm. It is my information and belief that this is not King (Vivek) Vanga's first charge of driving under the influence.

Just so that you have a bit of background on my in laws Pamela and Jose Juarez, they were the most loving and genuine human beings that I have been fortunate enough to encounter in my life. They were married for 38 years, had six children, three daughter in laws, two son in laws, fifteen grandchildren, and two grandchildren on the way (due in October and January). There was not a soul in this world that would have one negative thing to say about Pamela or Jose Juarez. They were an inspiration to all, always embarking on adventures with their friends and families.

Pamela worked for the school district for over 20 years in different capacities, recently retiring from her position working with special needs students, to spend more time with her grandchildren. Jose was the epitome of a hard-working man, doing everything possible to provide the best life for his family.

Due to your student King (Vivek) Vanga's actions, my family has lost the two most important people in our lives. We have been robbed of the many years of memories that we would have shared together. Because of King (Vivek) Vanga, my child will never meet their

grandparents or share in their love. My life will never be the same. I am broken, we are all broken. The outpour of love and support for Pamela and Jose Juarez is a testament to the wonderful people they were. Hundreds of lives are forever changed because of the actions of King (Vivek) Vanga.

I know that I cannot control what action is taken by Stanford with respect to King (Vivek) Vanga, but I hope this letter has shed light to your institution of the poor moral character of your student, who by association with your university, is a direct reflection of Stanford. It is my belief that this student does not possess the caliber of character that is required to represent your institution.

In the event that your school does in fact value ethics and responsibility, I strongly urge you to reconsider the status of this student King (Vivek) Vanga. While we hope that he is held accountable for his actions through the justice system for the countless charges that are included in his arrest record for this incident, I truly hope that your institution holds him accountable as well. When I attended Chapman University in Orange County, we were constantly reminded that as reflections of the institution, we were expected to exhibit high moral character and fitness, and were told that we would be held accountable for our actions both on and off campus as representatives of the University. I hope that Stanford has similar values and accountability requirements for your students.

Thank you for your time and attention. If there is any additional information that I can provide, please advise.

Sincerely,

Kathleen A. Juarez  
(714) 980-0549  
Kathleenalexys@gmail.com

Kathleen A. Juarez  
3200 Inland Empire Blvd #265  
Ontario, CA 91764

SANTA ANA CA 926  
1 JUL 2021 PM 6 1

\$0.510  
US POSTAGE  
FIRST-CLASS  
FROM 91764  
JUN 30 2021  
stamps  
endicia



Stanford University  
450 Jane Stanford Way  
Stanford CA 94305-2004

**RECEIVED**  
JUL 07 2021  
OFFICE OF THE  
GENERAL COUNSEL

94305-200845



# Exhibit D

**From:** [Stacey Marie Faraci](#)  
**To:** [Stacey Marie Faraci](#)  
**Subject:** RE: Urgent matter\_student\_King Vanga  
**Date:** Tuesday, October 4, 2022 2:08:44 PM

---

**From:** Priscilla JUAREZ <[pnj0710@yahoo.com](mailto:pnj0710@yahoo.com)>

**Sent:** Friday, July 2, 2021 8:25:50 PM

**To:** [admission@stanford.edu](mailto:admission@stanford.edu)

Stanford University  
450 Jane Stanford Way Stanford, CA 94305-2004  
June 30th 2021

Re: Your student King (Vivek) Vanga

To whom it may concern,

I am writing this letter to you because it has been brought to my attention that one of your students, King (Vivek) Vanga, whom is currently in your Computer Science Program projected to graduate 2023, has violated and tainted Stanfords Code of Conduct values, to the most extreme measure. As stated in Stanford University's Code of Conduct policies, "All members of the University Community are responsible for sustaining the high ethical standards of this institution, and the broader community in which we function." Stanford University's code also states that, "This code is a shared statement of our commitment to upholding the ethical, professional and the legal standards we use and the basis for our daily and long term decisions and actions." You state that all members of this community MUST comply with these policies, standards, laws and regulation. On the night of June 25th, 2021 at approximately 9:40 pm King (Vivek) Vanga was arrested and detained in Atwater, Ca on multiple charges. One of which was murdering my beloved in-laws. Jose and Pamela Juarez. Both only 56 years old. Police reports claim that Vanga, 20 years old was driving at an extremely accelerated speed on Santa Fe ave in Atwater California all while intoxicated most likely by both alcohol and drugs. Not only was he completely irresponsible but also underage. My husband, myself and his family are completely broken and devastated. This does not even begin to explain the pain we feel.

After murdering both of my in-laws it is my understanding, and knowledge that Vanga, (20) had tried to flee the scene after slamming into my in-laws sending their car 40+ feet from the collision point. After police arrived and tried detaining Vanga, he then tried to grab the officers weapon and obstructed the officers attempt to arrest him. There are witness to attest to these behaviors committed by Vanga, and police reports that confirm his actions.

I wanted to share with you a little bit about who my in-laws were and just how important they were to my husband, myself and all who knew them. They were only 56 years old and they leave being 6 of their children; Jose III, Sergio (my husband), Angelica, Christina, Javier and their youngest Gabriella. They also leave behind their 15 grandchildren with an additional two on the way, whom will never get the opportunity to meet them nor build a relationship with them. Both Pam and Joe loved the outdoors and adventuring in their RV they had just purchased 2 moths Prior to their sudden death. Pam had just recently retired from working within the education system for over 20 yrs. She retired a bit early to help babysit for both of her daughters. She enjoyed being around her grandchildren is was more of as honor and privilege to provide that help for her daughters. Joe was always a hard worker who constantly provided for his family. Joe was a man of integrity, strength, and was admired by all who knew him and worked with him. He was always gave freely of himself to his kids and grandkids making all who knew him feel welcomed and loved. Pam and Joe were incredibly loved and admired by all of their children and there are honestly no words to describe the heartache we all are feeling.

Due to the poor judgement, behaviors and actions of your student, King (Vivek) Vanga, to say we are devastated broken would be an understatement. Vanga (20) has stolen from us so many more memories we had hoped to make with my in-law Joe & Pam. My 4 children will

who are still so young will no longer be able to build memories but only hold tight the short time they had with them.

I understand that it is not my place to take action or allocate his

consequences within the judicial system nor with Stanford, however, I do believe that all who commit such a crime should in fact and must be held responsible for their irresponsible actions and behaviors. In this case those behaviors led to the murder of my two amazing in-laws Joe and Pam Juarez. I truly believe that King (Vivek) Vanga is Not the kind of person you want representing your institution nor your community in which you hold in such high regards. I would hope that Stanford would take proper action in dismissing this man as an active student of your morally prestigious institution.

Thank your for your time and attention to this urgent matter. If any further action or requests are needed please do not hesitate to reach out.

Sincerely,

Priscilla N. Juarez (951) 415-4900 [pnj0710@yahoo.com](mailto:pnj0710@yahoo.com)

Sent from my iPhone

|



# Exhibit E

**From:** [Anthony Hidalgo](#)  
**To:** [Office of the President](#)  
**Subject:** Stanford Student DUI killed my Grandparents  
**Date:** Wednesday, July 7, 2021 8:43:41 PM

---

Stanford University  
450 Jane Stanford Way  
Stanford, CA 94305-2004

July 7th, 2021

Re: Your student King (Vivek) Vanga

To Whom it May Concern,

It is my understanding that King (Vivek) Vanga is currently a student of your university in the Computer Science program, scheduled to graduate in 2023. To my knowledge, Stanford is a world-renowned institution which holds its community to a very high standard. For this reason, I believe it is crucial to inform your university that your current student King (Vivek) Vanga does not embody Stanford's values and is truly a stain on the reputation of the University, staff, faculty and the student body.

On June 25, 2021, Stanford student, King (Vivek) Vanga at the age of 20 years old, drove while intoxicated at a high rate of speed, and murdered my grandparents, Pamela and Jose Juarez, in Atwater, California.

After murdering my grandparents in the collision, it is my understanding from both the news articles as well as his booking information that he attempted to flee the scene, resisted arrest, battered/assaulted police officers, and attempted to grab a police officer's firearm. Our information has led us to believe that this is not King (Vivek) Vanga's first charge of driving under the influence.

So that you have a better understanding of the type of people Pam and Joe were, I'd like to share the following. When my mom married my step-dad 6 years ago after adding 2 more children to our family (4 total) and 7 years of dating, I was so excited as I knew that meant Pam and Joe were my grandparents forever. When I told Grandpa Joe, he smiled and laughed, saying "Fool, I already am your grandpa". That's just who Pam and Joe were. It didn't matter that I wasn't "blood", I was their oldest grandkid. The love they showed me, my brother and my mom was one none of us had experienced before. It was truly unconditional love and support. The bond those two shared was one I'd never seen before. After being married for 38 years, you still couldn't find one without the other. They leave behind six children, three daughter in laws, two son in laws, fifteen grandchildren, and two grandchildren on the way whom have all had their relationships with Pam Joe cut short way to early.

Pamela worked at schools for over 20 years in different capacities, recently retiring from her position working with special needs students, to spend more time with her grandchildren. Joe was the rock of our family, always doing everything possible to provide the best life for his kids and grandkids.

Due to your student King (Vivek) Vanga's inexcusable actions, my family has lost the two most important people in our lives. We have been robbed of the many years of memories that we would have shared together. Because of King (Vivek) Vanga, my life, our lives, of all changed forever. The outpour of love and support for Pamela and Jose is testimony to the wonderful people they were. Hundreds of lives are forever changed because of the actions of King (Vivek) Vanga.

I know that I cannot decide what action is taken by Stanford with respect to King (Vivek) Vanga, but I hope this letter has shed light to your institution of the poor moral character of your student. By association with your university, Mr. Vanga is a direct reflection of Stanford. It is my belief that this student does not possess the caliber of character that is required to represent your institution.

In the event that your school does in fact value ethics and responsibility, I strongly urge you to reconsider the status of this student King (Vivek) Vanga. While we hope that he is held accountable for his actions through the justice system for the countless charges that are included in his arrest record for this incident, I truly hope that your institution holds him accountable as well.

When I applied to Stanford Law, I knew I was applying to a university that considers itself one of the best in the world. I knew that meant if I was a student at Stanford, I would be a direct representation of the institution, its staff and faculty as well as the other students. I knew Stanford would expect its students to not only be the best and brightest academically, but also as people. I whole heartedly believe that if my thoughts on Stanford are correct, Mr. Vanga will be expelled from the institution immediately. During my time as a student-athlete at La Salle University, we were taught to take responsibility for our actions, as well as for those who are a direct representation of ourselves, our school and our families. I hope this value stands true at Stanford too.

Thank you for your time and attention. If there is any additional information that I can provide, please do not hesitate.

Sincerely,

Anthony Joseph Hidalgo  
951-206-4812  
Anthonyhidalgo12@gmail.com