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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
6/23/2026 8:49 AM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By A. Llamas, Deputy Clerk

7 Attorneys for Plaintiff  
8 Julee Gianoulis

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF LOS ANGELES**

12 JULEE GIANOULIS, individually and in her  
13 capacity as administrator of the estate of  
Alexander DeCarli,

14 Plaintiff,

15 v.

16 RISE IN GLENDALE SOBRIETY  
17 CENTER, INC., a California corporation;  
ROBERT AKOPYAN, an individual, GARY  
18 DABBAH, an individual, MALINEH  
VARTANIAN, an individual; VAZGEN  
19 VARTANIAN, an individual, and DOES 1  
20 through 10, inclusive,

21 Defendants.

Case No. **26NNCV04928**

**JULEE GIANOULIS' COMPLAINT FOR:**

- 11 (1) **WRONGFUL DEATH SOUNDING IN NEGLIGENCE**
- 12 (2) **NEGLIGENT UNDERTAKING**
- 13 (3) **NEGLIGENT HIRING, RETENTION, AND SUPERVISION**
- 14 (4) **VIOLATION OF THE ELDER ABUSE AND DEPENDENT ADULT CIVIL PROTECTIVE ACT**
- 15 (5) **SURVIVORSHIP**
- 16 (6) **PREMISES LIABILITY**
- 17 (7) **VIOLATIONS OF THE UNFAIR COMPETITION LAW**
- 18 (8) **VIOLATIONS OF THE FALSE ADVERTISING LAW**

**JURY TRIAL DEMANDED**

1 Plaintiff Julee Gianoulis, individually and in her capacity as administrator of the estate of  
2 Alexander DeCarli (“Plaintiff”), brings this action against defendant Rise in Glendale Sobriety  
3 Center, Inc. (“Rise in Glendale”), Robert Akopyan, Gary Dabbah, Malineh Vartanian, Vazgen  
4 Vartanian, and Does 1 through 10, inclusive (collectively, “Defendants”) and allege as follows.

### 5 INTRODUCTION

6 1. Rise in Glendale markets itself as providing “24/7 medical supervision” so clients  
7 can detox safely and comfortably. Alexander DeCarli trusted those promises—and paid \$8,500 per  
8 day for them—when he bravely admitted himself to Rise in Glendale for inpatient alcohol detox on  
9 September 8, 2024.

10 2. Instead of receiving the medically appropriate screening, monitoring, and escalation  
11 required for a high-risk detox patient presenting with severe withdrawal symptoms and  
12 hypertension, Alex was left without meaningful clinical evaluation or vital-sign monitoring, in a  
13 facility unprepared even with basic emergency equipment. By morning, Alex was unresponsive.  
14 Staff attempted CPR, but no defibrillator could be located, and Alex was pronounced dead at 8:41  
15 a.m.

16 3. This action seeks to hold Rise in Glendale and its owners and operators accountable  
17 for a profit-driven “detox” operation that ignored foreseeable cardiac risk, downplayed symptoms  
18 to avoid hospital referral, violated governing standards, and caused a preventable death.

### 19 PARTIES

20 4. Decedent Alexander DeCarli (“Decedent”) was, at all times relevant to this  
21 complaint, an individual residing in Los Angeles County, California.

22 5. Plaintiff Julee Gianoulis (“Ms. Gianoulis”) is, and at all times relevant to this  
23 complaint was, an individual residing in South Chatham, Massachusetts. Ms. Gianoulis was  
24 Decedent’s mother and brings this action in her individual capacity and in her capacity as  
25 administrator of Decedent’s estate.

26 6. Defendant Rise in Glendale Sobriety Center, Inc. is, and at all times relevant to this  
27 complaint was, a California corporation with its principal place of business in Los Angeles  
28 County, California. Rise in Glendale is a licensed Drug Abuse Treatment Facility, as defined in

1 Health and Safety Code section 11834.02 and is not a “health care provider” as defined in Civil  
2 Code sections 3333.1 and 3333.2 or Code of Civil Procedure section 340.5.

3 7. Defendant Robert Akopyan (“Akopyan”) is, and at all times relevant to this  
4 complaint was, an individual residing in Los Angeles County, California. Plaintiff is informed and  
5 believes that Akopyan is an equity owner (either direct or indirect) of Rise in Glendale. Plaintiff is  
6 informed and believes and on that basis alleges that Akopyan, as the beneficial owner of Rise in  
7 Glendale, dominated, controlled, managed, and operated Rise in Glendale, that Rise in Glendale  
8 carried none of the formalities required of a limited liability company, that Rise in Glendale was so  
9 inadequately capitalized and underinsured that, when compared with the nature and risks inherent  
10 in operating an inpatient detoxification facility, its capitalization was illusory, and that Rise in  
11 Glendale was a mere instrumentality and conduit to further the personal interests of Akopyan, to  
12 the detriment of Plaintiff. As a result, there exists, and at all times mentioned herein existed, a  
13 unity of interest and ownership among Akopyan and Rise in Glendale such that the defendants  
14 have no genuine or separate existence. Plaintiff is further informed and believes that at all times  
15 relevant to this complaint, Akopyan, completely controlled, dominated, managed, and operated  
16 Rise in Glendale and intermingled his personal assets with the assets of Rise in Glendale to suit  
17 their convenience, such that the individuality or separateness of the defendants did not exist and it  
18 would be unfair to Plaintiff if the acts set forth in this complaint were treated as the those of Rise  
19 in Glendale alone. Plaintiff is further informed and believes, and on that basis alleges, that since  
20 committing the unlawful conduct leading to Decedent’s death, Rise in Glendale ceased operations  
21 and has taken affirmative steps to avoid creditors, including Plaintiff.

22 8. Plaintiff is informed and believes and on that basis alleges that Defendant Gary  
23 Dabbah (“Dabbah”) is, and at all times relevant to this complaint was, an individual residing in  
24 Los Angeles County, California. Plaintiff is informed and believes and on that basis alleges that at  
25 all times relevant to this complaint, Dabbah was an employee of Rise in Glendale.

26 9. Plaintiff is informed and believes and on that basis allege that Defendant Melineh  
27 Vartanian (“Melineh”) is, and at all times relevant to this complaint was, an individual residing in  
28 Los Angeles County, California. Plaintiff is informed and believes and on that basis alleges that at

1 all times relevant to this complaint, Melineh owned 3449 Stancrest Dr., Glendale, California  
2 91208, the property from which Rise in Glendale operated and the location where Decedent died.

3 10. Plaintiff is informed and believes and on that basis alleges that Defendant Vazgen  
4 Vartanian (“Vazgen”) is, and at all times relevant to this complaint was, an individual residing in  
5 Los Angeles County, California. Plaintiff is informed and believes and on that basis allege that at  
6 all times relevant to this complaint, Vazgen owned 3449 Stancrest Dr., Glendale, California 91208,  
7 the property from which Rise in Glendale operated and the location where Decedent died.

8 11. Plaintiff is unaware of the true names and capacities of the defendants sued as Does  
9 1 through 10, inclusive, and therefore sues these defendants by fictitious names. Plaintiff will  
10 amend this Complaint to allege the true names and capacities when the same have been  
11 ascertained. Plaintiff is informed and believe, and on that basis allege, that each of the fictitiously  
12 named defendants is responsible in some manner for the occurrences herein alleged and that  
13 Plaintiff’s damages were proximately caused by said defendants’ conduct.

#### 14 NATURE OF THE CASE

##### 15 **A. Alex’s First Encounter with Rise in Glendale**

16 12. Decedent Alexander William DeCarli (“Alex”) suffered from major depressive  
17 disorder, high impulsive behavior, and alcohol abuse and dependance. In an effort to achieve  
18 sobriety for the first time, Alex sought the help of Rise in Glendale, an inpatient detoxification  
19 provider licensed by the California Department of Healthcare Services (“DHCS”).

20 13. On September 3, 2024, Alex had his first encounter with Rise in Glendale. Alex  
21 initially met with Zachary Dorfman. After this conversation, Rise in Glendale on September 8,  
22 2024 at 9:45 p.m. admitted Alex for medical detoxification services. As part of Alex’s admission,  
23 Alex signed an agreement titled “IMS Admission & Financial Agreement.” This agreement  
24 required Alex to pay \$8,500 per day to Rise in Glendale.

##### 25 **B. Intake, Medical Examination, and Admission**

26 14. For approximately two hours on the night of September 8, 2024, Alex underwent an  
27 intake with Gary B. Dabbah, RAD-T (“Mr. Dabbah”). During this intake, Alex submitted to an  
28

1 initial drug screening, a COVID test, and various medical assessments, including a Clinical  
2 Institute Withdrawal Assessment for Alcohol (“CIWA”).

3 15. Alex tested negative for COVID but did test positive for alcohol and marijuana.  
4 Additionally, Alex presented with hypertension and extensive withdrawal symptoms, including  
5 sweating, tremors, nausea and vomiting, and diarrhea. Mr. Dabbah assigned Alex a COW score of  
6 23 (consistent with moderate withdrawal) and a CIWA-AR score of 20 (consistent with severe  
7 withdrawal.

8 **C. Overnight Treatment and Morning Findings**

9 16. After intake, Alex was shown to his room, given no medication,<sup>1</sup> and was set up to  
10 rest for the evening. Overnight staff purportedly checked on Alex every 30 minutes according to  
11 Rise in Glendale’s handwritten observation logs. These checks were only observational. Rise in  
12 Glendale never took or reported vitals during these checks. Plaintiff is informed and believes that  
13 the handwritten observation logs used pre-filled times that do not accurately reflect the times staff  
14 purportedly checked on Alex.

15 17. The next morning after around 8:15 a.m., staff began morning rounds. Precious  
16 Stovall (“Ms. Stovall”) attempted to wake Alex and his roommate, Boachie, up for breakfast and  
17 their morning medication. Alex did not respond. When Ms. Stovall checked his pulse and “felt  
18 nothing,” she ran to get her stethoscope to confirm the finding. When Ms. Stovall heard no heart  
19 sounds, she began CPR while asking Amenda Priello (“Ms. Priello”) for a defibrillator. Ms. Priello  
20 could not find a defibrillator and Alex was pronounced dead at 8:41 a.m.

21 **D. Rise in Glendale Failed to Recognize that Alex Was Having a Heart Attack**

22 18. Admission into a detoxification facility like Rise in Glendale requires the medical  
23 director to either conduct a medical evaluation or document his review and concurrence of a  
24 medical evaluation conducted by another physician. The physical exam should include most  
25 notably evaluations of organ systems for possibility of cardiac abnormalities.

26 //

27 \_\_\_\_\_  
28 <sup>1</sup> Rise in Glendale cannot claim otherwise, as no medication logs exist in Alex’s medical file from  
Rise in Glendale or in the documents provided by Rise in Glendale to DHCS.

1           19.     Rise in Glendale never had a medical director evaluate Alex. Instead Rise in  
2 Glendale’s Clinical Director, Amy Karman (“Ms. Karman”) pre-certified Alex’s admission four  
3 days before Alex arrived at the facility.

4           20.     Nevertheless, Alex was admitted to Rise in Glendale with tremors, sweating,  
5 nausea, and vomiting. All of which can be symptoms of withdrawal, however Alex also presented  
6 with hypertension. Heart attacks are a known and foreseeable risk of detoxification. Plaintiff is  
7 informed and believes that Rise in Glendale failed to treat or render care to Alex who was  
8 suffering from symptoms of a heart attack at, during, and/or after admission.

9     **E.     Alex Should Have Been Referred to a Hospital**

10          21.     When entering Rise in Glendale, Alex presented with hypertension, a high pulse  
11 rate, symptoms of a heart attack, and severe withdrawal symptoms. Alex should have been referred  
12 to a hospital.

13          22.     Plaintiff is informed, believes, and alleges that Rise in Glendale downplayed Alex’s  
14 withdrawal on the COWS scale leaving potential points unreported to avoid classifying Alex’s  
15 withdrawal as severe. By downplaying Alex’s symptoms, Rise in Glendale avoided referring Alex  
16 to a hospital where his symptoms could have been medically treated and managed.

17          23.     Rise in Glendale was unfit to provide the medical care Alex required. Instead of  
18 referring Alex to a hospital, Rise in Glendale downplayed his withdrawal symptoms and admitted  
19 Alex to begin billing him for his treatment.

20          24.     Rise in Glendale advertises itself on its website as an alcohol and drug treatment  
21 center that “are designed with 24/7 medical supervision so you can safely and comfortably detox  
22 from alcohol, opioids or other drugs before starting your addiction treatment program.”<sup>2</sup>

23          25.     Rise in Glendale used these promises to lure clients into its care while receiving  
24 thousands of dollars per day, per client. Simply put, Rise in Glendale failed to deliver on these  
25 promises and failed to provide the safety that it advertised.

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27     //

28     \_\_\_\_\_  
<sup>2</sup> See <https://www.risesobrietycenter.com>.



1 Code of Regulations, Title 9, Division 4, Chapter 5, Sections 10563, 10568, and 10569, as well as  
2 DHCS Alcohol and/or Other Drug Program Certification Standards 11000, 11030, 12000, 12020,  
3 and 16000. Decedent was within the class of individuals these laws and regulations were designed  
4 to protect.

5 32. Defendants breached these duties of care by: (a) failing to conduct an appropriate  
6 intake and physical examination; (b) failing to appropriately monitor Alex during the  
7 detoxification process; and (c) ignoring and downplaying Alex's symptoms to avoid referring Alex  
8 to a hospital.

9 33. As a direct and proximate result of Defendants' breaches of these duties, Alex  
10 perished, and Plaintiff suffered harm, the extent of which will be proven at trial.

11 34. The conduct of Defendants, specifically their total failure to provide necessary care  
12 to Alex while employing a business model that knowingly endangers the lives of its residents and  
13 collecting high fees, was malicious, oppressive, and demonstrated a reckless disregard of  
14 Plaintiff's rights. This conduct entitles Plaintiff to recover from Defendants punitive damages  
15 sufficient to punish them and deter similar conduct in the future.

## 16 **SECOND CAUSE OF ACTION**

### 17 **Negligent Undertaking**

18 (Against Rise in Glendale, Akopyan, Dabbah, and Does)

19 35. Plaintiff repeats and reallege each and every allegation set forth in the foregoing  
20 paragraphs of this complaint as though set forth fully herein.

21 36. Defendants provided addiction treatment which supplies, among other services,  
22 supervision, guidance, oversight, and care while an alcohol dependent resident goes through the  
23 initial stages of detoxification and life-threatening withdrawal.

24 37. Defendants provided detoxification services to Alex. Defendants had a duty to  
25 recognize, refer, and render care that were essential for Alex's protection and well-being.

26 38. Defendants breached its duty of care by failing to adequately supervise and care for  
27 Alex. Namely, Defendants reached its duty of care by knowingly downplaying Alex's withdrawal  
28

1 symptoms and avoiding completing a physical examination which would have been critical in  
2 referring Alex to a hospital.

3 39. As a direct and proximate result of Defendants' breaches of these duties, Alex  
4 perished, and Plaintiff suffered harm, the extent of which will be proven at trial.

### 5 **THIRD CAUSE OF ACTION**

#### 6 **Negligent Hiring, Supervision, and Retention**

7 (Against Rise in Glendale, Akopyan, and Does)

8 40. Plaintiff repeats and reallege each and every allegation set forth in the foregoing  
9 paragraphs of this complaint as though set forth fully herein.

10 41. Defendants hired employees responsible for providing detoxification and  
11 rehabilitation services to Alex. These employees were unfit and incompetent to perform work for  
12 which they were hired.

13 42. Defendants knew or should have known that these employees were unfit and  
14 incompetent and that their unfitness created a particular risk to Rise in Glendale's clients.

15 43. The unfitness and incompetence of Defendant's employees harmed Plaintiff. Had  
16 Defendants properly supervised Alex, and had they administered proper care in a timely manner,  
17 Alex would have survived.

18 44. Defendants' negligence in hiring, retaining, and supervising these employees was a  
19 substantial factor in causing Plaintiff's harm.

### 20 **FOURTH CAUSE OF ACTION**

#### 21 **Violation of the Elder Abuse and Dependent Adult Civil Protective Act**

22 (Against Rise in Glendale, Akopyan, and Does)

23 45. Plaintiff repeats and realleges each and every allegation set forth in the foregoing  
24 paragraphs of this complaint as though set forth fully herein.

25 46. Defendants owns and operates a residential treatment facility that provides, among  
26 other services, supervision, guidance, oversight, and support to individuals seeking to maintain  
27 sobriety and reintegrate into society. On September 8, 2024, Defendants accepted Alex for  
28 detoxification. Defendants accepted custody of Alex with full awareness that he was a "dependent

1 adult” as defined by Welfare and Institutions Code section 15610.23, given Alex was seeking  
2 alcohol withdrawal, detoxification, and rehabilitation treatment and was admitted as an inpatient  
3 resident of Defendants.

4 47. When he was admitted into the custodial care of Defendants, Alex was suffering  
5 from alcohol use disorder. Alex was a dependent adult because Alex suffered from addiction, a  
6 physical, mental, and emotional disability which limited or stripped Alex’s ability to exercise the  
7 degree of self-care and self-regulation that a reasonable person without that condition would have  
8 exercised.

9 48. Defendants, having assumed the caretaking and custodial care of Alex, and as a part  
10 of that custodial care, agreed to and assumed the duty of supplying the regulation that Alex could  
11 not provide for himself, to vigilantly provide care and supervision for Alex’s health and sobriety,  
12 and to protect Alex from safety hazards.

13 49. As described above, Defendants breached this duty by failing to protect Alex from  
14 health and safety hazards and failing to provide any meaningful care, medical or otherwise, to Alex  
15 during Alex’s brief but fatal stay at Defendants.

16 50. Defendants’ actions set forth above constitute “neglect” and/or “recklessness”  
17 within the meaning of Welfare and Institutions Code section 15610.57 and the Elder Abuse and  
18 Dependent Adult Civil Protective Act and constitute either a deliberate disregard of the high  
19 degree of probability that an injury would occur, or a conscious choice as to a course of action with  
20 knowledge of the serious danger involved in such action.

21 51. As a direct result of the conduct alleged herein, Alex died, and Plaintiff was harmed  
22 in an amount to be proven at trial.

23 52. The conduct of Defendants, specifically its total failure to provide necessary care to  
24 Alex while employing a business model that knowingly endangers the lives of its clients while  
25 collecting high fees, was malicious, oppressive, and demonstrated a reckless disregard of  
26 Plaintiff’s rights. This conduct entitles Plaintiff to recover from Defendants punitive damages  
27 sufficient to punish them and deter similar conduct in the future.

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1 **FIFTH CAUSE OF ACTION**

2 **Survivorship**

3 (Against All Defendants)

4 53. Plaintiff repeats and realleges each and every allegation set forth in the foregoing  
5 paragraphs of this complaint as though set forth fully herein.

6 54. Alex suffered bodily injury, pain and suffering, and damages as a result of the  
7 wrongful conduct set forth herein. Had Alex survived, he would have personal claims for bodily  
8 injury, pain and suffering, and damages against Defendants, and each of them.

9 55. This survival action is brought pursuant to Code of Civil Procedure section 377.20,  
10 *et seq.*

11 **SIXTH CAUSE OF ACTION**

12 **Premises Liability**

13 (Against Melineh, Vazgen, and Does)

14 56. Plaintiff repeats and realleges each and every allegation set forth in the foregoing  
15 paragraphs of this complaint as though set forth fully herein.

16 57. Defendants Melineh and Vazgen owned 3449 Stancrest Dr., Glendale, California  
17 91208, the property from which Rise in Glendale operated.

18 58. The property was in a dangerous condition at the time of Decedent's admission,  
19 stay, and death. Among other issues, the property lacked required emergency equipment, was  
20 inadequately configured for detoxification services, and was unsafely staffed.

21 59. These dangerous conditions created a reasonably foreseeable risk of the kind of  
22 injury that occurred.

23 60. Melineh and Vazgen had notice of the dangerous conditions for sufficient time to  
24 have protected against them.

25 61. Melineh and Vazgen's negligence was a substantial factor in causing Plaintiff's  
26 harm.

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1 **SEVENTH CAUSE OF ACTION**

2 **Violations of the Unfair Competition Law**

3 (Against Rise in Glendale, Akopyan, and Does)

4 62. Plaintiff repeats and realleges each and every allegation set forth in the foregoing  
5 paragraphs of this complaint as though set forth fully herein.

6 63. Business and Professions Code section 17200, *et seq.* (the “UCL”) prohibits any  
7 “unlawful, unfair, or fraudulent business act or practice.” Defendants have engaged in unlawful,  
8 unfair, and fraudulent business acts and practices in violation of the UCL.

9 64. The acts of the Defendants set forth above constitute a violation of the “unlawful”  
10 prong of the UCL.

11 a. Specifically, Defendants violated the following laws governing state-  
12 licensed residential detoxification programs:

- 13 i. California Code of Regulations, Title 9, Division 4, Chapter 5,  
14 Section 10563, governing “Accountability”;
- 15 ii. California Code of Regulations, Title 9, Division 4, Chapter 5,  
16 Section 10568, governing “Resident Records”;
- 17 iii. California Code of Regulations, Title 9, Division 4, Chapter 5,  
18 Section 10569, governing “Personal Rights”;
- 19 iv. DHCS Alcohol and/or Other Drug Program Certification Standards  
20 11000, governing “Detoxification Services”;
- 21 v. DHCS Alcohol and/or Other Drug Program Certification Standards  
22 11030, governing “Residential Detoxification Practices”;
- 23 vi. DHCS Alcohol and/or Other Drug Program Certification Standards  
24 12000, governing “Program Administration”;
- 25 vii. DHCS Alcohol and/or Other Drug Program Certification Standards  
26 12020, governing “Client Files”; and
- 27 viii. DHCS Alcohol and/or Other Drug Program Certification Standards  
28 16000, governing “Participant Rights.”



1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff respectfully request that this Court enter judgment against  
3 Defendants and in favor of Plaintiff and grant the following relief:

- 4 A. An award of general damages in an amount to be proven at trial;  
5 B. An award of special damages in an amount to be proven at trial;  
6 C. An award of punitive damages in an amount to be proven at trial;  
7 D. An award of burial, funeral, and related damages in an amount to be proven at trial;  
8 E. An award of wrongful death damages, including the loss of love, society, affection,  
9 (present and future) in an amount to be proven at trial;  
10 F. Restitution and disgorgement pursuant to the UCL and FAL;  
11 G. Preliminary and permanent injunctive relief prohibiting First Steps' business  
12 practice of making false and misleading statements to California consumers;  
13 H. Preliminary and permanent injunctive relief requiring Defendants' compliance with  
14 rules and regulations promulgated by DCHS;  
15 I. An award of attorney's fees pursuant to Code of Civil Procedure section 1021.5;  
16 J. An award of attorney's fees pursuant to Welfare and Institutions Code section  
17 15657;  
18 K. An award of costs of suit incurred herein;  
19 L. Prejudgment and post-judgment interest at the maximum legally allowable rate; and  
20 M. Such other relief that the Court deems just and proper.

21  
22 Dated: May 26, 2026

MILLS SADAT DOWLAT LLP

23  
24 By: 

Arash Sadat

25  
26 Attorneys for Plaintiff  
27 Julee Gianoulis  
28