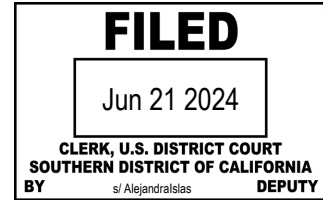


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4 AYNUR BAGHIRZADE, IN PRO PER SE

5 **UNITED STATES DISTRICT COURT FOR THE**
6 **SOUTHERN DISTRICT OF CALIFORNIA**

7 AYNUR BAGHIRZADE, an individual,
8
9 Plaintiff,

10 vs.

11 ARMENIAN NATIONAL COMMITTEE OF)
12 AMERICA; ARAM HAMPARIAN, an)
13 individual; ARMENIAN NATIONAL)
14 COMMITTEE OF AMERICA WESTERN)
15 REGION; ARMEN SAHAKYAN, an)
16 individual; YELP, Inc., an American Company;)
17 JEREMY STOPPELMAN, an individual;)
18 GOOGLE, Inc., an American Company;)
19 ALPHABET INC., an American Company;)
20 ORANGE COUNTY BAR ASSOCIATION; a)
21 California Nonprofit Mutual Benefit)
22 Corporation; TRUDY LEVINDOFSKE, an)
23 individual; ORANGE COUNTY BAR)
24 ASSOCIATION LAWYER REFERRAL)
SERVICE & INFORMATION SERVICE;)
25 TERESA VUKI, an individual; LOS)
ANGELES COUNTY BAR ASSOCIATION, a)
26 California Nonprofit Mutual Benefit)
27 Corporation; LOS ANGELES COUNTY BAR)
ASSOCIATION SMARTLAW LAWYER)
28 REFERRAL SERVICES; SETH CHAVEZ, an)
individual; COCO SU, an individual;)
ATTORNEY SEARCH NETWORK, a Lawyer)
Referral and Information Service; JAKE)
BALOIAN, an individual; MARTINDALE-)
NOLO, an American company; LEGAL)
MATCH, an American company; ESTRELLA)
SANCHEZ, an individual; DOES 1)
THROUGH 300, inclusive)

29 Defendants

Case No.: '24CV1077 RSH KSC

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF; REQUEST FOR
INVESTIGATION**

- 1. Racketeering activity in violation of Sec. 1962 (c) et seq. of the Racketeer Influenced and Corrupt Organizations Act;
- 2. Control of the Enterprise conducting racketeering activity in violation of Sec. 1962 (b) et seq. of the Racketeer Influenced and Corrupt Organizations Act;
- 3. Conspiracy in violation of Sec. 1962 (d) et seq. of the Racketeer Influenced and Corrupt Organizations Act;
- 4. Conspiracy in restraint of trade or commerce in violation of the Sec. 1 et seq. of the Sherman & Clayton Act 15 U.S.C.;
- 5. Denial of Public Accommodation in Violation of Section 2000a of Civil Rights Act 42 U.S.C.;
- 6. Prohibited Restraints on competition in violation of Sec. 16720, et seq. of California Business & Professional Code;
- 7. Unfair Competition in violation of Section 17200, et seq. of California Business and Professional Code;
- 8. Denial of Public Accommodation in violation of Sec. 51, et seq. of California Civil Code;
- 9. Harassment in violation of Sec. 527.6 of the Code of Civil Procedure;
- 10. Defamation;
- 10. Malicious Prosecution
- 11. Intentional Infliction of Emotional Distress
- 12. Negligent Infliction of Emotional Distress

DEMAND FOR JURY TRIAL

30 PLAINTIFF AYNUR BAGHIRZADE ("PLAINTIFF") alleges and
31 complains against DEFENDANTS ARMENIAN NATIONAL COMMITTEE OF AMERICA

1 (ANCA), ARAM HAMPARIAN, an individual; ARMENIAN NATIONAL COMMITTEE OF
2 AMERICA WESTERN REGION (ANCAWR); Armen Sahakyan, an individual; YELP, Inc., an
3 American company (“YELP”); JEREMY STOPPELMAN, an individual; Google, LLC, an
4 American company (“GOOGLE”); ALPHABET Inc., an American company (“Google”);
5 Orange County Bar Association (OCBA), a California Nonprofit Mutual Benefit Corporation;
6 TRUDY LEVINDOFSKE, an individual; Orange County Bar Association Lawyer Referral &
7 Information Service (OCBA LRIS), TERESA VUKI, an individual; Los Angeles County Bar
8 Association (LACBA), a California Nonprofit Mutual Benefit Corporation; Los Angeles County
9 Bar Association SmartLaw Lawyer Referral Services (LACBA SLRS); SETH CHAVEZ, an
10 individual; COCO SU, an individual; Attorney Search Network (ASN), a California Bar
11 certified Lawyer Referral Service, JAKE BALOIAN, an individual; MARTINDALE NOLO, an
12 American company; LEGAL MATCH, an American company, ESTRELLA SANCHEZ, an
individual as follows:

13
14 **I. PARTIES**

15
16 1. PLAINTIFF’s business (initially Law Offices of Aynur Baghirzade and
17 then ACCURA LAW FIRM) provided and currently provides legal services in Orange, San
18 Diego and Los Angeles counties of the State of California. Plaintiff currently resides in San
19 Diego county, California, and the address hereby is used only for the mailing purposes.

20 2. PLAINTIFF is confused about true incorporation status of the
21 DEFENDANT ANCA as the purpose of the organization announced on its web-site does not
22 conform to the purpose of the tax exemption form PLAINTIFF discovered about this
23 organization. According to DEFENDANT ANCA’S website this organization is “the largest
24 Armenian American political organization”, but according to IRS forms it is tax exempt
25 “educational” organization. PLAINTIFF therefore sues DEFENDANT both as a political
26 organization and as any kind of tax exempt non-profit organization, or in any other its form and
27 capacity. PLAINTIFF also is informed and believes, and based thereon alleges, that
28 DEFENDANT ANCA is a resident of Washington, DC.

1 3. PLAINTIFF is informed and believes, and based thereon alleges, that
2 INDIVIDUAL DEFENDANT ARAM HAMPARIAN, is an Executive Director of DEFENDANT
3 ANCA;

4 4. PLAINTIFF is informed and believes, and based thereon alleges, that
5 DEFENDANT ANCAWR is a regional division of DEFENDANT ANCA, which is based in
6 Glendale, California.

7 5. PLAINTIFF is informed and believes and based thereon alleges, that
8 INDIVIDUAL DEFENDANT ARMEN SAHAKYAN is an Executive Director of ANCAWR.

9 6. PLAINTIFF is informed and believes and based thereon alleges, that
10 DEFENDANT YELP, Inc., is an American company with headquarters in San Francisco, California.

11 7. PLAINTIFF is informed and believes and based thereon alleges, that
12 INDIVIDUAL DEFENDANT JEREMY STOPPELMAN is an Executive Director of
13 DEFENDANT YELP;

14 8. PLAINTIFF is informed and believes, and based thereon alleges, that
15 DEFENDANT GOOGLE, LLC, is an American company with headquarters in Mountain View,
16 California.

17 9. PLAINTIFF is informed and believes, and based thereon alleges, that
18 DEFENDANT ALPHABET, Inc., is an American company with headquarters in Mountain View,
19 California;

20 10. PLAINTIFF is informed and believes, and based thereon alleges, that
21 DEFENDANT OCBA is a Nonprofit Mutual Benefit Corporation organized under the laws of
22 the State of California.

23 11. PLAINTIFF is informed and believes and based thereon alleges, that
24 INDIVIDUAL DEFENDANT TRUDY LEVINDOFSKE is an Executive Director of
25 DEFENDANT OCBA;

26 12. PLAINTIFF is informed and believes, and based thereon alleges, that
27 DEFENDANT OCBA LRIS, is a Lawyer Referral Service of the DEFENDANT OCBA, which
28 is certified by the State Bar of California.

1 13. PLAINTIFF is informed and believes, and based thereon alleges, that
2 INDIVIDUAL DEFENDANT TERESA VUKI is the Public Services Manager, who also
3 manages OCBA LRS at DEFENDANT OCBA LRS;

4 14. PLAINTIFF is informed and believes, and based thereon alleges, that
5 DEFENDANT LACBA, is a Nonprofit Mutual Benefit Corporation organized under the laws of
6 the State of California.

7 15. PLAINTIFF is informed and believes, and based thereon alleges, that
8 DEFENDANT LACBA SLRS, is a Lawyer Referral Service of the DEFENDANT LACBA,
9 which is certified by the State Bar of California.

10 16. PLAINTIFF is informed and believes, and based thereon alleges, that
11 INDIVIDUAL DEFENDANT SETH CHAVEZ is a Director of Operations at DEFENDANT
12 LACBA.

13 17. PLAINTIFF is informed and believes, and based thereon alleges, that
14 INDIVIDUAL DEFENDANT COCO SU is a Director at DEFENDANT LACBA SLRS;

15 18. PLAINTIFF is informed and believes, and based thereon alleges, that
16 DEFENDANT ASN is a Lawyer Referral Service certified by the State Bar of California.

17 19. PLAINTIFF is informed and believes, and based thereon alleges, that
18 DEFENDANT JAKE BALOIAN is an Executive Director at DEFENDANT ASN.

19 20. PLAINTIFF is informed and believes, and based thereon alleges, that
20 DEFENDANT MARTINDALE-NOLO, is an American company with its office in Pleasanton,
21 California.

22 21. PLAINTIFF is informed and believes, and based thereon alleges, that
23 DEFENDANT LEGAL MATCH, is an American company headquartered in Reno, Nevada;

24 22. PLAINTIFF is informed and believes, and based thereon alleges, that
25 INDIVIDUAL DEFENDANT ESTRELLA SANCHEZ is a Key Account Manager at
26 DEFENDANT LEGAL MATCH.
27
28

II. JURISDICTION AND VENUE

1
2
3 23. PLAINTIFF brings this action under the Racketeering Influenced Corrupt
4 Organization Act, 18 U.S.C. Sec. 1962 (a) - (d); Sherman & Clayton Act, 15 U.S.C.; Civil Rights
5 Act, 42 U.S.C.

6 24. This Court has jurisdiction pursuant to the following statutes:

- 7
8 a. 18 U. S. C. Sec. 1964 (a) under Racketeer Influenced Corrupt Organiza-
9 tion Act (“RICO”).
10 b. 28 U.S.C. Sec. 1331 for claims arising under U.S. Constitution and U.S.
11 Laws.
12 c. Under diversity of jurisdiction as one or several of the DEFENDANTS are
13 residents of different states.

14
15 25. Venue is proper in this judicial district pursuant to the following statutes:

- 16 a. 18 U.S.C. Sec. 1965 under RICO
17 b. 15 U.S.C. Sec. 15(a) under Sherman and Clayton Act
18 c. 28 U.S.C. Sec. 1391 (b) because the DEFENDANTS targeted
19 PLAINTIFF and her business in this district.
20

21 **III. GENERAL ALLEGATIONS**

22
23 26. This lawsuit is brought because PLAINTIFF’S U.S. business suffers
24 significant losses as a result of DEFENDANTS’ actions.

25 27. PLAINTIFF is a citizen of the Azerbaijan Republic, who is currently a green
26 card holder and resides in San Diego, California.
27
28

1 28. PLAINTIFF got her green card in 2016 as a professional with advanced
2 degree & outstanding ability (EB-2 with National Interest Waiver), and moved to the United States
3 on a permanent basis in 2021, after pandemic.

4 29. Azerbaijan, where the PLAINTIFF is originally from, has long standing -
5 over 2 centuries conflict with neighborhood Armenia, violent clashes between two countries happen
6 on a regular basis. These violent clashes happen between members of the community on a foreign
7 soil as well.

8 30. On or around July 21, 2020, on the information and facts PLAINTIFF has
9 DEFENDANT ANCAWR organized a demonstration of Armenians near Azerbaijan consulate in
10 Los Angeles. More than 300 Armenians attacked a group of people of around 30 Azerbaijanis and it
11 got very violent very soon. Group of Azerbaijanis called for the help to Los Angeles sheriff,
12 ethnically Azerbaijani Fakhri Mirzaguliyev. Fakhri Mirzaguliyev organized buses and departure of
13 the Azerbaijanis from the area close to the consulate. Many Azerbaijanis were beaten, got severe
14 damages, some of them ended up in hospitals with longstanding bone fractures and other damages.
15 After this incident, a group of Armenians with intent to defraud by using mail and wire sent
16 numerous complaints to Los Angeles Police Department about sheriff Fakhri Mirzaguliyev
17 demanding his resignation, all of those complaints investigation proved to be false and defamatory.

18 31. In November 4, 2020, group of Armenians attacked family owned Turkish
19 restaurant in Los Angeles, they "stormed inside, threw hard wooden chairs at the victims, smashed
20 glassware, destroyed a plexiglass barrier, and overturned tables." Later two of them were indicted
21 for hate crimes (Case USA v. Stepanyan, et al., # 2:21-cr-00188).

22 32. PLAINTIFF upon information and facts believes that DEFENDANTS ANCA
23 and ANCAWR with intent to defraud by using mail and wire organizes smear campaigns against
24 representatives of Azerbaijani and Turkish origin on a regular basis, stalk their residential,
25 businesses addresses as well as their banking information in the United States, and by using its
26 network of Armenians working for the U.S. companies (Armenian Enterprise) regularly harass and
27 defame them to damage their reputation, income, emotional wellbeing and generally to make their
28 life hard in the United States. DEFENDANT ANCA and ANCAWR specifically target people of
Azerbaijani and Turkish origin, who do not recognize Armenian genocide and who by using their
1st Amendment rights speak up the truth about the conflict.

1 33. In 2022, DEFENDANTS ANCA and ANCAWR with intent to defraud
2 targeted Doctor Mehmet Oz during his election campaign to U.S. Senate. Before launching a smear
3 campaign against Dr. Oz DEFENDANT ANCA and ANCAWR several times using wire asked him
4 by tagging his Twitter account whether he recognizes Armenian genocide or not. After getting no
5 response from Dr. Oz, DEFENDANTS ANCA and ANCAWR started calling different ethnic groups
6 not to vote for Doctor Oz and give their voices to another candidate. DEFENDANTS ANCA's and
7 ANCAWR's arguments in launching this outrageous campaign was based specifically on its racist
8 agenda and goals, and had nothing to do with anything else.

9 34. On several occasions PLAINTIFF noticed how DEFENDANTS ANCA AND
10 ANCAWR with intent to defraud using wire targeted Azerbaijani and Turkish businesses in the
11 United States, by encouraging people to demand from the U.S. businesses to stop selling Turkish
12 and Azerbaijani goods, because those countries are "genocidal". Turkish and Azerbaijani owners of
13 the businesses throughout U.S. and in California report that their business accounts at Yelp and
14 Google were shelled with negative reviews, when in 2020 a war started between Azerbaijan and
15 Armenia, which ended up with Armenia's defeat and Azerbaijan's victory.

16 35. PLAINTIFF upon information and facts believe that DEFENDANTS ANCA
17 and ANCAWR use DEFENDANT YELP platform to harass Azerbaijani and Turkish business
18 owners, whose views they do not like in order to suppress their speech in the United States. Yelp is
19 also used against those business owners who dared not to recognize Armenian Genocide. Thus,
20 presumably an Armenian account under the name goliath.the.great in the Instagram targeted a
21 Sacramento business, because his owner openly suggested that he does not believe in Armenian
22 genocide. Immediately afterwards, goliath.the.great using wire and with the intent to defraud asked
23 his community to leave this business "great reviews" on Yelp. After getting multiple negative
24 reviews in his business account the owner of the business, stressed and lost, apologized in
25 Instagram. Goliath.the. great didn't stop on this business owner's apology, but asked him to donate
26 to the Armenian genocide cause, which the latter did, and only afterwards all negative reviews were
27 deleted from his business account.

28 36. PLAINTIFF upon information and facts believe that the same, presumably
Armenian account with slightly changed account name but the same picture goliath.da.great in the
Instagram early in 2023 targeted another person - this time a doctor of Iranian Azerbaijani descent -

1 Frank Aryan's social media business pages with calls to his community to leave there negative
2 reviews, because they didn't like his patriotic videos.

3 37. In 2020, when a war started between Azerbaijan and Armenia, a group of
4 Armenian people announced a reward to anybody, who will report to them the addresses of the
5 Azerbaijani and Turkish residents in the United States, obviously not to send them flowers.

6 38. In March 30, 2023, Australian court issued a judgment for the Plaintiff of
7 Azerbaijani descent Khuraman Armstrong in a defamation lawsuit against people of Armenian
8 origin - Yulia Assatryan, Anna Gabrielyan, Katya Kahramanian (Case No. CI-21-01623), who
9 maliciously made multiple defamatory statements under social business media posts of Khuraman
10 Armstrong in Facebook falsely claiming that they were her customers and didn't like her products.

11 39. PLAINTIFF upon information and facts believes that DEFENDANTS ANCA
12 and ANCAWR are either governed or have significant ties with Armenian Revolutionary Federation
13 ("Dashnaktsutyun' or "ARF") - a national and socialist political party, which was founded in 1890
14 in Russian Empire. Dashnaktsutyun was used by Russian empire in its plans first to divide and
15 occupy Turkey and then Azerbaijan. Members of the Dashnaktsutyun parties were responsible for
16 multiple atrocities and terror acts both in Azerbaijan and Turkey. A research paper prepared by the
17 Terrorism Analysis branch in coordination with FBI in 1984 titled "Global Terrorism: The Justice
18 Commandos of the Armenian Genocide" states that "Terrorism has been an important tactic of ARF
19 since its inception".

20 40. PLAINTIFF upon information and facts believes that DEFENDANTS
21 ANCA AND ANCAWR have significant ties with other terror groups besides ARF. On or around
22 March 11, 2021, DEFENDANT ANCA made a posting on its page in Facebook, expressing
23 gratitude to Governor Newsom for the release of convicted terrorist Hampig Sassounian. Hampig
24 Sassounian is one of the men who back in 1982 killed a Turkish Consul General Kemal Arikan in
25 Los Angeles. A 1996 ATF investigation of decaying dynamite, decoration cord and blasting caps
26 found in Ohio storage locker, led to Mourad Topalian, a Chairman of the DEFENDANT ANCA and
27 JCAG (another recognized terror group). JCAG was responsible for numerous bombings and
28 murders of Turkish officials in the United States and Canada. This investigation helped to unravel
JCAG related bombings in California, Philadelphia, Pennsylvania, New York City, New York, and
the original theft of the dynamite stolen from Kalkaska, Michigan, in 1976.

1 41. In October 4, 1977, Professor Stanford Shaw’s house in Los Angeles was
2 bombed. Professor Stanford Shaw was teaching Ottoman History at the University of California in
3 Los Angeles (UCLA) and was one of those who didn’t recognize Armenian Genocide.

4 42. A research paper prepared by the Terrorism Analysis branch in coordination
5 with FBI in 1984 titled “Global Terrorism: The Justice Commandos of the Armenian Genocide”
6 states that “every Armenian contribute to the terrorist organizations.” They also state that “The
7 ethnic cohesiveness of the Armenian community and its inherent distrust of non-Armenians provide
8 a distinct advantage for Armenian terrorists. In addition to a reluctance of Armenians to talk to
9 police, some segments of the community rallied around arrested Armenian terrorists, providing
10 financial and moral assistance.” On February 5, 2002, Armenian community proudly declared that
11 they raised more than \$ 70, 000 for convicted terrorist - Hampig Sassounian’s defense.

12 43. PLAINTIFF upon information and facts believes that cult of terrorism is
13 widely supported among US Armenian attorneys as well. On or around March 15, 2024 attorney of
14 Armenian descent Aroutin Hartounian placed a photo glorifying the terrorist Soghomon Tehlirian in
15 his Twitter account with the logo of his law firm - Hartounian, a professional law corporation.
16 Soghomon Tehlirian was responsible for murdering of at least two people. Operation Nemesis was
17 carried out by Armenian Revolutionary Federation (ARF), which is now very closely associated
18 with DEFENDANTS ANCA and ANCAWR.

19 44. Later, on May 12, 2024, California licensed attorney Aroutin Hartounian,
20 placed another photo of an old woman with rifle on Mothers’ Day, wishing that every Armenian
21 woman follow the example of this mother on a photo. In the similar way Aroutin Hartounian used
22 his law corporation’s logo on the picture.

23 45. PLAINTIFF upon information and facts assumes that since cult of terrorism
24 is so widely supported by Armenians, the chances that the money earned by them in the United
25 States go for sponsoring of terrorism are high, the same it can be said about the same money coming
26 from terrorist organizations back to U.S. banks and organizations.

27 46. PLAINTIFF upon information and facts assumes that the chances that the
28 money earned by the law firms managed by Armenians end up in terror organizations, or for the
terror purposes are high, the same can be assumed about the flow of this money coming from the

1 terror groups back to U.S. organizations, including bar associations through their respective
2 members.

3 47. PLAINTIFF upon information and facts believes that DEFENDANTS ANCA
4 and ANCAWR have significant ties and/or sponsored by Russia's certain circles to achieve their
5 geopolitical goals. Thus, DEFENDANTS ANCA and ANCAWR are against current democratically
6 elected government of Armenia, and mostly support pro-Russian political candidates. PLAINTIFF
7 noticed on several occasions calls made by the members and leadership of these organizations in
8 Twitter to overthrow an elected government in Armenia, and even assassinate Pashinyan -
9 democratically elected current President of Armenia. Some of their members are even banned from
10 entering Armenia by the current Armenian government for the security reasons. On or around May
11 28, 2024, Arshak Makichyan - an Armenian political activist from Russia, who left the country
12 because of persecution, blamed DEFENDANT ANCA in his Twitter account in being agents of
13 Russia, as they were completely indifferent to his case and didn't help him when he needed it the
14 most, and they also attacked him for his anti-Russian views. On another occasion, PLAINTIFF
15 noticed how another Armenian researcher Sossi Tatikyan complained in her Twitter account that she
16 was receiving threats of being raped for 2 days in row for criticizing DEFENDANT ANCA's pro-
17 Russian tweet.

18 48. PLAINTIFF upon information and facts believes that she is stalked by
19 DEFENDANTS ANCA and ANCAWR from the time she moved to the United States, because of
20 her origin and her critical views on ANCA's activity and in general on Armenian-Azerbaijan
21 conflict.

22 49. PLAINTIFF upon information and facts believes that Armenian Enterprise
23 employed by all DEFENDANTS as well by the State Bar of California, stalks her confidential
24 information, passes it to its other members, to DEFENDANTS ANCA and ANCAWR in order to
25 harass, to intimidate and to damage her business and reputation.

26 50. PLAINTIFF upon information and facts believes that her bank information as
27 well as IOLTA information is stalked by the Armenian Enterprise employed by the State Bar of
28 California and it is passed and disseminated to other its members for the purpose to harass, to
intimidate, to stalk and to damage her business and reputation.

1 51. Plaintiff became active in social media speaking about the conflict
2 approximately from 2020, and since that time she became a target of Armenian Enterprise trying to
3 silence her.

4 52. On or around February 2022, Plaintiff was first time massively harassed on
5 her Twitter account by various Armenian account users, because she was allegedly “using
6 inappropriate sign of wolf”. The person, who was specifically active in doing so was Simon
7 Maghakyan. Simon Maghakyan presents himself as a researcher and PHD student in heritage
8 crimes and has very good ties with ANCA, as evidenced by his numerous speeches on ANCA’s
9 events. Press - release from ANCAWR from 2015 shows that Simon Maghakyan was appointed as a
10 Community Development Coordinator for this organization, thus Simon Maghakyan was presenting
11 and representing ANCA in harassing PLAINTIFF. Simon Maghakyan not only harassed
12 PLAINTIFF by spreading misinformation about her license, but also copied her address displayed
13 at the State Bar’s web-site and placed it on Twitter, tagged State Bar and made complaint on her.

14 53. PLAINTIFF believes that she lives in a free country with 1st Amendment
15 rights and she can’t be persecuted in this country because of her use of the certain national
16 attributes, cultural and historical signs. Sign of a wolf has historical meaning for Turks and any its
17 display is protected by the U.S. Constitution, and thus any attempt to harass and threaten
18 PLAINTIFF for its use was inappropriate effort to suppress PLAINTIFF’s Constitutional rights and
19 force PLAINTIFF to follow “new rules” established by the group of people, who think that they are
20 above Constitution.

21 54. After Mr. Maghakyan placed information about PLAINTIFF’s business and
22 her address on Twitter, PLAINTIFF received two other threats - one in her inbox on Twitter and
23 another one in her phone. One in her Twitter account was that “For every time you will open
24mouth” (and here the Sender compared Turks to cockroaches), “another Khojali will happen, and
25 this time in Irvine.” Khojali is a name of the city in Karabakh region of Azerbaijan, where back in
26 1992-1993 around 613 people, including kids, elderly and women were brutally tortured, raped and
27 killed. This tragedy known as a Khojali genocide was committed by the members of Armenian
28 terror organizations such as ASALA, ARF and others together with Russian 366 CIS regiment. This
message was in fact a death threat sent to the PLAINTIFF. PLAINTIFF suffered emotional
breakdown, shock and severe anxiety, as the address she put on her State Bar of California website

1 was her real home address. PLAINTIFF was a single woman living alone in quite suburban Irvine
2 environment.

3 55. On or around February 20, 2022, PLAINTIFF received another message to
4 her phone stating “The Armenians have put your information everyone all over the night please
5 change your profile, pictures and number take your info off your bio I don’t want you losing the
6 license. Armenians in California have a lot of influence.” PLAINTIFF at that time was forced to
7 restrict her account in order to avoid further exposure to the brutal harassing behavior.

8 56. While PLAINTIFF tweeted in her restricted Twitter account, she wasn’t
9 bothered by anyone. However, on or around April - May, 2023 PLAINTIFF removed all restrictions
10 from her account and made her tweets public again. Immediately afterwards she noticed couple of
11 the defamatory reviews in her business Yelp account. These first defamatory reviews were deleted
12 after PLAINTIFF complained on them to Yelp.

13 57. On or around May, 2023 PLAINTIFF started getting questions from various
14 Twitter account users and also over the phone “Do You recognize Armenian genocide ?”.
15 Approximately at that time she received a call from the unknown person asking her whether she
16 accepts genocide and telling her in a terrible voice that Artsakh (Karabakh region) will be returned
17 back to Armenians. On her question why her tweets so much bother them she received a simple
18 answer “because you become famous”...

19 58. On or around May - June, 2023, PLAINTIFF was repeatedly harassed on
20 Twitter for denying Armenian genocide and for her critical views on Azerbaijan - Armenian
21 conflict, again people from various accounts using wire threatened her with disbarment, placed her
22 information in public, promised to teach her a lesson. At the same time her business account in Yelp
23 was attacked by numerous people, who with intent to defraud and by using wire placed there
24 multiple defamatory reviews, claiming that they were clients of the PLAINTIFF, openly lying and
25 not even concealing the fact that they want to ruin her business, damage her reputation and /or even
26 physically harm her. One of the PLAINTIFF’s business videos disappeared from her business page
27 on Facebook, and was circulated in Twitter, her social media advertisings from her LinkedIn
28 business page disappeared as well. PLAINTIFF’s further requests to LinkedIn management gave no
results.

1 59. On or around April - June 2023, after PLAINTIFF complained to
2 DEFENDANT YELP and requested it to remove all defamatory reviews, explaining to
3 DEFENDANT YELP that they are all coming from people, who have never been her clients and it
4 is an organized smear campaign to ruin her business, all of them were removed. However, on or
5 around May 26, 2023, someone named E. Kerimli (registered in Glendale) with intent to defraud
6 and using wire placed another defamatory review on PLAINTIFF's business platform, claiming that
7 PLAINTIFF took his money and didn't provide him with any service, which was a lie. The fact how
8 the person placed a defamatory review speaks for itself - he placed a review under non - Armenian
9 surname, claiming that PLAINTIFF takes people's money and do not provide a service, thus to
10 make public (including PLAINTIFF's own community) to believe that PLAINTIFF is not an honest
11 person and deceives her clients. PLAINTIFF believes that this review was aimed to damage
12 PLAINTIFF's business as much as possible. PLAINTIFF immediately complained on this review to
13 DEFENDANT YELP and asked to remove it from the platform as soon as possible. On or around
14 May 30, 2023 DEFENDANT YELP with intent to defraud and using wire responded that they can't
15 remove a review because " When reviewing user content, we look at a number of factors, including
16 potential conflicts of interest, privacy concerns, threatening or lewd commentary, and whether the
17 content has been posted to the correct business page. If a review falls within the bounds of our
18 tolerance for strong language, appears to meet our guidelines and reflects the user's personal
19 experience and opinions, it is our policy to let the user stand behind their review." . DEFENDANT
20 YELP by doing so in fact gave its platform to certain group of people to damage PLAINTIFF's
21 business and reputation, to harass and persecute her because of her national origin, religion, color,
22 ancestry and her political opinion. PLAINTIFF also believes that DEFENDANT YELP did so in
23 open violation of its own policy, requiring this platform to remove any review, which comes from
24 non-clients. It is also necessary to mention that the same person's review was immediately deleted
25 from Avvo and BBB platforms, because the account user didn't respond to the inquiries coming
26 from these platforms requesting proof of the legal service.

27 60. Approximately from the period April - June, 2024, PLAINTIFF noticed that
28 some old reviews, which were deleted by DEFENDANT YELP on her request, appeared back on
her business page *with her old dated comments under them*, which clearly suggested that there was
inside job at this company to defraud public and to damage and destroy PLAINTIFF'S business.

1 61. PLAINTIFF upon the information and facts she received believes that
2 DEFENDANT YELP’s platform is used to suppress business owners, who do not recognize
3 Armenian genocide, and generally to kill businesses of those business owners, who do not live up to
4 the agenda and expectations of DEFENDANT ANCA. PLAINTIFF upon information and facts she
5 received also believes that DEFENDANT YELP is a part of Armenian Enterprise and is engaged in
6 an organized crime of bullying and harassing businesses upon requests from the Armenian
7 Enterprise.

8 62. On or around June 17, 2023, a Twitter account user under name Ray
9 (@raydar07) tweeted that PLAINTIFF must understand that actions have consequences, openly
10 admitted that he is a representative of the “Armenian mafia” and proposed her a “deal” - to delete
11 the Yelp reviews in exchange for the PLAINTIFF to delete her Twitter account or at his orders to
12 delete the tweets he wants, adding that the PLAINTIFF will get “a special treatment”. PLAINTIFF
13 refused in either deleting her Twitter account or deleting her tweets.

14 63. On or around June 13, 2023, late in night, PLAINTIFF while being in her
15 own apartment in Irvine, heard strange noises in her garage (the garage was adjacent to her
16 apartment). Plaintiff didn’t pay attention to the noises, however on the following day she discovered
17 a dead rat laying next to her car in the garage. The rat was unusually white and looked well fed for
18 the regular street rat. Horrified and worried PLAINTIFF called to the Property management and
19 asked them to remove the rat. Property management’s employee upon arrival confirmed that it was
20 not a rat, but most likely a pet, and someone brought and put it in her garage. This was right after
21 PLAINTIFF’s business account in Yelp was attacked with numerous fake reviews and she got
22 multiple threats in her inbox and phone.

23 64, On or around June 16, 2023, someone under account name @identicalobject
24 on Twitter by using wire harassed PLAINTIFF by “reminding” her that her career in California is in
25 the hands of California Armenians, which caused great outrage among PLAINTIFF’s own
26 community and other community members. Some of other members of the Armenian community
27 like Lusine Yaghjyan and others with intent to defraud and by using wire placed the link of the State
28 Bar of California on Twitter and publicly asked people to make a complaint about the PLAINTIFF
to the Bar. PLAINTIFF suffered severe emotional distress, frustration, shock and embarrassment as

1 a result of such horrible harassment campaign. Lusine Yaghjyan profile shows that she follows
2 DEFENDANT ANCA and supports this organization.

3 65. From approximately January, 2024, till the end of February, 2024, for about
4 two months, DEFENDANTS ANCA and ANCAWR continuously made defamatory statements
5 about PLAINTIFF in Twitter, Instagram, Reddit and other Platforms by taking her single tweet out
6 of context, distorting, manipulating it and blaming PLAINTIFF that she called for genocide of the
7 Armenians, which was a complete lie. Immediately, after this PLAINTIFF'S emails, social media
8 platforms, her phone number was flooded with threats and intimidating messages, among others
9 calling for her death and disbarment. Among the messages PLAINTIFF received were some stating
10 "Do not cry in Twitter like a Jew", "Nigger", you'll be soon killed, and one message was actually a
11 rap song describing in every detail how PLAINTIFF will be killed similarly as a black guy who was
12 shot in the street in the song (at the time when PLAINTIFF received this message she had no
13 information that it was actually a song). Afterwards, through some of the tweets under her posts in
14 Twitter PLAINTIFF was informed that they know where she lives, one account holder sent her a
15 message " Do not feel safe in that glass building". While DEFENDANTS ANCA and ANCAWR
16 blamed PLAINTIFF in racism, discrimination and other nonexistent characteristics, she was
17 harassed by multiple people because she is a "Jew", a "Black" and therefore she deserves only the
18 death. PLAINTIFF suffered tremendous emotional shock, was very much concerned about her life,
19 was afraid to go out and couldn't work or think about doing any kind of job for about three months.
20 PLAINTIFF'S phone was also attacked from unidentified phone numbers, calling her nonstop at
21 least 20 times per day, screaming obscenities in her ear every time she dared to answer them.

22 66. Immediately after DEFENDANTS ANCA and ANCAWR made defamatory
23 statements about PLAINTIFF her Yelp business account was flooded with fake reviews, claiming
24 that they were clients of the PLAINTIFF, that the service was dissatisfactory and that the
25 PLAINTIFF takes money and do not provide services. One Yelp user put an actual threat in
26 PLAINTIFF'S account that "they will come after her", some other messages in her phone number
27 also suggested that "people will come after you". PLAINTIFF'S business photos were manipulated,
28 distorted and inappropriate photos were placed in her Yelp business account. Despite PLAINTIFF'S
complaints the damaging reviews, including one with the threat and inappropriate pictures were
kept at her business profile for significantly long period of time and were not removed, thus making

1 sure that PLAINTIFF'S business gets damaged as much as possible and she suffers an emotional
2 shock as long as possible.

3 67. On or around February 6, 2024, someone named Solomon S. using wire
4 placed a defamatory review in PLAINTIFF'S Yelp account that PLAINTIFF provided "terrible
5 service" to him. This review came along with hundreds of other fake reviews into PLAINTIFF'S
6 account at the same time. This review was immediately requested by the PLAINTIFF to be
7 removed, however in or around February 8, 2024, DEFENDANT YELP with intent to defraud and
8 by using wire refused from taking down this review and provided a plausible argument for it that
9 "after careful consideration they decided to keep this review." PLAINTIFF does not know what was
10 this "careful consideration" about, while her page was under constant attack for about two months
11 on a daily basis and DEFENDANT YELP was alerted to the fact that something unusual was
12 happening, which had nothing to do with how PLAINTIFF provided services. Moreover,
13 DEFENDANT YELP at the same time kept removing positive reviews about PLAINTIFF'S
14 business to ensure that she has a poor rating. All those reviews were from PLAINTIFF'S clients and
15 by doing so DEFENDANT Yelp clearly announced that it is in a criminal solidarity with other
16 DEFENDANTS on this matter and actively helps them to achieve the result - particularly, to destroy
17 PLAINTIFF'S business, career and life.

18 68. In or around April 30, 2024, after Armenians got unhappy about
19 PLAINTIFF'S another tweet in her personal Twitter account, someone under the name H.G. placed
20 another defamatory review in her business Yelp account claiming that PLAINTIFF "stole his
21 money" and didn't provide the service. PLAINTIFF believes that such vicious reviews were placed
22 by Armenian Enterprise with the the single goal to leave her without any client and any income, and
23 thus punish her for her speech. Despite PLAINTIFF'S complaints to DEFENDANT YELP this
24 review was kept at her business page unchanged under the similar ground that DEFENDANT YELP
25 "carefully reviewed it". Old reviews with old comments started appearing at her business page
26 again and PLAINTIFF, shocked and embarrassed, was forced to ask DEFENDANT YELP to
27 remove them again.

28 69. On or around February 9, 2024, PLAINTIFF sent an email to DEFENDANT
YELP asking it to close her business page as she does not want to keep it open, and also asked to
remove from the platform all reviews. On or around February 9, 2024, DEFENDANT YELP with

1 the intent to defraud responded that they will not close her page unless she pays a fee for the past
2 advertisement. PLAINTIFF YELP was clearly in violation of its terms and conditions when it
3 refused from closing PLAINTIFF'S business page, as there was nothing there allowing YELP to act
4 in this manner or suggesting that the user must pay for the advertisements or any other debts in
5 order to have its page closed. PLAINTIFF asked for the invoice for the advertisement and the
6 amount she was due, but no such information was provided to her. Moreover, PLAINTIFF
7 remembers it very well that she did the advertisement for immigration services, but for unknown
8 reasons she was getting leads in tax law !!! PLAINTIFF believes that DEFENDANT YELP was in
9 conspiracy with Armenian Enterprise for a quite a long time to damage her business, much longer
10 time before fake reviews started appearing at her page. PLAINTIFF believes that DEFENDANT
11 YELP clearly kept her business page open in order to allow Armenian Enterprise to continue
12 harassing her, and payment for the ad was just an excuse.

12 70. Multiple business owners also report that DEFENDANT YELP is corrupt and
13 bullies and harasses businesses to get from them money in exchange for good reviews at their
14 Platform;

15 71. In or around April 15, 2024, PLAINTIFF changed the name of her law firm
16 to ACCURA LAW, and started social media campaign on her Facebook, Instagram and other pages.
17 Immediately her Facebook account was flooded with multiple messages from the people she didn't
18 know claiming that PLAINTIFF is in violation of someone's copyright or trademark.

19 72. From around June, 1 to June 15, 2024, DEFENDANT YELP continued
20 changing the name of her law firm to a new one, while PLAINTIFF was trying to remove all this
21 information. Afterwards, DEFENDANT YELP eventually locked her business name, phone number
22 and other information, so that she can't change anything. At the same time DEFENDANT YELP
23 also disabled PLAINTIFF'S option to edit her comments under the review and to make a comment
24 at all!

25 73. When DEFENDANT ANCA and ANCAWR realized that they couldn't
26 disbar PLAINTIFF, with the intent to defraud they placed her distorted tweet, where as they allege
27 she "called for genocide" in Google Search under her name, DEFENDANTS ANCA and ANCAWR
28 also took care that the headlines for all her name search results come with "to disbar or disbaring
Aynur Baghirzade", so that to make any potential client of the PLAINTIFF to believe that

1 PLAINTIFF is disbarred - the act, clearly aimed on discouraging the clients to work with her, to
2 disparage PLAINTIFF'S reputation, and to leave her with no income and money. It is quite
3 interesting that while many Twitter users supported PLAINTIFF when she tweeted on disagreement
4 with conclusions of DEFENDANTS ANCA and ANCAWR regarding her tweets, those tweets
5 miraculously do not appear in Google search results under her name while ANCA's tweets appear
6 multiple times. PLAINTIFF believes that no one besides the State Bar of California can make a
7 decision on PLAINTIFF's disbarment and these acts of the DEFENDANTS were barbaric attempt
8 to defraud the public into their own decision on the PLAINTIFF.

8 74. One of the headlines, which appears under PLAINTIFF'S name in Google
9 Search is that she as an immigration attorney who "called for genocide". DEFENDANT ANCA
10 knew that PLAINTIFF renders services in Immigration Law - one of the most sensitive areas of
11 Law. Calling for genocide would for sure make clients (especially asylum seekers) to keep away
12 from the PLAINTIFF as an attorney, and this was a particular a goal which DEFENDANT ANCA
13 wanted to achieve by placing or ordering to place such information in Google Search under the
14 PLAINTIFF'S name. This was another way how DEFENDANT ANCA wanted to castrate
15 PLAINTIFF as an attorney from the practice of Law bypassing State Bar's decision.

16 75. PLAINTIFF upon information and facts believes that Armenian Enterprise
17 working for DEFENDANT GOOGLE does everything to place any defamatory information under
18 her name to appear in Google Search. While DEFENDANT ANCA'S tweets and headlines about
19 PLAINTIFF appear in Google Search, none of PLAINTIFF's tweets opposing to DEFENDANT
20 ANCA'S opinion are there. PLAINTIFF also observed how links to particular defamatory and
21 damaging false and manipulated information regularly appears under her name in Google Search,
22 this concerns to every her step, every her move - she is under constant surveillance by
23 DEFENDANT ANCA.

23 76. PLAINTIFF recalls that her Google business page under her old name
24 suddenly disappeared from the internet. The page was verified by GOOGLE.

25 77. Approximately at the beginning this year PLAINTIFF created again her new
26 GOOGLE business page, which was verified by DEFENDANT GOOGLE and active. On or around
27 April 15, 2024, PLAINTIFF changed the name of her law firm to ACCURA LAW, and following
28 this change she did the same edits in her GOOGLE business account. When she attempted to

1 change the address - immediately she was asked for another verification, and not only for simple
2 phone call verification, but she was asked to provide a video of her location. Since the time, when
3 PLAINTIFF was first harassed by Armenians, she got a virtual address for her business, because
4 simply she was scared for her life. PLAINTIFF wrote to DEFENDANT GOOGLE multiple emails
5 trying to explain them that she will not be using her real address, that she will be using electronic
6 address and that she does not want to provide her address, because she does not want it to be
7 known. For unknown reasons DEFENDANT GOOGLE was insisting on video verification and
8 required her actual address, this is after couple of months when her business under its old name was
9 verified by DEFENDANT GOOGLE!

10 78. On or around April 15, 2024, PLAINTIFF had a meeting with
11 DEFENDANT GOOGLE representative, who required her to show her business license and
12 business cards. When PLAINTIFF explained to her that she has 40 days after changing the name of
13 her business to apply for fictitious name registration, and GOOGLE is not an authority to check her
14 registration, and that in any case she is a solo practitioner, and she doesn't even need a license to
15 provide a service, representative didn't want to hear her and continued insisting on showing the
16 license and business cards.

17 79. On or around May 2, 2024, when next time PLAINTIFF made a GOOGLE
18 search for ACCURA LAW she was shocked by discovering that GOOGLE business page of Accura
19 Advokatpartnerselskab - the Denmark law firm appears in search results for San Diego and Orange
20 County areas, while this law firm was not present in California. For comparison, when PLAINTIFF
21 makes a GOOGLE search for VODKA none of the VODKA producing companies in Russia
22 appears in the search results, the results shows vodkas only in San Diego and nearby areas!
23 PLAINTIFF is sure that it was organized campaign of the Armenian Enterprise working for
24 DEFENDANT GOOGLE to deliberately damage her business. PLAINTIFF'S clients applying for
25 her services were confused and constantly asked her questions - where are you guys located ?
26 PLAINTIFF'S further requests to correct the situation were faced with DEFENDANT GOOGLE
27 staff's complete indifference, with some of them arguing that she had to verify her business for her
28 page to be corrected. For unknown reasons. PLAINTIFF'S website was not first appearing in
Google Search results, and first for the searches in San Diego and Orange County areas
DEFENDANT GOOGLE was showing the website of the Denmark Law Firm. Again, while

1 searching for Vodka in California PLAINTIFF couldn't find any vodka outside of California
2 appearing in the Google Search. PLAINTIFF believes that DEFENDANT GOOGLE in the similar
3 way as DEFENDANT YELP became a part of the Armenian Enterprise to deliberately damage her
4 business and confuse her clients.

5 80. On or around May 25, 2024, PLAINTIFF noticed that her GOOGLE
6 business profile appears in the search results on the iPhone, but not on the computers. So,
7 DEFENDANT GOOGLE in order to confuse PLAINTIFF'S clients even more was showing them
8 PLAINTIFF'S business page in GOOGLE search results on cellphones, while it was showing
9 Denmark law firm's results for San Diego and Orange County areas on the computers. When she
10 checked the status of her business profile, she discovered that it was verified. So, while
11 PLAINTIFF'S business profile was verified for the unknown reasons DEFENDANT GOOGLE
12 continued showing to the people Denmark Law Firm in search results on the computer under her
13 law firm's name! On or around May 30, 2024, PLAINTIFF again contacted DEFENDANT
14 GOOGLE and asked immediately to correct situation with her business google profile. However,
15 under various circumstances DEFENDANT GOOGLE'S staff was doing everything to delay the
16 process and to ensure that PLAINTIFF'S business gets damaged as much as possible. Also, while
17 the status of PLAINTIFF'S business profile appeared as verified on the cellphone, it was unverified
18 in search results on computers - PLAINTIFF does not believe that it was a technical problem,
19 mostly it looked like a deliberate cyber-security crime with the purpose to make clients to doubt
20 authenticity of her business, its real existence, and give them a message that the owner of the
21 business is a fraudster - very much in the customs of the Armenian Enterprise.

22 81. PLAINTIFF upon information and facts believes that DEFENDANT
23 ANCA'S goal is to leave PLAINTIFF with no business and make her eventually leave the United
24 States, because she does not recognize Armenian genocide and she dared to speak the truth about
25 true colors and purpose of their organization. DEFENDANT ANCA is not interested at all whether
26 PLAINTIFF'S tweets were true or not, all it is interested in - her complete destruction. PLAINTIFF
27 believes that DEFENDANT ANCA lies to the public in the United States to manipulate public
28 opinion and eventually use the system in the United States to achieve its strategic goal - genocide
recognition, and ultimate partition and division of Turkey and Azerbaijan in order to create Great

1 Armenia on those lands. PLAINTIFF believes that, since her tweets started destroying those lies she
2 became a target of DEFENDANT ANCA.

3 82. PLAINTIFF upon information and facts believes that DEFENDANTS ANCA
4 and ANCAWR do not mind corrupting U.S. system to achieve their goals. On or around September
5 23, 2023, Robert Menendez, a U.S. Senator, having good ties with DEFENDANTS ANCA AND
6 ANCAWR was indicted for bribery, corruption and later for obstruction of justice. Robert
7 Menendez is accused in taking bribes through his wife of the Armenian origin - Nadine Aslanian,
8 for years Robert Menendez was speaking in the Senate against Azerbaijan and Turkish interests,
9 calling for sanctions against these states multiple times.

10 83. PLAINTIFF upon information and facts believes that DEFENDANT ANCA
11 stalks all PLAINTIFF'S court cases in the State of California and uses its ties and connections to
12 delay them and/or not to resolve them in PLAINTIFF'S favor.

13 84. PLAINTIFF'S purpose to move to the United States was to establish here
14 her business (her own law practice), but unfortunately right from the beginning she faced challenges
15 first in her job place and afterwards with referral organizations.

16 85. PLAINTIFF was employed by the Slate Law Group from May 14 till July,
17 21, 2021 and was forced to resign, because the Partner of the Law Firm sent her a fraudulent check
18 as a paycheck. The partner of the law firm was so assured that she will not get punished for her
19 behavior that she even confirmed it in writing that PLAINTIFF is good to cash out the check,
20 knowing that it was fraudulent. Only later PLAINTIFF realized that this was not an accidental,
21 random fake check sent to her, but an indication of more serious problems.

22 86. PLAINTIFF's further attempts to serve her complaint on her former
23 employer - Kelly Duford, turned into real nightmare - with the UPS store owner doing everything
24 not to serve it properly and with San Diego Police Department and DA office refusing to add
25 charges on her complaint to the ongoing criminal case against her former employer. PLAINTIFF
26 revealed during the process that investigation on her former employer was conducted by San Diego
27 DA office together with The State Bar of California.

28 87. According to the Declaration in support of the arrest warrant of Steve Moe
(Declaration), a District Attorney Investigator employed by the San Diego County district Attorney,
the investigation against Kelly Duford started on June 16, 2020. The investigation revealed that

1 “Kelly Duford was retained on a contingency basis to represent clients in different civil matters.
2 Kelly Duford secured settlement agreements, received and deposited the settlement checks into her
3 client trust account or business checking account and spent the money without giving the clients
4 their full share of the settlement funds. Additionally, it was revealed that Williams forged client
5 signatures on settlement checks prior to depositing them.”

6 88. According to the above mentioned Declaration the following clients of Slate
7 Law did not receive their share of settlement funds: “Adam Babin - \$ 98, 300; Rachel Harris - \$ 73,
8 030; Sanae Horowitz - \$ 10, 332; Anna Koparanova - \$ 14, 910; Eric P. Miller - \$ 22, 500; Kristen
9 D. Quick - \$ 21, 440; Fernando Rodriguez - \$15, 550; kia M. Vaara - \$ 15, 200...”

10 89. PLAINTIFF’S complaints in court about the actions of her former employer
11 - Kelly Duford turned into another nightmare: one of the judges concealed from her administrative
12 records asserting that she has never lodged them with the court (which was a complete lie),
13 opposing counsel submitted to the court a fraudulent answer, which was completely ignored by the
14 judge, another judge was delaying the process for no apparent reason, her filings for the default
15 judgment submitted to the court in 2023 were rejected only in May 2024, and her case management
16 conference was also rescheduled from August 2023 to May 2024 for the reasons still unknown to
17 the Plaintiff.

18 90. PLAINTIFF’S own investigation into the matter of Kelly Duford made
19 PLAINTIFF to believe that there is a co-operation between certain attorneys and banks in terms of
20 issuing and giving fake checks, and this was probably a reason why PLAINTIFF had difficulties
21 serving her papers. Moreover, PLAINTIFF’S investigation results also made her to believe that
22 Kelly Duford most probably was allowed to leave the state and escape to another state, where she
23 was apprehended completely accidentally.

24 91. Before PLAINTIFF and her business were targeted, an investigation by
25 Munger, Tolles & Olsen (“MTO”) began in August 26, 2014, responding to a July 31, 2014 “Report
26 of Improper Activity from the Bar’s Chief Trial Counsel” who reported “concerns related to certain
27 actions” of State Bar leaders “that demonstrate a disturbing lack of transparency at the highest
28 levels within the organization”. She claimed, “State Bar leadership is failing to adhere to basic
principles of governance” and “five layer chess game” has “systematically fostered a culture of
intimidation and isolation within the organization.”

1 92. Most notably, Thomas V. Girardi is named 18 times in the report, right
2 alongside the State Bar of California's Thomas Layton who was later revealed to have been
3 receiving bribes in exchange of protection. An entire report section is dedicated to "Perceived
4 Girardi Keese Influence at the Bar."

5 93. Hundreds of complaints were lodged against Girardi by unsuspecting
6 members of public. Girardi's favorite scheme was using settlement monies from one case to pay
7 plaintiffs in another case and then lying to the clients, when they called to find out the status of
8 those settlement checks.

9 94. On February 1, 2023, U.S. attorneys announced Thomas V. Girard and
10 Girardi Keese colleagues David Lira and Christopher Kamon were indicted for wire fraud, allegedly
11 embezzling more than \$ 18 million from clients.

12 95. Complaints were also lodged by unsuspecting members of public against
13 attorney Kenneth Catanzarite. Catanzarite's favorite scheme involves using straws plaintiffs,
14 engaging in non-judicial acts of fraud to build "fake" cases, and then filing sham court documents in
15 pursuit of his own financial interests.

16 96. Some facts about Catanzarite Law corporation suggest it put a lien on their
17 own client's home for \$ 120, 000 for legal services, and later allegedly stole the home valued at an
18 estimated \$ 1. 3 million. In one federal case, Catanzarite took his own client's home in bankruptcy
19 to pay for legal fees, and he concealed it from the Court. He was sanctioned \$ 30, 000 or forced to
20 return home, also admonished by the Court. In another, the judge concluded "Catanzarite's case was
21 a "sham", and he was sanctioned for "wasting everybody's time." In still another, Catanzarite
22 started filing papers on behalf of a partnership, but the court disqualified him concluding he lacked
23 any authority to do so.

24 97. On March 10, 2023, the State Bar of California publicly admitted that it was
25 compromised by corruption and bribery of its employees through private attorneys. The release of
26 two heavily redacted reports "reveal systemic organizational dysfunction that persisted for many
27 years and through many changes of leadership." This dysfunction persists today, as evidenced by
28 the schemes targeting PLAINTIFF.

1 98. State Auditor revealed in Report 2022-030 that there are 700+ State Bar
2 attorneys who receive special treatment in California. Each of these actors' discipline or theft cases
3 closed via at least four 'private letters' (2010-2022).

4 99. On or around September, 2021 PLAINTIFF became a member of OCBA.

5 100. As OCBA provided a mentorship program PLAINTIFF on May 30, 2022
6 applied to get a mentor in Immigration and Business Litigation.

7 101. On or around June 1, 2022, an attorney John Pentecost was selected by the
8 program to meet the Plaintiff. John Pentecost to the best knowledge of the PLAINTIFF practice
9 Business litigation.

10 102. PLAINTIFF during the meeting with attorney John Pentecost informed the
11 latter that she is interested in a mentor in Business Litigation, as she has a lot friends practicing
12 Immigration Law, and she doesn't feel that she really needs a mentor in this area of Law.

13 103. On or around June 27, 2022, PLAINTIFF unexpectedly for her was informed
14 that her selected mentor is Christine Doyle, an immigration law attorney.

15 104. In or around November 1, 2022, PLAINTIFF wrote to Rebecca Manara, a
16 Membership Services Manager at OCBA, asking her whether OCBA can provide her with a mentor
17 in Business Litigation. This email of the Plaintiff was not answered.

18 105. On or around November 9, 2022, PLAINTIFF wrote another email to
19 Rebecca Manara, inquiring her about PLAINTIFF'S request to change the mentor and asking her
20 why the PLAINTIFF was provided with a mentor she didn't ask for.

21 106. The second email of the PLAINTIFF was copied to multiple other attorneys,
22 as PLAINTIFF believes practicing BUSINESS LITIGATION, and she was explained that she can't
23 be guaranteed any mentorship, that she can't be given any mentor in the area she wants, and that
24 OCBA does not have any mentor in Business Litigation for the PLAINTIFF. When PLAINTIFF
25 asked to give her the list of the people who took a decision on her case as well as the list of
26 attorneys in DEFENDANT OCBA'S Business Litigation panel, she was refused because "she was
27 not entitled to this information", though nobody could explain what special privilege applies to this
28 information if OCBA'S website specifically and openly announces that they provide mentorship
program and if it discloses that they have a panel of Business Litigation attorneys.

1 107. On or around December 2022, PLAINTIFF started surfing DEFENDANT
2 OCBA's website for the application guidelines to join their referral services. PLAINTIFF was
3 explained that the subscription for the referral service is valid only for 1 calendar year and that in
4 order to join the service PLAINTIFF has to have either Orange County residence or main business
5 office in Orange County *as well as a phone number starting with the orange county area code.*
6 PLAINTIFF'S current phone number at that moment was with San Diego area code, and
7 PLAINTIFF had to obtain and open a second phone line to join the referral service.

8 108. After spending significant amount of time to obtain a second phone line
9 PLAINTIFF applied on or around January 17, 2023 to join OCBA LRIS.

10 109. One of the requirements to join the referral service was to submit a check
11 with a payment for membership. PLAINTIFF called to OCBA on or around January 18, 2023, and
12 spoke to Olivia Torres. Olivia Torres informed PLAINTIFF that she can make a payment
13 electronically after she gets an invoice. In couple of days PLAINTIFF called again Olivia Torres as
14 she got no invoice from her, after reaching out to her, PLAINTIFF was explained that Olivia Torres
15 is busy and that PLAINTIFF will get an invoice as soon as possible. When after several more days
16 PLAINTIFF got no invoice, she reviewed OCBA LRISA Rules and found out that the payment
17 according to the Rules must be made by check, not electronically. Rules had no provisions that
18 applicants can make membership payments electronically.

19 110. On or around January 20, 2023 PLAINTIFF sent another email to OCBA
20 LRIS asking to provide her with any update about her membership application and payment.
21 Having heard nothing from OCBA on or around January 21, 2023, PLAINTIFF sent a letter to
22 DEFENDANT OCBA Board and President that since PLAINTIFF didn't provide a check with her
23 application PLAINTIFF was in fact in a violation of DEFENDANT'S OCBA LRIS Rules. In
24 response, almost immediately, PLAINTIFF received letters from Business Litigation and
25 Immigration Law Panels that her membership applications are incomplete. When responding to
26 PLAINTIFF these panels took away all PLAINTIFF'S international experience from her
27 applications and sent them back to her. In response, PLAINTIFF sent an email to DEFENDANT
28 OCBA that taking away PLAINTIFF'S international experience from the applications and sending
them back is discriminatory, and in any case PLAINTIFF'S credentials, especially CLEs earned by
the PLAINTIFF for Business Litigation and Immigration Law qualify her for those panels even

1 without going into her international credentials. At the same time PLAINTIFF requested for final
2 decisions of the panels in accordance with OCBA LRIS rules, so that she can file for an appeal if
3 necessary.

4 111. On or around February 14, 2023, PLAINTIFF received a letter from
5 DEFENDANT OCBA LRIS that she was accepted to OCBA LRIS' Business & Corporate panel,
6 but she was denied in joining to Business Litigation, intellectual Property and Immigration Law
7 panels, because PLAINTIFF does not satisfy minimum requirements for those panels. At the same
8 time letter had no information on how PLAINTIFF does not satisfy those minimum requirements.
9 As it became apparent later the DEFENDANT OCBA accepted PLAINTIFF's candidacy to
10 Business & Corporate Panel only to defraud her, and make sure that she gets no case at all out of
11 around 12 referrals which were sent to her within 1 year of her membership (one per month).

12 112. On or around February 17, 2023, PLAINTIFF received first referral for
13 Business & Corporate Panel during almost 5 weeks of her membership. When PLAINTIFF asked a
14 question why she is getting 1 referral per month, as she does not believe that the number of
15 Business & Corporate cases in the Orange County are so limited, the response was very standard
16 'the call volumes in community differ and they can't guarantee any number of referrals in a given
17 period of time', which PLAINTIFF believes based first of all on DEFENDANT OCBA'S audit
18 reports, is untrue. DEFENDANT OCBA actually contradicted itself, because it sent PLAINTIFF
19 exactly one referral per month, while it asserted that "the call volumes in community differ", and all
20 those referrals ended up with returning no real case to the PLAINTIFF, moreover, majority of the
21 applicants were verbally and emotionally abusive and clearly didn't have any intent to retain her.

22 113. On or around March 21, 2023, PLAINTIFF sent a complaint about her
23 experience with DEFENDANTS OCBA and OCBA LRIS to the State Bar of California, asking
24 them to fix the problem. Immediately after she applied to the State Bar of California with this
25 complaint she received a notice from California Franchise Tax Board, stating that they have
26 information that she got her license in 2020 but she didn't pay taxes for 2020. PLAINTIFF felt
27 confused and outraged at this fact, because PLAINTIFF was absent from the United States for the
28 whole period of 2020 and came to the U.S. only to get her license and stayed in the country for a
very short period of time, and PLAINTIFF didn't work in 2020. PLAINTIFF believes that the letter
she received back in March, 2023, from Franchise Tax Board was not accidental.

1 114. On or around May 30, 2023, State Bar of California responded to the
2 PLAINTIFF'S complaint that they found no violation, that there were 25 Corporate & Business
3 panel members, and at the time of PLAINTIFF'S complaint there were 14 panel members who had
4 not yet received the referrals, and that between February 14, 2023 and March 21, 2023,
5 DEFENDANT OCBA LRIS got only 11 referrals. These findings of the State Bar of California
6 clearly contradicts audit reports and admission of the DEFENDANT OCBA itself. Thus, audit
7 report of DEFENDANT OCBA for 2022 states that the total revenue for 2022 of this organization
8 was \$ 2,916,840, the revenue coming from OCBA LRIS was \$ 465,673, and this is considering the
9 fact that it was two years after pandemic, and that for 2023 DEFENDANT OCBA'S revenue was
10 for sure more than for the year of 2022, and considering the fact that DEFENDANT OCBA LRIS
11 takes only 15 to 20 % out of the general earnings of the attorneys for each case ! This actually
12 means, that DEFENDANTS OCBA and OCBA LRIS had enough cases both in 2022 and 2023, and
13 their assertion that they didn't have enough cases to share with the PLAINTIFF is false. Moreover,
14 PLAINTIFF requested all financial statements of the DEFENDANTS OCBA AND OCBA LRIS
15 concerning the revenue organization got from each panel but was given the answer that they do not
16 have this information, which PLAINTIFF believes can't be true.

16 115. PLAINTIFF was subjected to the continuous harassment throughout her
17 membership with DEFENDANT OCBA LRIS. Her electronic entrance to the system was blocked
18 several times without any apparent reason, people referred to her were verbally and emotionally
19 abusive and generally didn't have any desire to form any attorney-client relationship with her, out of
20 roughly 12 referrals she got for the entire year she got no real client. On top of that, PLAINTIFF
21 upon information and facts believes that DEFENDANT OCBA and OCBA LRIS employees
22 continued harassing her through other referral organizations, where she was a member, she believes
23 that they reached to DEFENDANT LACBA, and later DEFENDANT ASN and conspired with
24 DEFENDANTS LACBA and ASN to damage her business. On or around November 15, 2023,
25 DEFENDANT OCBA LRIS employee Teresa Vuki sent PLAINTIFF an email that till that day
26 (November 15, 2023) LRIS referrals have generated over \$2.3 million in attorney fees. At this time
27 DEFENDANT OCBA LRIS was clearly aware that PLAINTIFF generated no revenue through the
28 referrals she received from them, and this email was sent to harass and frustrate her. In the same

1 email PLAINTIFF was asked to renew her membership and pay membership fees for the next 2024
2 year, which sounded like a joke.

3 116. In one of her emails PLAINTIFF sent to DEFENDANT OCBA LRIS after
4 her application was rejected for Intellectual Property panel, PLAINTIFF expressed her general
5 frustration with the decision and responded that she believes that she “has more experience in IP
6 and more qualified for this panel than any other member of it, for exception of probably Patent
7 Law”. Since that time PLAINTIFF was haunted with the referrals for Patent filings in other referral
8 organizations, even though she has never been a member of IP panel in those organizations, and
9 PLAINTIFF believes that other referral organizations acted in conspiracy with DEFENDANT
10 OCBA and OCBA LRIS to harass and intimidate her by sending her referrals she didn’t ask for and
11 didn’t expect. This was also obviously done by committing multiple wire fraud to leave
12 PLAINTIFF with no business, or significantly lower her chances to get valuable business out of the
13 referrals, which were sent to her.

14 117. On or around November, 2022, PLAINTIFF joined DEFENDANT LACBA
15 SLRS. PLAINTIFF became a member of Business Litigation and Immigration Law panels. Upon
16 PLAINTIFF’S joining to the DEFENDANT LACBA SLRS, DEFENDANT LACBA SLRS with
17 intent to defraud charged PLAINTIFF’S credit card twice. Later PLAINTIFF also discovered that
18 DEFENDANT’S system was not set up properly to send her emails about referrals. After
19 PLAINTIFF’S complaints this situation was cured.

20 118. Since the time PLAINTIFF joined the DEFENDANT LACBA SLRS,
21 DEFENDANT LACBA SLRS with intent to defraud and contrary to the State Bar’s Rules for
22 referral services using wire started sending to PLAINTIFF referrals not in the area of practice of
23 PLAINTIFF, for the people already represented, or for the clients speaking the languages
24 PLAINTIFF didn’t speak, or continuously asking for pro-bono services. Besides, PLAINTIFF based
25 on information and facts believes that DEFENDANT LACBA SLRS with intent to defraud and
26 using wire was sending her fake Business Litigation referrals. It is necessary to mention that earlier
27 PLAINTIFF was rejected in her request to join Business Litigation panel at DEFENDANT OCBA.

28 119. On or around February 8, 2023, PLAINTIFF sent a complaint to Seth
Chavez, who was a Director of Operations at DEFENDANT LACBA about her experience with
referrals. However, nothing has changed since the time of her complaint and PLAINTIFF continued

1 getting harassed by inadequate referrals. Besides her complaint to DEFENDANT Seth Chavez,
2 PLAINTIFF made a lot of complaints to Luis Ramirez, who was an Administrative assistant at
3 DEFENDANT LACBA SLRS with no positive result as well.

4 120. On or around May 23, 2023, PLAINTIFF received a referral for Patent filing,
5 though PLAINTIFF has never been a member of IP Panel. PLAINTIFF's questions to
6 DEFENDANT Seth Chavez about why she is getting referrals for the panel she is not a member of
7 was explained that their intake does not always "capture every details".

8 121. After PLAINTIFF made her complaints to DEFENDANT LACBA she
9 started getting referrals for Armenian clients. PLAINTIFF informed DEFENDANT LACBA that
10 she got a lot of threats from this community and she is scared to represent them. Immediately
11 afterwards DEFENDANT LACBA remembered that there are rules of the State Bar of California
12 and they have to follow them, before that for this DEFENDANT it was absolutely ok to send
13 PLAINTIFF referrals not in her area of practice, clients speaking the languages she does not speak,
14 fake referrals, pro-bono referrals, already represented clients and etc.

15 122. On or around June 22, 2023, PLAINTIFF received an email from
16 DEFENDANT LACBA SLRS that their advisory committee had a meeting concerning
17 PLAINTIFF'S request not to send her referrals for Armenians, and decided that she has to either opt
18 out from the online referrals or get suspended. It is interesting that Advisory Committee of the
19 DEFENDANT LACBA SLRS decided that they can "suspend" PLAINTIFF without State Bar of
20 California's investigation into the matter and without court's decision. PLAINTIFF suffered shock
21 as a result of getting such decision, while none of her prior concerns were properly addressed by
22 this DEFENDANT, and DEFENDANT was absolutely ok violating State Bar rules.

23 123. After PLAINTIFF decided to opt out from online referrals, the number of
24 the referrals she got from DEFENDANT LACBA significantly decreased. DEFENDANT
25 LACBA'S explanation on PLAINTIFF'S requests about what happened to the number of referrals
26 and why after she chose to opt them out she got only one referral were explained by "low rotation in
27 immigration and business litigation panels".

28 124. At the same time PLAINTIFF was experiencing problems with getting her
CLE certificates from DEFENDANT LACBA. At the beginning she had to write and call several
times to DEFENDANT LACBA, an only after several calls and emails she could get her CLE

1 certificate, but later all her calls and emails were ignored. PLAINTIFF chose avoiding
2 DEFENDANT LACBA'S CLE trainings as getting certificates became a significant problem for
3 her.

4 125. In August 8, 2023, one of PLAINTIFF's client referred by DEFENDANT
5 LACBA SLRS informed her that she wants to close her case. Almost immediately afterwards
6 PLAINTIFF received an email from DEFENDANT LACBA SLRS that they got information that
7 one of her clients has reported additional fees and in fact blamed the PLAINTIFF in not paying the
8 referral fee. On or around August 31, 2023, PLAINTIFF repeatedly sent emails to DEFENDANT
9 LACBA SLRS that she continues not getting cases from them, and the last case she got from them
10 was 2-3 months ago, she also asked to remove all restrictions from her account and to add her back
11 to the web referral system.

12 126. DEFENDANT LACBA SLRS immediately asked for the closing documents
13 and placed a hold on PLAINTIFF's referral account, it also asked for all fees to be remitted
14 immediately. On or around September 6, 2023, PLAINTIFF sent an email to DEFENDANT
15 LACBA SLRS asking questions why her account was suspended and why she is required to give
16 closing documents immediately after she closed her case, while according to the rules of
17 DEFENDANT LACBA SLRS she had 60 days to report the closing documents after the case was
18 closed. Also, PLAINTIFF requested to explain why contrary to DEFENDANT LACBA SLRS
19 Rules she was required to pay the referral fees immediately, while she had 31 days under the Rules
20 to do so. PLAINTIFF was sure at that moment that DEFENDANT LACBA SLRS became a part of
21 Armenian Enterprise in trying to harm and damage her business.

22 127. On or around September 26, 2023, after not getting the referrals from
23 LACBA SLRS despite the fact of how DEFENDANT LACBA SLRS asserted PLAINTIFF that
24 they removed all holds on her account, she wrote another email to DEFENDANT LACBA SLRS
25 requesting the answer. DEFENDANT LACBA SLRS's answer was that referrals are based "on
26 many factors" and provided on a "rotation basis", she also received a threat that they will relay the
27 issue to the Advisory Committee if PLAINTIFF continues asking questions. PLAINTIFF before the
28 incident was getting referrals regularly from DEFENDANT LACBA SLRS on a weekly basis.

29 128. On or around October 10, 2023, DEFENDANT LACBA SLRS sent
30 PLAINTIFF referral for the person, who later was fishing the PLAINTIFF to send her a fake check.

1 The “Client” refused to talk to her over the phone and wanted the contract from the PLAINTIFF
2 immediately. PLAINTIFF’s request addressed to the DEFENDANT LACBA SLRS about why she
3 is getting such referrals was that “web referrals are minimally screened”.

4 129. On or around February 13, 2023, PLAINTIFF became a member of
5 DEFENDANT ASN.

6 130. On or around October 6, 2023, DEFENDANT ASN sent her a referral for
7 someone who was looking for PATENT filing. As PLAINTIFF recalls it, a voice of the “client”,
8 who wanted the service was suspiciously similar to the voice of the person requesting for similar
9 services on a referral from DEFENDANT LACBA LRS sent to her on or around May 31, 2023.
10 PLAINTIFF was not a member of IP Panel.

11 131. For the period of September - October, 2023, PLAINTIFF was getting
12 referrals from DEFENDANT ASN, which were not in her area of practice, clients whose cases
13 demanded a lawsuit in another jurisdiction, or clients whose cases must be done by someone who
14 has a license in a different state, clients, whose cases would demand PLAINTIFF to travel to North
15 California and etc. Eventually, on or around October 6, 2023, PLAINTIFF requested DEFENDANT
16 ASN to remove her from Business Litigation panel and leave her only on Immigration Law panel
17 list.

18 132. On or around October 12, 2023, after PLAINTIFF raised the issue with
19 DEFENDANT ASN that she doesn’t want to receive referrals for the litigation cases in Northern
20 California, she received an email from DEFENDANT LACBA SLRS stating that “they have a new
21 keyword for the attorneys to take cases in Sacramento County area.” and if someone wants this
22 keyword to be added to their profile they can contact DEFENDANT LACBA SLRS.

23 133. On or around October 9, 2023, DEFENDANT ASN requested her to give
24 them her new address in San Diego. PLAINTIFF sent them her new address (PLAINTIFF was
25 temporary on that address). On the following day during a morning time PLAINTIFF heard unusual
26 noise coming from the doorway. Later she was shocked noticing a cockroach that moved from the
27 door right to the center of her apartment. The insect was however damaged (probably, while it was
28 placed under the door), because it didn’t live long and die shortly (in the same way as a rat she
previously found in her garage in Irvine). Comparing Azerbaijanis to cockroaches in the most
terrible racist way was very common for Armenians harassing PLAINTIFF in her Twitter account.

1 One of them even sent her a picture of the cockroach with the heading - Where are you, we are
2 coming... It was after PLAINTIFF moved away from her temporary apartment in San Diego.
3 Before the cockroach was found in one of the hotels where PLAINTIFF stayed for a short period of
4 time. It is necessary to notice that PLAINTIFF has never stayed in cheap or dirty hotels. Later
5 PLAINTIFF realized that the Executive Director of the DEFENDANT ASN is an Armenian.

6 134. Shortly after PLAINTIFF found a cockroach in her apartment, she discovered
7 her car in the garage of the same apartment with a flat tire. It was quite unusual, as the
8 PLAINTIFF'S car was new. PLAINTIFF was forced to call to the service to come and to take care
9 about her car, so that she can move it from the garage to the tire shop, and for this reason she
10 incurred expenses.

11 135. On or around October 24, 2023, PLAINTIFF sent another email to
12 DEFENDANT ASN that she still continues getting referrals for the business litigation while she
13 requested to remove her from this panel.

14 136. On or around December 6, 2023, DEFENDANT ASN sent PLAINTIFF
15 another referral requiring representation in another state. At this stage PLAINTIFF realized that
16 DEFENDANT ASN was desperately trying to catch PLAINTIFF on malpractice. PLAINTIFF sent
17 an email to DEFENDANT JAKE BALOIAN as to why she got the referral requiring a lawyer in
18 another jurisdiction, on which she received an answer that "they were not sure about the jurisdiction
19 and wanted to give PLAINTIFF the chance to decide it", which sounded like a joke.

20 137. In January, 2024, DEFENDANT ASN sent a referral to the PLAINTIFF,
21 where "client" actually wanted her to do the illegal transaction and later come to underground
22 garage. PLAINTIFF, shocked and disgusted, refused.

23 138. In May, 2024, PLAINTIFF paid DEFENDANT MARTINDALE - NOLO to
24 get leads. Shortly after PLAINTIFF paid for the leads on or around May 25, 2024, she got a referral
25 from the DEFENDANT MARTINDALE - NOLO, from someone concealing his real name and
26 surname that he is looking for a lawyer, because he is concerned about Intellectual Property. Phone
27 number left by the "client" was fake and unreachable, PLAINTIFF sent an email to the "client", and
28 "client" in the email confirmed that he is a looking for a Patent lawyer. PLAINTIFF believes that it
was another sign sent to her that the enterprise formed against her is not going to provide her with
the real leads. Shortly, thereafter PLAINTIFF mailbox was flooded with fake leads, unresponsive

1 phone numbers, people lying that they do not speak English (while they perfectly could), people
2 requesting the contracts, but never even opening them, people promising to consider working with
3 the PLAINTIFF but constantly keeping her on hold, people emotionally abusive and etc.

4 139. On or around June 3, 2024, PLAINTIFF sent an mail to the DEFENDANT
5 MARTINDALE-NOLO that she is getting strange business leads, on which her account manager
6 agreed to replace them upon her complaint. However, the replaced leads were of no better quality.
7 PLAINTIFF asked DEFENDANT MARTINDALE - NOLO to stop sending her any leads and to
8 refund back her money, however DEFENDANT MARTINDALE-NOLO with intent to defraud
9 refused from doing so and continued using wire sending to the PLAINTIFF fake leads with the
10 purpose to ensure that she does not get a single client who will pay her.

11 140. On or around May 28, 2024, PLAINTIFF signed up for the referral services
12 of DEFENDANT LEGAL MATCH. Shortly after she signed up for the services she received an
13 email from her account manager about her LEGAL MATCH profile. When PLAINTIFF opened
14 her profile she found out that DEFENDANT LEGAL MATCH showed as her address the address in
15 Rancho Cucamonga. PLAINTIFF has never requested DEFENDANT LEGAL MATCH to put into
16 her profile any Rancho Cucamonga address, her communications with Estrella Sanchez, her account
17 manager suggest that PLAINTIFF informed her that her business is in San Diego. Only afterwards
18 PLAINTIFF realized that it was a sign left by the Armenian Enterprise - when back in January
19 2024, after DEFENDANT ANCA and ANCAWR made defamatory statements about her in the
20 social media, her phone number and mail addresses were flooded with threats, some or the threats
21 suggested that her real address is well known. Afterwards, PLAINTIFF discovered numerous links
22 in Google Search under her name to her previous addresses, including the address in Rancho
23 Cucamonga. The question was why DEFENDANT LEGAL MATCH decided to use a wrong
24 address if it was provided with the PLAINTIFF's real address ? Shortly after PLAINTIFF's request
25 the address in the system has been changed, but Google Search under her name still associated with
26 Rancho Cucamonga for LEGAL MATCH profile. PLAINTIFF also believes that it was done to
27 confuse PLAINTIFF's potential clients and give them an impression that PLAINTIFF's business
28 does not exist or the PLAINTIFF is a fraudster - another pattern very much exploited by
DEFENDANT ANCA and ANCAWR against their opponents.

1 141. DEFENDANT LEGAL MATCH with intent to defraud was continuously
2 sending her fake referrals, referrals where phone numbers were unreachable, referrals for the clients
3 who didn't speak the languages she spoke as well as referrals for the clients who pretended that they
4 couldn't speak English but they perfectly could, clients who asked for the contracts and kept her in a
5 hold position (PLAINTIFF believes to harass her and to take as much of her time as possible while
6 giving her hope), useless referrals, where she couldn't get any real client. PLAINTIFF sent
7 numerous complaints about the quality of the referrals she was getting from DEFENDANT LEGAL
8 MATCH to the account manager Estrella Sanchez with no avail. DEFENDANT LEGAL MATCH
9 continued sending PLAINTIFF useless referrals. PLAINTIFF also believes that many of them were
10 not from real clients but from the people specifically sent to harass, bully and defraud her.

11 142. On or around June 13, 2024, PLAINTIFF sent another email to
12 DEFENDANT LEGAL MATCH informing them that she does not handle cases of the people who
13 have been already deported and who committed multiple felonies (these were the main cases
14 PLAINTIFF continued receiving from DEFENDANT LEGAL MATCH despite her complaints),
15 and any such case after this warning will be counted by PLAINTIFF as harassment. DEFENDANT
16 LEGAL MATCH instead of curing the situation stopped sending PLAINTIFF any case at all. After
17 some interval DEFENDANT LEGAL MATCH with intent to defraud and using wire continued
18 sending to the PLAINTIFF fake referrals.

19 143. Several tweets, which were sent to PLAINTIFF, when DEFENDANTS
20 ANCA and ANCAWR continuously were harassing her with disbarment and placed defamatory
21 statements about PLAINTIFF in social media, announced that they achieved the goal to leave the
22 PLAINTIFF with no business in California, and they don't understand why she is still tweeting for
23 the likes. Other Armenian twitter accounts promised her that she will get evicted, she will not be
24 able to find the employment, that she will stay without money and advise her not to break
25 relationship with her own community as she will need their help very soon. Starting approximately
26 from last year PLANTIFF'S credit card companies under various excuses started lowering her
27 credit amounts, and the PLAINTIFF'S credit score went significantly down - PLAINTIFF believes
28 that it was done with the purpose to leave her without any money to pursue this lawsuit and make
her to leave the United States.

1 144. As a result of DEFENDANTS' actions PLAINTIFF suffers financially, she
2 does not get referrals from the companies, which are supposed to give them to her, attraction of the
3 clients via her social media accounts became difficult as DEFENDANT GOOGLE following orders
4 from Armenian Enterprise placed defamatory content with DEFENDANTS ANCA AND ANCAWR
5 statements all over the internet and made sure that those statements appear in Google Search under
6 her name, her complaints are completely ignored by DEFENDANT GOOGLE, her business for a
7 long time thanks to DEFENDANT GOOGLE'S efforts was confused with another, and generally all
8 DEFENDANTS in their joint efforts act as a big Armenian Enterprise to do everything to ruin her
9 life, her career and her income.

10 **FIRST CAUSE OF ACTION**

11 **RACKETEERING ACTIVITY IN VIOLATION OF SEC. 1962 (C) ET SEQ. OF THE**
12 **RACKETEER INFLUENCED AND CORRUPT ORGANIZATION ACT**
13 **(PLAINTIFF AGAINST ALL DEFENDANTS)**

14
15 145. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
16 fully set forth herein.

17 146. Racketeer Influenced and Corrupt Organization Act section 1962 (c)
18 provides:

19 It shall be unlawful for any person employed by or associated with
20 any enterprise engaged in, or the activities of which affect, interstate
21 or foreign commerce, to conduct or participate, directly or indirectly,
in the conduct of such enterprise's affairs through a pattern of
racketeering activity or collection of unlawful debt.

22 147. To recover under § 1962(c), a plaintiff must prove (1) conduct, (2) of an
23 enterprise, (3) through a pattern, (4) of racketeering activity (known as "predicate acts"), (5) causing
24 injury to the plaintiff's "business or property" by the conduct constituting the violation.

25 148. DEFENDANTS are enterprises, whose/which activities affect interstate and
26 foreign commerce.

27 149. DEFENDANTS, excluding DEFENDANTS ANCA, ANCAWR and
28 GOOGLE, were responsible for giving PLAINTIFF accurate and real referrals/leads, however

1 instead they did everything to take her money and damage her business by defrauding her, and thus
2 liable under Section 1343 of 18 U.S.C. for fraud by wire, radio or television, Section 1346 of 18
3 U.S.C. by engaging in a scheme to defraud the PLAINTIFF of the intangible right of honest
4 services, Section 1349 of 18 U.S.C. - attempt and conspiracy .

5 150. DEFENDANTS TERESA VUKI, JAKE BALOIAN, SETH CHAVEZ,
6 COCO SU, ESTRELLA SANCHEZ, TRUDY LEVINDOFSKE with the intent to defraud
7 participated directly or indirectly in the conduct of such enterprise's affairs through a pattern of
8 racketeering activity by sending her fake referrals, referrals to harass her, to leave her with no
9 business and generally to affect her business and income;

10 151. DEFENDANT ARAM HAMPARIAN, as an Executive Director for
11 DEFENDANT ANCA, was directly or indirectly involved in spreading false and defamatory
12 information to affect PLAINTIFF'S business and to leave her with no income, solicited or induced
13 others to send to the PLAINTIFF violent threats, conspired against PLAINTIFF'S Constitutional
14 Rights, placed or ordered to place PLAINTIFF under constant surveillance in order to intimidate or
15 kill/injure her, and therefore is liable under Section 1343 of 18 U.S.C. for fraud by wire, radio or
16 television, Section 1346 of 18 U.S.C. by engaging in a scheme to defraud the PLAINTIFF of the
17 intangible right of honest services, Section 1349 of 18 U.S.C. - attempt and conspiracy, Section 247
18 - Conspiracy against Rights, Section 2261A of 18 U.S.C. - Stalking; Section 1959 - Violent crimes
19 in aid of racketeering activity.

20 152. ARMEN SAHAKYAN, as an Executive Director for DEFENDANT
21 ANCAWR, was directly or indirectly involved in spreading false and defamatory information to
22 affect PLAINTIFF's business and to leave her with no income, solicited or induced others to send to
23 the PLAINTIFF violent threats, conspired against PLAINTIFF'S Constitutional Rights, placed or
24 ordered to place PLAINTIFF under constant surveillance in order to intimidate or kill/injure her,
25 and therefore is liable under Section 1343 of 18 U.S.C. for fraud by wire, radio or television,
26 Section 1346 of 18 U.S.C. by engaging in a scheme to defraud the PLAINTIFF of the intangible
27 right of honest services, Section 1349 of 18 U.S.C. - attempt and conspiracy, Section 247 -
28 Conspiracy against Rights, Section 2261A of 18 U.S.C. - Stalking; Section 1959 - Violent crimes in
aid of racketeering activity.

1 153. DEFENDANTS were engaged in multiple acts of racketeering activity by
2 committing wire and mail fraud, as it fully and in details described in General Allegations part of
3 the present Complaint, additionally DEFENDANTS ANCA and ANCAWR through its members
4 and/or leaders threatened to kill, rape and injure PLAINTIFF, placed her under total surveillance
5 and stalk all her residential and business addresses as well as her bank and credit card information
with the purpose to intimidate, threaten and damage her.

6 154. DEFENDANTS’ acts constitute a pattern of racketeering activity, as they
7 committed the similar acts before and they continue their commission towards the PLAINTIFF for
8 more than 1 year now.

9 155. DEFENDANTS’ acts are continuous and will continue unless it is stopped by
10 this Court.

11 156. PLAINTIFF is therefore entitled to the award of treble of damages against
12 the DEFENDANTS according to the RICO Statute and the proof to be determined by the trier of
13 fact but not for less than \$ 500, 000, 000, PLAINTIFF is also entitled to permanent injunction
14 against DEFENDANTS requiring them to stop their racketeering activity towards PLAINTIFF as
15 well as restraining orders against DEFENDANTS ARAM HAMPARIAN, ARMEN SAHAKYAN
16 and their other members as will be identified by further investigation.

17
18 **SECOND CAUSE OF ACTION**
19 **CONTROL OF THE ENTERPRISE IN VIOLATION OF SEC. 1962 (B) ET SEQ. OF THE**
20 **RACKETEER INFLUENCED AND CORRUPT ORGANIZATION ACT**
21 **(PLAINTIFF AGAINST ALL DEFENDANTS)**

22
23
24 157. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
25 fully set forth herein.

26 158. Racketeer Influenced and Corrupt Organization Act section 1962 (b)
27 provides:

28 It shall be unlawful for any person through a pattern of racketeering
activity or through collection of an unlawful debt to acquire or

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maintain, directly or indirectly, any interest in or control of any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.

159. DEFENDANTS ARAM HAMPARIAN, ARMEN SAHAKYAN, JEREMY STOPPELMAN, TRUDY LEVINDOFSKE, THERESA VUKI, SETH CHAVEZ, COCO SU, JAKE BALOIAN, ESTRELLA SANCHEZ are in the control of the enterprise through a pattern of racketeering activity.

160. DEFENDANTS JEREMY STOPPELMAN, TRUDY LEVINDOFSKE, THERESA VUKI, SETH CHAVEZ, COCO SU, JAKE BALOIAN, ESTRELLA SANCHEZ and enterprises they managed were responsible for fair distribution of the referrals they've received, and they did it with commission of multiple acts of wire & mail fraud.

161. DEFENDANTS TRUDY LEVINDOFSKE and THERESA VUKI are in the control of the enterprise openly violating antitrust laws. They operate and run an enterprise set up to monopolize the business in the hands of big law corporations with exclusion of lawyers from other counties, with open discrimination towards small law firms and solo practitioners, with the approval system clearly aimed to defraud solo practitioners like PLAINTIFF by taking their membership fees and leaving them without business.

162. Additionally, the fact that Armenian Enterprise working for DEFENDANTS or paying to DEFENDANTS any membership fee has close ties with terrorist organizations and /or terror groups and almost for sure sponsor and finance them need thorough investigation, if true - this means that the entire legal system is in violation of the RICO statute by triggering many of its sections for sponsoring terrorism, wire & mail fraud, conspiracy and etc.

163. DEFENDANTS ARAM HAMPARIAN, ARMEN SAHAKYAN are responsible for managing and control of DEFENDANT ANCA AND ANCAWR, through which by using wire with intent to defraud they made defamatory statements about PLAINTIFF, placed or ordered Armenian Enterprise to place false and defamatory content under PLAINTIFF'S name in Google Search so that to damage her business and reputation, and generally acted with malicious intent to harass the PLAINTIFF as it is described in more details in General Allegations part of the present complaint.

164. DEFENDANTS ANCA and ANCAWR are directly or indirectly regulated or have close connections with Armenian Revolutionary Federation - an accepted terror organization,

1 and the matter of their financing raises certain questions. Reports also suggest that DEFENDANTS
2 ANCA and ANCAWR have close ties with other Armenian terror groups and regularly support
3 violent acts (as one, which happened back in July 2020 near LA Azerbaijani consulate) and
4 generally sponsor and support terrorists in their release from jails.

5 165. DEFENDANTS' actions caused significant loss to the PLAINTIFF, her
6 business does not get referrals, her social media attempts are cut off by defamatory content placed
7 there about the PLAINTIFF by the DEFENDANTS.

8 166. PLAINTIFF is therefore entitled to the award of treble of damages against
9 the DEFENDANTS according to RICO STATUTE and the proof to be determined by the trier of
10 fact, PLAINTIFF is also entitled to permanent injunction against DEFENDANTS requiring them to
11 stop their racketeering activity towards PLAINTIFF.

12 **THIRD CAUSE OF ACTION**

13 **CONSPIRACY IN VIOLATION OF SECTION 1962 (D) ET SEQ. OF THE RACKETEER**
14 **INFLUENCED AND CORRUPT ORGANIZATIONS ACT**
15 **(PLAINTIFF AGAINST ALL DEFENDANTS)**

16 167. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
17 fully set forth herein.

18 168. Racketeer Influenced and Corrupt Organization Act section 1962 (b)
19 provides:

20 It shall be unlawful for any person to conspire to violate any of the
21 provisions of subsection (a), (b), or (c) of this section.

22 169. As pattern of the racketeering activity outlined in General Allegations part of
23 the present complaint suggests DEFENDANTS conspired with each other to damage PLAINTIFF's
24 business.

25 170. DEFENDANTS used the similar or pretty similar methods by committing
26 multiple wire fraud to send to the PLAINTIFF fake referrals, referrals not in her area of practice,
27 referrals for the people, whose cases must be considered in another jurisdiction, or even tried to
28 engage her into criminal activity with malicious intent to destroy her reputation and career.

1 171. PLAINTIFF's attempt to change one referral organization to another, or even
2 buy leads didn't give any result, because she faced absolutely same problems in other referral
3 organizations, acting under the same pattern to defraud her and leave her with no business.

4 172. As facts and circumstances outlined in General Allegations part of the present
5 complaint suggest DEFENDANTS treated the PLAINTIFF in the similar way as Armenian
6 Enterprise treated her, using pretty much similar methods and tactics.

7 173. As a result PLAINTIFF suffered serious financial losses, which PLAINTIFF
8 asks to compensate her in the treble amount according to RICO and other applicable Laws and
9 Statutes in the amount to be determined by the trier of fact. PLAINTIFF is also entitled to
10 permanent injunction against DEFENDANTS requiring them to stop their racketeering activity
11 towards PLAINTIFF.

12 **FOURTH CAUSE OF ACTION**

13 **CONSPIRACY IN RESTRAINT OF TRADE OR COMMERCE IN VIOLATION OF**

14 **SECTION 1 ET SEQ. OF THE SHERMAN & CLAYTON ACT 15 U.S.C.**

15 **(PLAINTIFF AGAINST ALL DEFENDANTS)**

16 174. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
17 fully set forth herein.

18 175. Sherman Act, codified as *Title 15 of the United States Code*, prohibits "every
19 contract, combination, or conspiracy in restraint of trade," and any "monopolization, attempted
20 monopolization, or conspiracy or combination to monopolize."

21 176. Section 7 of the Clayton Act, codified as *Title 15 of the United States Code*,
22 prohibits mergers and acquisitions where the effect "may be substantially to lessen competition, or
23 to tend to create a monopoly." Clayton Act also bans certain discriminatory prices, services, and
24 allowances in dealings between merchants.

25 177. DEFENDANTS OCBA and OCBA LRIS violated Sherman & Clayton Act
26 by establishing the rules requiring the lawyers to have Orange County residence or to have a main
27 business office in the Orange County to become a member of the referral service. Rules established
28 by these DEFENDANTS monopolize the legal market in the hands of the Orange County lawyers

1 by restricting the lawyers from other counties to have access to the market. Besides,
2 DEFENDANTS' RULES favor big businesses and discriminate against solo practitioners and small
3 law firms by restricting their access to the market, and thus promote inequality in the legal
4 profession.

5 178. Conspiracy among DEFENDANTS to exclude PLAINTIFF from the market
6 is clearly a restraint on trade. Excluding PLAINTIFF from the market, and giving the referrals she
7 had to receive to other businesses contradict the spirit of the Sherman & Clayton Act, restraint the
8 trade and affects interstate commerce.

9 179. DEFENDANTS' actions caused significant damage to the PLAINTIFF'S
10 business and shall be compensated according to this Act in the amount of the treble of the
11 PLAINTIFF'S damages, but not for the less than \$ 500, 000, 000.

12 **FIFTH CAUSE OF ACTION**

13 **DENIAL OF PUBLIC ACCOMMODATION IN VIOLATION OF SECTION 2000A ET SEQ.**
14 **OF CIVIL RIGHTS ACT 42 U.S.C.**

15 **(PLAINTIFF AGAINST ALL DEFENDANTS EXCEPT DEFENDANTS ANCA AND**
16 **ANCAWR)**

17 180. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
18 fully set forth herein.

19 181. Section 2000a of Civil Rights Act, *codified under Title 42* of the Unites States
20 Code provides:

21 All persons shall be entitled to the full and equal enjoyment
22 of the goods, services, facilities, privileges, advantages, and
23 accommodations of any place of public accommodation, as
24 defined in this section, without discrimination or segregation
25 on the ground of race, color, religion, or national origin.

26 182. Section 2000b of Civil Rights Act, *codified under Title 42* of the United
27 States Code defines the places of public accommodation as "establishments affecting interstate
28 commerce or supported in their activities by the State action as places of public accommodation;

1 lodgings; facilities principally engaged in selling food for consumption on the premisesother
2 covered establishments. ”

3 183. All DEFENDANTS, except DEFENDANT ANCA and ANCAWR, were the
4 places of the public accommodation or employees of the places of public accommodation
5 responsible to accommodate PLAINTIFF accordingly, but they failed to do so.

6 184. All DEFENDANTS’ activity affect interstate commerce, all DEFENDANTS,
7 except DEFENDANTS ANCA and ANCAWR, are open to public, specifically DEFENDANT
8 GOOGLE AND YELP are open to the businesses to register and get reviews from their clients in
9 order to let the public to chose the best businesses. DEFENDANTS OCBA, OCBA LRIS, LACBA,
10 LACBA LRS, ASN, MARTINDALE - NOLO, LEGAL MATCH are open to the lawyers to provide
11 them with the referrals/leads if they satisfy certain standards.

12 185. Moreover, DEFENDANTS OCBA LRIS, LACBA SLRS, ASN, LEGAL
13 MATCH are certified by the State Bar of California as referral services, and as such they have to
14 follow State Bar standards. If DEFENDANTS OCBA LRIS, LACBA SLRS, ASN, LEGAL
15 MATCH discriminate against particular lawyer their act constitute or may constitute under certain
16 circumstances a state act.

17 186. DEFENDANTS OCBA and LACBA as non-profit organizations get state and
18 may be even federal funds, and any discrimination by those agencies may under certain
19 circumstances count as discrimination by the state or even by the federal government.

20 187. DEFENDANTS instead off acting as a place of public accommodation open
21 to all California licensed lawyers, acted as a private club, because they became arms and ears of the
22 DEFENDANTS ANCA and ANCAWR. DEFENDANTS joined DEFENDANTS ANCA and
23 ANCAWR in their persecution of the PLAINTIFF because of her ethnicity, national origin,
24 religion, political views and etc.

25 188. DEFENDANTS were so consumed in going after the PLAINTIFF on the
26 orders of the Armenian Enterprise that they forgot that by doing so, they actually lose their public
27 status and turn into a private club.

28 189. PLAINTIFF as it was indicated above is from Azerbaijan, which has a
longstanding conflict with Armenia.

1 190. In 1992-1995 Armenia with Russia's help occupied 20 % of PLAINTIFF'S
2 homeland, which resulted in heavy casualties, multiple acts of genocide committed by Armenian
3 terror groups, around 1 million refugees.

4 191. Azerbaijani witnesses who lived in Karabakh confirm that long before the
5 conflict started Armenian leadership of Karabakh fired them from all key positions or was offering
6 them low pay and dirty jobs. They also confirm that they were getting a lot of threats, and some of
7 them were even beaten and asked to leave their homes immediately.

8 192. Armenia's official ideology is built on Tsegakron, the nationalistic (fascist)
9 ideology established by former Nazi collaborator G. Njdeh, whose enormous monuments are
10 erected everywhere in Armenia. Thanks to this ideology many Armenians are intolerant to other
11 nations or even to Armenians from other regions/countries.

12 193. Albert Isakov, a blogger, who is half Armenian and Jewish, talks on his
13 Youtube channel how horribly he was treated in Armenia after he left Azerbaijan for being not a full
14 blood Armenian, and because he didn't speak Armenian.

15 194. As it was indicated above DEFENDANTS ANCA and ANCAWR represent
16 interests of the most radical Armenians and their persecution of the PLAINTIFF is dictated by their
17 agenda, and PLAINTIFF is sure that in order to reach this agenda they are capable not only to
18 deprive her the business. PLAINTIFF'S own great grand dad was killed by dashnaks back in 1918
19 in Baku.

20 195. One of the reason why Armenian Enterprise was not sued till this day for
21 their outrageous acts of discrimination, stalking and persecution is that many are afraid of the
22 consequences. As one lawyer explained to the PLAINTIFF - "because they bomb people".

23 196. PLAINTIFF believes that it is unacceptable to allow a certain group of
24 people to act as they are the God, the Law and the Constitution in this country, this outrageous
25 behavior must be stopped.

26 197. Since DEFENDANTS acted together with DEFENDANTS ANCA and
27 ANCAWR in persecuting PLAINTIFF, they are in the similar way liable for discrimination against
28 the PLAINTIFF.

SIXTH CAUSE OF ACTION

**PROHIBITED RESTRAINTS ON COMPETITION IN VIOLATION OF SECTION 16720
ET SEQ. OF CALIFORNIA BUSINESS & PROFESSIONAL CODE
(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

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5 198. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
6 fully set forth herein.

7 199. Section 16721(a) of the California Business & Professional Code prohibits
8 exclusion of the person “from business transaction on the basis of a policy expressed in any
9 document or writing and imposed by a third party where that policy requires discrimination against
10 that person on the basis of any characteristics listed or defined in subdivision (b) or (e) of Section
11 51 of the Civil Code or on the basis that the person conducts or has conducted business in a
12 particular location. ”

13 200. Section 16721 (b) of the California Business & Professional Code states that
14 “No person with the jurisdiction of this State shall require another person to be excluded, or be
15 required to exclude another person, from a business transaction on the basis of the policy expressed
16 in any document or writing that requires discrimination that other person...”

17 201. Section 16721 (c) of the California Business & Professional Code declares
18 that any violation of any of provision of this Section is a conspiracy against trade.

19 202. Section 16727 of the California Business & Professional Code prohibits any
20 contract or price fixture where the effect of this will be “to lessen the competition or tend to create
21 the monopoly...”

22 203. Section 5.1. of DEFENDANT OCBA’S Lawyer Referral & Information
23 Service Rules requires an attorneys in order to become a member of the service either to be a
24 resident of OCBA or have their main business office in Orange County. It also requires the business
25 to have a telephone number starting with Orange County area code. Further the same Section of the
26 Rules requires anybody working from home to disclose this fact to the Service. This Section of the
27 Rules further states ‘If a member works from a home office, this fact shall be disclosed to the Client
28 by the Service. It is the responsibility of the member to provide professional services whether from
a business or home office. “

1 204. DEFENDANT OCBA’S Lawyer Referral & Information Service Rules
2 openly discriminative and is designed to monopolize the trade. Requiring the attorney to have his
3 main business office in Orange County, and further demanding from him that he has to have a
4 phone number with Orange County area code to join the Service is openly designed to restrict and
5 monopolize the trade.

6 205. Moreover, DEFENDANTS OCBA AND OCBA LRIS are openly favoring
7 large law firms and business owners, because their Rules openly declares that potential clients will
8 be discouraged to work with small law firms and solo practitioners. The ultimate result of this Rules
9 will be to promote inequality in the legal profession.

10 206. PLAINTIFF believes that Section 5.1 of OCBA Rules is a prohibited restraint
11 on competition and such it must be removed from the Rules to allow all attorneys equal access to
12 practice law.

13 207. All other DEFENDANTS violated Section 1672 et seq. of California
14 Business & Professional Code by conspiring against the PLAINTIFF to destroy her business and by
15 excluding her from normal flow of referrals or creating problems for the PLAINTIFF’S business
16 online.

17 **SEVENTH CAUSE OF ACTION**
18 **UNFAIR COMPETITION IN VIOLATION OF SECTION 17200 ET SEQ. OF CALIFORNIA**
19 **BUSINESS AND PROFESSIONAL CODE**
20 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

21 208. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
22 fully set forth herein.

23 209. Section 17200 et seq. of California Business and Professional Code defines
24 unfair competition as “any unlawful, unfair or fraudulent business act or practice and unfair,
25 deceptive, untrue or misleading advertising ...”

26 210. DEFENDANTS are engaged or control businesses, which are engaged in
27 unfair competition and fraudulent business practices. By conspiring with each other to destroy
28

1 PLAINTIFF’S business and by committing multiple acts of mail & wire fraud DEFENDANTS in
2 fact promote unfair competition.

3 211. DEFENDANTS OCBA, OCBA LRIS, LACBA, LACBA SLRS, ASN,
4 MARTINDALE-NOLO, LEGAL MATCH, YELP and individual DEFENDANTS working for these
5 companies by sending PLAINTIFF fake referrals, referrals in violation of the Rules of the State Bar
6 of California, their own rules and Terms & Conditions promoted and were engaged in unfair
7 competition.

8 **EIGHTH CAUSE OF ACTION**

9 **DENIAL OF PUBLIC ACCOMMODATION IN VIOLATION OF SECTION 51 ET SEQ. OF**
10 **CALIFORNIA CIVIL CODE (UNRUH CIVIL RIGHTS ACT)**
11 **(BY PLAINTIFF AGAINST ALL DEFENDANTS EXCEPT DEFENDANTS ANCA AND**
12 **ANCAWR)**

13
14 212. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
15 fully set forth herein.

16 213. Section 51(b) et seq. of California Civil Code (Unruh Civil Rights Act)
17 provides:

18 All persons within the jurisdiction of this state are free and equal,
19 and no matter what their sex, race, color, religion, ancestry, national
20 origin, disability, medical condition, genetic information, marital
21 status, sexual orientation, citizenship, primary language, or immigration
22 status are entitled to the full and equal accommodations,
23 advantages, facilities, privileges, or services in all business establishments
24 of every kind whatsoever.

25 214. PLAINTIFF was targeted by DEFENDANTS ANCA and ANCAWR because
26 of her sex, race, color, religion, ancestry, national origin, citizenship. In the similar way all other
27 DEFENDANTS targeted PLAINTIFF because of her sex, race, color, religion, ancestry, national
28 origin, citizenship as they joined DEFENDANTS ANCA and ANCAWR in persecuting PLAINTIFF
and her business, and used pretty much similar tactics and methods.

215. DEFENDANTS knew that PLAINTIFF was an immigrant from Azerbaijan,
DEFENDANTS LACBA and LACBA SLRS knew that PLAINTIFF is persecuted by Armenian

1 Enterprise, but chose to join to their efforts in damaging her business by deliberately sending her
2 fake and useless referrals with the intent to defraud and leave her with no business.

3 216. DEFENDANT YELP knew that PLAINTIFF was persecuted by Armenian
4 Enterprise because of her national origin and citizenship, but chose keeping fraudulent reviews on
5 its Platform despite her numerous complaints with the intent to defraud the public about
6 PLAINTIFF's personality and quality of her services and defame her in her business capacity.

7 217. DEFENDANT GOOGLE knew that PLAINTIFF was persecuted by
8 Armenian Enterprise but chose to join this Enterprise in damaging her business and reputation
9 despite her numerous complaints.

10 218. All DEFENDANTS violated Unruh Act and will have to remove all
11 inappropriate content from their Platforms and pay damages to the PLAINTIFF in the amount not
12 less than \$ 500, 000, 000 according to the proof by the trier of fact.

13 **NINTH CAUSE OF ACTION**

14 **HARASSMENT IN VIOLATION OF SECTION 527.6 OF THE CODE OF CIVIL**
15 **PROCEDURE**

16 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

17 219. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
18 fully set forth herein.

19 220. Section 527.6 (b) (3) of the Code of Civil Procedure defines harassment as
20 "unlawful violence, a credible threat of violence, or a knowing and willful course of conduct
21 directed at a specific person that seriously alarms, annoys, or harasses the person, and that serves no
22 legitimate purpose. The course of conduct must be that which would cause a reasonable person to
23 suffer substantial emotional distress, and must actually cause substantial emotional distress to the
24 petitioner."

25 221. DEFENDANTS ANCA and ANCAWR for about 2 months (January -
26 February, 2024) continuously in their social media accounts and via their different agents placed
27 defamatory content about the PLAINTIFF with the purpose to harass, intimidate and cause her
28 substantial emotional distress. DEFENDANTS ANCA and ANCAWR didn't even stop on that but

1 called for her disbarment in all those platforms, tagged different people, encouraged their
2 community to attack her.

3 222. After DEFENDANTS ANCA and ANCAWR harassed PLAINTIFF in her
4 Twitter account, PLAINTIFF's phone number, YELP business page, email addresses were flooded
5 with messages from the people she didn't know promising to kill her, to harm her, to evict her, to
6 rape her. PLAINTIFF'S phone number was ringing nonstop for about 2-3 months after the incident
7 from unidentified numbers calling her names, threatening violence on her, promising her death.

8 223. DEFENDANTS ANCA and ANCAWR didn't stop on that - they continued
9 harassing PLAINTIFF by placing or ordering the Armenian Enterprise working for DEFENDANT
10 GOOGLE to place their messages, tweets, instagram publications, other materials to appear under
11 her name in Google Search in order to damage her reputation, to deprive her the business and to
12 cause her substantial emotional distress.

13 224. PLAINTIFF upon information and facts believes that DEFENDANTS ANCA
14 and ANCAWR continuously stalk her address, her business location, her bank information, her
15 social media accounts, and even her court cases in order to keep harassing and intimidating her.

16 225. PLAINTIFF is sure that the amount of the harassment PLAINTIFF endures
17 in this State from DEFENDANTS ANCA and ANCAWR entitles her to the protection not only
18 under civil harassment, but also under criminal harassment laws of the State of California.

19 226. PLAINTIFF believes that the evidence she has entitles her to get a restraining
20 order against DEFENDANTS ANCA; ANCAWR, their executive directors ARAM HAMPARIAN
21 and ARMEN SAHAKYAN, their respective members in order to stop them from stalking and
22 harassing her.

23 227. All other DEFENDANTS were engaged in the similar course of harassment
24 by sending her referrals she continuously asked not to send her, sending her the referrals not in the
25 area of her practice, illegally and discriminatively suspending her membership while she was an
26 active member of the Bar.

27 228. PLAINTIFF believes that a permanent injunction shall be issue with regards
28 to all other DEFENDANTS requiring them to send to the PLAINTIFF referrals in the regular course
of business and in accordance with the Rules of the State Bar of California.

TENTH CAUSE OF ACTION

DEFAMATION

**(BY PLAINTIFF AGAINST DEFENDANTS ANCA, ANCAWR, YELP, GOOGLE, DOES
1-300)**

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5 229. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
6 fully set forth herein.

7 230. DEFENDANTS ANCA and ANCAWR for about two months (January -
8 February, 2024) made multiple false statements in their instagram and other accounts as well as
9 through their agents about the PLAINTIFF that she called for the genocide of the Armenians in one
10 of her tweets. While doing so, DEFENDANTS ANCA and ANCAWR manipulated her tweet,
11 isolated it from all other her tweets, took it out of context and placed it under their news.

12 231. DEFENDANTS ANCA and ANCAWR targeted PLAINTIFF'S US license
13 and her business when they placed this information, tagged State Bar of California and demanded
14 her disbarment, thus DEFENDANTS ANCA and ANCAWR made a false statement about the
15 PLAINTIFF in her professional capacity.

16 232. Numerous statements made by DEFENDANTS ANCA and ANCAWR were
17 published to third parties, DEFENDANT ANCA and ANCAWR agents were disseminating the
18 same news all over the internet.

19 233. DEFENDANTS ANCA and ANCAWR also made sure that this information
20 appears under her name in Google Search results after nearly 2 months from the incident, therefore
21 DEFENDANT ANCA and ANCAWR had an intent to damage PLAINTIFF'S reputation in her
22 professional capacity and did it purposefully and maliciously.

23 234. DEFENDANTS ANCA and ANCAWR statements caused PLAINTIFF
24 significant emotional distress, shock, humiliation, and financial damage. PLAINTIFF was put in the
25 position to explain her tweet and to answer to many questions, besides of that she gets embarrassed
26 every time when her potential clients go to Google Search and find all defamatory content under her
27 name, and refuse or decline her services.

28 235. Moreover, DEFENDANTS ANCA and ANCAWR statements themselves
were a call for immediate attack and violence. DEFENDANTS ANCA and ANCAWR knew that

1 PLAINTIFF is a single lawyer from Azerbaijan living in the area heavily populated by Armenians
2 and that such statements may and will cause violent attack on her.

3 236. As a result of the horrible harassment after DEFENDANT ANCA and
4 ANCAWR statements PLAINTIFF suffered significant emotional distress, couldn't go out, was
5 concerned for her life and couldn't work, incurring significant financial losses.

6 237. DEFENDANT YELP allowed defamatory content to appear on
7 PLAINTIFF'S business profile knowing that it was shelled by multiple people at the same time and
8 many of them were not her clients.

9 238. DEFENDANT YELP was aware that according to its own rules they had to
10 remove any content coming from non-consumers, but continued keeping fake and damaging
11 reviews on its platform about PLAINTIFF'S business while deleting all positive ones coming from
12 the real clients of the PLAINTIFF.

13 239. DEFENDANT GOOGLE following instructions from Armenian Enterprise,
14 published and republished defamatory content about the PLAINTIFF multiple times and ensured
15 that they all come under her name in Google Search.

16 240. DEFENDANT GOOGLE refused to delete defamatory content about
17 PLAINTIFF from its platform despite numerous complaints of the PLAINTIFF.

18 241. ALL DEFENDANTS acted in conspiracy with each other to destroy and ruin
19 PLAINTIFF'S business and life by using illegal and outrageous criminal tactics.

20 242. Therefore, PLAINTIFF is entitled to damages for Defamation according to
21 the proof by the trier of fact.

22 **ELEVENTH CAUSE OF ACTION**

23 **MALICIOUS PROSECUTION**

24 **(BY PLAINTIFF AGAINST DEFENDANTS ANCA, ANCAWR AND DOES 1-300)**

25 243. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
26 fully set forth herein.

27 244. Armenian Enterprise targeted PLAINTIFF'S license in the State of California
28 multiple times by filing frivolous complaints against her in the State Bar of California, as in the

1 similar way they targeted other representatives of Azerbaijani and Turkic ethnicities by writing
2 multiple defamatory complaints to their working places to ensure that they are all get fired.

3 245. Writing and shelling someone’s work place or business pages with frivolous
4 complaints and defamatory letters is a well known pattern of Armenian Enterprise throughout the
5 globe. Many journalists, political activists, bloggers, even international organizations, politicians
6 have become a victim of such masterfully plotted smear campaigns, and the evidence is
7 overwhelming.

8 246. Both in 2023, and in 2024 people of the presumably Armenian descent
9 threatened PLAINTIFF that they will disbar her and wrote multiple frivolous complaints about her
10 to the Bar.

11 247. On or around February, 2024, DEFENDANT ANCA made another statement
12 in its account complaining that there is a “black day for the bar” as their complaint to the Bar on
13 PLAINTIFF got dismissed. DEFENDANT ANCA placed also the denied complaint first in its
14 account and then under PLAINTIFF’S name in Google Search.

15 248. After DEFENDANTS ANCA and ANCAWR couldn’t disbar PLAINTIFF
16 they engaged in unlawful, criminal tactics first to destroy her reputation, hoping that after achieving
17 this goal they will be able to deprive her the opportunity to practice the Law.

18 249. At the time when DEFENDANTS ANCA and ANCAWR made a complaint
19 on the PLAINTIFF to the Bar they knew that it was frivolous, their only purpose was to damage
20 PLAINTIFF’S reputation, to defame, to harass and intimidate her. Therefore, DEFENDANTS
21 ANCA and ANCAWR as well as other people making complaint on the PLAINTIFF to the BAR on
22 their order were maliciously prosecuting PLAINTIFF.

23 250. DEFENDANTS ANCA and ANCAWR shall compensate PLAINTIFF for all
24 emotional distress she endured as a result of such malicious prosecution, as well as monetary
25 damages in the amount to be set at trial.

26 **TWELFTH CAUSE OF ACTION**
27 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
28 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**

1 251. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
2 fully set forth herein.

3 252. DEFENDANTS ANCA and ANCAWR for about two months continuously
4 harassed PLAINTIFF with disbarment, they continuously placed defamatory content about the
5 PLAINTIFF in the social media in their own accounts in Twitter, in Instagram, in Facebook, in
6 Reddit. Various people were calling to her phone number with threats, someone called and informed
7 her that “We will not leave you in peace. We have placed all your information on Instagram with
8 thousands of subscribers - you became famous.” People were sending her death threats, her business
9 email for immigration services got spammed with thousands messages from different platforms to
10 which she didn’t subscribe and didn’t ask anyone to sign her up.

11 253. DEFENDANTS ANCA and ANCAWR didn’t stop on that - they made
12 statements publicly that PLAINTIFF’S actions constitute “moral turpitude” and therefore
13 PLAINTIFF must be disbarred, some Congressmen of the Armenian nationality joined to the
14 “disbar her” campaign.

15 254. DEFENDANTS ANCA and ANCAWR continued their outrageous conduct
16 when they or people on their order complained on her to the Bar, the complaint was placed in the
17 social media under the heading “Dark day for the State Bar of California” because our complaint
18 got dismissed.

19 255. PLAINTIFF as a result of such horrible conduct suffered enormous emotional
20 distress, was very scared for her life, was afraid to go out, couldn’t work for about three months,
21 and suffered significant financial losses, which she believes have to be compensated to her in the
22 amount set at the trial.

23 256. Other DEFENDANTS in the similar way didn’t provide her with referrals as
24 they had to do according to the Rules of the State Bar of California, intentionally were sending to
25 her fake leads, abusive clients with no intent to form with her any relationship, intentionally
26 harassed her with Patent filing cases while she wasn’t even a member of Intellectual Property Panel,
27 sent her referrals not in the area of her practice, tried to entangle her into illegal activity to damage
28 her reputation and to disbar her eventually, placed false information about her in social media,
allowed gang of the people to place fake reviews on her business page with full conspiracy with
those people, acting as a real organized criminal enterprise.

1 257. PLAINTIFF as a result of DEFENDANTS' outrageous conduct suffered
2 enormous stress and financial losses, which have to be compensated to her in the amount set at the
3 trial.

4 **THIRTEENTH CAUSE OF ACTION**
5 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**
6 **(BY PLAINTIFF AGAINST ALL DEFENDANTS)**
7

8 258. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
9 fully set forth herein.

10 259. At the time when DEFENDANTS ANCA and ANCAWR made defamatory
11 statements about PLAINTIFF they knew that it could impact their community and they can put
12 PLAINTIFF'S life in danger. Though PLAINTIFF believes that all people who harassed her with
13 rape, death, disbarment and etc, did that on the orders and with conspiracy with DEFENDANTS
14 ANCA and ANCAWR, she admits that some of them could approach her independently.

15 260. DEFENDANTS ANCA and ANCAWR owed the duty of care to the
16 reasonable person and could act with tact not to endanger the life and mental condition of the
17 PLAINTIFF, but they went forward with absolutely outrageous conduct of harassment for about two
18 months on a daily basis.

19 261. DEFENDANTS ANCA and ANCAWR breached their duty of care to the
20 PLAINTIFF, and subjected her to significant emotional distress, anxiety, shock and panic.
21 DEFENDANTS ANCA and ANCAWR are liable for damages to PLAINTIFF in the amount to be
22 set at trial.

23 262. All other DEFENDANTS in the similar way breached their duty of care
24 towards PLAINTIFF when kept sending her inadequate referrals, placed false and fake information
25 about her and her business on their online platforms, for months refused to correct the information
26 she wanted to be corrected in the internet and in terms of the referrals which were sent to her.

27 263. All other DEFENDANTS are liable for the damages caused to the Plaintiff in
28 the amount to be set at trial.

REQUEST FOR INVESTIGATION

1
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3 264. PLAINTIFF hereby incorporates by reference each and every paragraph, as if
4 fully set forth herein.

5 265. PLAINTIFF hereby requests for racketeering investigation by the Federal
6 Government through FBI, CIA and other relevant bodies.

7 266. PLAINTIFF based on the facts and information alleged in the present
8 Complaint as well as other evidence she has, believes that the magnitude of the conspiracy and
9 corruption in the legal profession is overwhelming.

10 267. PLAINTIFF upon information and facts believes that there are certain group
11 of attorneys, who work in a close cooperation with banks to launder the money. PLAINTIFF
12 received a fraudulent check from the attorney back in 2021, and thereafter despite her complaints no
13 charges were added to this attorney’s criminal case by San Diego DA and Police Department. In
14 October, 2023, DEFENDANT LACBA SLRS referred to the PLAINTIFF “client” fishing to send
15 her another fraudulent check. On or around December, 2023, DEFENDANT ASN with the intent to
16 defraud referred to the PLAINTIFF a person wanting to do an illegal transaction. All these suggest
17 that referral organizations are engaged in the pattern of racketeering activity as described under
18 Sections 1341 (mail fraud); 1343 (wire fraud); 1344 (financial institutions fraud); 1956 (Laundering
19 the monetary instruments), 1960 (Prohibition of unlicensed money transmitting businesses) and
20 others.

21 268. DEFENDANTS ANCA and ANCAWR do not even conceal the fact of their
22 close interactions with terrorist organizations, prior ATF and other investigations link these
23 organizations to terror groups. There are also certain concerns as to the sources of these
24 organization’s financing. Many of them suggest that they may have foreign financing, especially
25 from Russian government, which is currently under heavy sanctions. For more than one year
26 PLAINTIFF is persecuted by the group of people who are members of these organizations or hold
27 there key positions. PLAINTIFF gets death threats, rape threats, she is sure that her residential
28 address, business pages, bank and credit card information are under constant surveillance by this
Enterprise. DEFENDANT ANCA and ANCAWR, their members and employees are liable under
Section 1343 of 18 U.S.C. for fraud by wire, radio or television, Section 1346 of 18 U.S.C. by

1 engaging in a scheme to defraud the PLAINTIFF of the intangible right of honest services, Section
2 1349 of 18 U.S.C. - attempt and conspiracy, Section 247 - Conspiracy against Rights, Section
3 2261A of 18 U.S.C. - Stalking; Section 1959 - Violent crimes in aid of racketeering activity and
4 other applicable Sections.

5 269. PLAINTIFF upon information and facts believes that Armenian Enterprise
6 employed by DEFENDANTS and by the State Bar of California by using access to her confidential
7 files, to the referred clients, to her IOLTA and checking accounts, by managing/ or working for
8 those DEFENDANTS, by using illegal methods and connections does everything to ruin her
9 business, to harass her, to entangle her into crime, to stalk and threaten her. PLAINTIFF hereby
10 requests investigation in all those organizations under Section 1343 of 18 U.S.C. for fraud by wire,
11 radio or television, Section 1346 of 18 U.S.C. by engaging in a scheme to defraud the PLAINTIFF
12 of the intangible right of honest services, Section 1349 of 18 U.S.C. - attempt and conspiracy,
13 Section 247 - Conspiracy against Rights, Section 2261A of 18 U.S.C. - Stalking; Section 1959 -
14 Violent crimes in aid of racketeering activity and other applicable Sections.

15 In 2023, PLAINTIFF sent a complaint about her experience with the banks in California as well as
16 her experience with referral organizations (including strange fishing referrals). Complaints were
17 sent to FBI and Attorney General Office with no avail.

18 270. In 2023, PLAINTIFF also sent complaints to FBI regarding her experience
19 with cyber-security crimes of Armenian Enterprise, ongoing experience of horrible harassment and
20 smear campaigns. PLAINTIFF didn't get any answer on her complaint to this date.

21 271. Therefore, PLAINTIFF requests this Court to enter order requiring FBI and
22 U.S. Attorney General Office to conduct racketeering investigations of 1) all DEFENDANTS 2)
23 DEFENDANTS ANCA'S and ANCAWR'S ties to terror organizations; 3) DEFENDANTS ANCA'S
24 and ANCAWR'S financial sources; 3) DEFENDANT ANCA'S and ANCAWR'S ties, relationship,
25 cooperation and communications with all other DEFENDANTS against PLAINTIFF 4) relationship
26 between Armenian Enterprise employed by the State Bar of California and DEFENDANTS ANCA
27 and ANCAWR as well as their ties to terror organizations; 5) complaints against 700+ attorneys
28 identified by State Auditor in Report 2022 - 030, including their relationship to State Bar employees
or leaders and banking activities; 6) complaints against 700+ attorneys identified by State Auditor in
Report 2022-030, and their relationship with referral organizations; 7) State Bar's "Leadership Bank

1 Program and their ties and impact on referral organizations, as well as transactions between the
2 member banks and managers of the referral organizations; 5) Other investigation as may be
3 necessary.

4 **PRAYER FOR RELIEF**

5 **WHEREFORE, PLAINTIFF respectfully requests the following relief:**

- 6 1. For an award of general damages for not less than \$ 500, 000, 000;
- 7 2. For an award of treble of damages under RICO and antitrust Laws;
- 8 3. For an award of special damages;
- 9 4. For an award of punitive damages as allowed by Law;
- 10 5. For declaratory relief from Section 5.1. of the Rules of DEFENDANT OCBA
11 LRIS;
- 12 6. For mandatory injunction requiring DEFENDANT OCBA and OCBA LRIS
13 to remove Section 5.1. of OCBA LRIS Rules as violating antitrust Laws;
- 14 7. For mandatory injunction requiring DEFENDANTS OCBA; OCBA LRIS;
15 LACBA; LACBA SLRS; ASN; MATINDALE-NOLO; LEGAL MATCH to
16 provide public accommodation to PLAINTIFF on equal terms;
- 17 8. For mandatory injunction requiring DEFENDANTS OCBA; OCBA LRIS;
18 LACBA; LACBA LRS; ASN; LEGAL MATCH to provide PLAINTIFF with
19 referrals in compliance with the Rules of the State Bar of California;
- 20 9. For permanent injunction against DEFENDANTS OCBA; OCBA LRIS;
21 LACBA; LACBA LRS; ASN; LEGAL MATCH to stop using the referral
22 system to harass PLAINTIFF and leave her with no business;
- 23 10. For permanent injunction against DEFENDANTS ANCA and ANCAWR
24 to stop any harassment and stalking of PLAINTIFF;
- 25 11. For permanent injunction against Armenian Enterprise employed by all
26 DEFENDANTS banning their access to PLAINTIFF'S files, referrals going
27 to to the PLAINTIFF; management of the staff sending referrals to the
28 PLAINTIFF;

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- 12. For restraining orders against INDIVIDUAL DEFENDANTS ARAM HAMPARIAN, ARMEN SAHAKYAN and others as will be identified by further investigation to ban them from harassing, stalking and contacting the PLAINTIFF;
- 13. For mandatory injunction requiring DEFENDANTS ANCA and ANCAWR and their agents to remove all defamatory content about PLAINTIFF from all social media and other platforms, and to apologize;
- 14. For mandatory injunction requiring DEFENDANTS GOOGLE and YELP to remove all defamatory content about PLAINTIFF from their platforms;
- 15. For mandatory injunction requiring DEFENDANT GOOGLE to place proper information about PLAINTIFF’S business on its platform in a way not to confuse public;
- 16. For costs of suit incurred herein;
- 17. Reasonable attorney’s fees according to proof;
- 18. For such other and further relief as this Court deems just and proper;
- 19. For interest at the legal rate according to proof.

DATED: June 21, 2024

BY: 
 AYNUR BAGHIRZADE
 IN PRO PER SE

DEMAND FOR JURY TRIAL

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Plaintiffs hereby request a jury trial on all claims so triable.

DATED: June 21, 2024

BY: 
AYNUR BAGHIRZADE
IN PRO PER SE