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DECLARATION OF THI LUONG

I, Thi Luong, declare as follows:

1. I am employed by the State of California, Franchise Tax Board, as a Program Manager. I am authorized to make this declaration in my official capacity as an FTB employee and not otherwise.

2. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify to such facts under oath.

3. Attached to this Declaration, as Exhibit A, is a true and correct copy of the email I received from Plaintiff Christine N. Grab on June 3, 2021.

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

Executed on August 9, 2021 at Sacramento, California.

Thi Luong
Thi Luong

SD2020500859

Exhibit A

From: Christi Grab
To: Luong.Thi@FTB
Subject: So you can appreciate how FTB recklessly runs up litigation costs
Date: Thursday, June 03, 2021 3:09:28 PM

Hi Ms. Luong:

Since you said that you are carefully watching the litigation costs, I thought I would share with you my latest Motion to Compel, which will cost FTB thousands of dollars to defend. From the letter to the board below:

"Every item that I asked about should be publicly posted on your website. It is UNCONSCIONABLE that I have to request that a judge order you to answer basic questions such as "What is your definition of "timely?""

I think you should take some time to download and read the Motion for yourself so you can see exactly why FTB's litigation costs are so high. <https://roa.sdcourt.ca.gov/roa/faces/CaseSearch.xhtml>

The case number is court 37, year 2020, case #00005100. Scroll down a little ways until you get to the chart listing everything that has happened with the case. The item you want to download is ROA #39, the Declaration, which is near the top of the chart.

Regards,

Christine Grab

Begin forwarded message:

From: Christi Grab [REDACTED]
Subject: For Today's Board of Directors Meeting
Date: June 3, 2021 at 7:45:05 AM MST
To: "Stanislaus, Selvi@FTB" [REDACTED]

[REDACTED]
[REDACTED] "Mellor, Denise@FTB"
[REDACTED]

Cc: "Voet, Brenda@FTB" [REDACTED] "Maples,
Susan@FTB" [REDACTED]

Yesterday, I emailed the latest Motion to Compel in 5 parts and it looks like all the messages bounced because even 20 pages is too big for your servers to allow.

Yesterday, I resent pages 1 - 19 via fax to four different numbers and received fax confirmation from all four at about 11:30 am. Unfortunately, I didn't have a chance to send the rest of it yesterday.

This morning I sent the rest of the Motion. All four faxes for Pages 20 - 39 were received about 6:00 am. Pages 40 - 59 were received by one fax at 6:30, two faxes about 6:40, and the last one at 7:08. Pages 60 - 72 were received around 7:15 am.

The fax numbers I sent to were [REDACTED] and [REDACTED]. Please check all those fax machines. Or, alternatively, you can download the information from the court's website: <https://roa.sdcourt.ca.gov/roa/faces/CaseSearch.xhtml>

The case number is court 37, year 2020, case #00005100. Scroll down a little ways until you get to the chart listing everything that has happened with the case. The item you want to download is ROA #39, the Declaration, which is near the top of the chart.

Regards,

Christine Grab

Begin forwarded message:

From: Christi Grab [REDACTED]
Subject: For Tomorrow's Board Meeting -- pages 1 - 19
Date: June 2, 2021 at 6:57:48 AM MST
To: "Stanislaus, Selvi@FTB" [REDACTED]
"Brunett, Jozel@FTB" [REDACTED]
[REDACTED]
"Mellor, Denise@FTB"
[REDACTED]
Cc: "Voet, Brenda@FTB" [REDACTED]
"Maples, Susan@FTB" [REDACTED]
[REDACTED]

Dear FTB Executives:

Attached are pages 1 - 20 of my latest Motion to Compel Further Information for Specially Prepared Interrogatories #001: Clarification of FTB Policies and Procedures. I will send all the other pages as separate emails since you guys have a small limit on the size of attachments allowed.

Every item that I asked about should be publicly posted on your website. It is UNCONSCIONABLE that I have to request that a judge order you to answer basic questions such as "What is your definition of "timely?""

As you read this, it will become painfully clear that these unlawful schemes have been master-planned by FTB's executives so that each different department "makes mistakes" that all come together in such a way that ensures the false imposition of illicit revenue. As I have documented, the corruption is

so deeply ingrained into the fabric of FTB's operations that FTB cannot be salvaged — you just need to start fresh with a new agency.

At least now we know why Christopher Calhoun lied to Betty Yee back in 2017 by claiming we'd never responded to any notices!

Regards,

Christine Grab

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DECLARATION OF KEITH SWANK

I, Keith Swank, declare as follows:

1. I am employed by the State of California, Franchise Tax Board, as a Program Specialist III. I am authorized to make this declaration in my official capacity as an FTB employee and not otherwise.
2. I have personal knowledge of the facts set forth herein, and if called as a witness, could and would testify to such facts under oath.
3. Attached to this Declaration, as Exhibit A, is a true and correct copy of the email I received from Plaintiff Christine N. Grab on May 25, 2021 at 10:42 AM.
4. Attached to this Declaration, as Exhibit B, is a true and correct copy of another email I received from Plaintiff on May 25, 2021 at 11:23 AM.

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

Executed on August 11, 2021 at Sacramento, California.



Keith Swank

SD2020500859

Exhibit A

Swank, Keith@FTB

From: Christi Grab [REDACTED]
Sent: Tuesday, May 25, 2021 10:42 AM
To: Swank, Keith@FTB
Subject: Just in case this employer withheld this information from you....
Attachments: Meet and Confer For Plaintiff's Specially Prepared Interrogatories.pdf; ATT00001.htm

Mr. Swank:

I could be wrong, but I have a feeling that your employer has not disclosed this Meet and Confer to you. Please read it carefully. It is not too late to recant the perjurious statements that you have signed your name to. Remember that YOU are the one who will go to jail and pay the fines, not your boss or the people in the Legal Department.

Regards,

Christine Grab

Begin forwarded message:

From: Christi Grab [REDACTED]
Subject: Meet and Confer for Plaintiff's Specially Prepared Interrogatories Set #001
Date: May 10, 2021 at 5:33:56 PM PDT
To: Anna Barsegyan [REDACTED]

Hi Ms. Barsegyan,

I have again color coded the answers to make it easier to read. The new material for this Meet and Confer is in black. My original Interrogatory is in blue. FTB's response is in purple. When I am referring to a specific line of text, I have highlighted it in yellow.

As a part of this Meet and Confer, I will forward you the four emails that the Disclosure Department sent me in January 2021 in response to three California Public Records requests that I made in December 2020.

Please confirm receipt of this Meet and Confer, as well as the four emails from the Disclosure Department.

FTB's Meet and Confer Response is due on Monday, May 17, 2021. I will not allow any time extensions.

Please remind your client that I have the right to ask for sanctions.

Have a great week!

Christi

Exhibit B

Swank, Keith@FTB

From: Christi Grab
Sent: Tuesday, May 25, 2021 11:23 AM
To: Swank, Keith@FTB
Subject: Even More Damning Info That May Put You in Jail...

Hi Mr. Swank,

Yesterday, I filed a Motion to Compel Further Information for Specially Prepared Interrogatories Set #001. In it, the arguments regarding your perjury are even stronger than the arguments that were in the Meet and Confer document that I forwarded you earlier this morning.

I didn't send it earlier because it wasn't posted online yet, but the court has just updated their website to include the new filing. It can be found here: https://urldefense.proofpoint.com/v2/url?u=https-3A__roa.sdscourt.ca.gov_roa_faces_CaseSearch.xhtml&d=DwIFaQ&c=OH6BQJ87xST15P4a0P7x0PHDI-VIE9IGCC1zTIsL9ic&r=yXhS7vNXAoNs1cfx9egWRCab7_gKUQ6DcZSTL09hQnM&m=Jy1Zl4JQB8626D3DJ2kTPec5h75dpTFjP4I7xMOp55c&s=EtbjFtyqY9kl2fmZGG4e0I6ptC39obSAADy5u3nt3g&e=

The case number is court 37, year 2020, case #00005100. Scroll down a little ways until you get to the chart listing everything that has happened with the case. The item you want to download is ROA #39, the Declaration, which is the top line item in the chart.

Once again, knowing your employer's track record for setting people up as patsies, I want to make sure you have complete informed consent on what you are getting yourself into by not recanting these perjurious statements. You also should probably consult a lawyer, too (not an FTB lawyer, get your own outside legal counsel that will protect YOU).

I hope you make a wise choice.

Regards,

Christine Grab

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DECLARATION OF GRACE LEBLEU

I, Grace LeBleu declare as follows:

- 1. I am employed by the State of California, Franchise Tax Board (FTB) as a Senior Disclosure Specialist. I am authorized to make this declaration in support of FTB's Motion for Sanctions Pursuant to Code of Civil Procedure Section 128.5 (the Motion). I have personal knowledge of the following facts, and if called as a witness, I could and would testify competently thereto.
- 2. I am familiar with the filing and recordkeeping systems of the FTB and how its business records are stored.
- 3. Attached to this Declaration, as Exhibit A, is a true and correct copy of the Public Records Act (PRA) request the FTB received from Plaintiff on July 23, 2021.
- 4. Attached to this Declaration, as Exhibit B, is a true and correct copy of the Public Records Act (PRA) request the FTB received from Plaintiff on July 23, 2021.
- 5. Attached to this Declaration, as Exhibit C, is a true and correct copy of the Public Records Act (PRA) request the FTB received from Plaintiff on July 27, 2021.

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

Executed on August 12, 2021 at Sacramento, California.

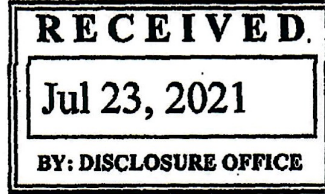


Grace LeBleu

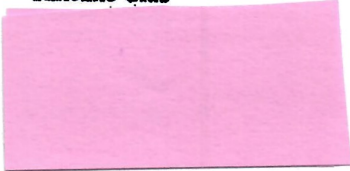
SD2020500859

Exhibit A

CASE #:21-00615



Christine Grab



July 22, 2021

Disclosure Department
Franchise Tax Board
Fax: 916-845-4849

Dear Disclosure Department:

I am regarding to my account [redacted] and my husband's account (Eric Grab [redacted])
 As I have already documented in previous complaint letters that I have sent to FTB Executive Staff and Board of Directors over the years, on July 9, 2014, Carrey Burton- Bellby told me to send FTB more money than the amount that was due per the bill that FTB had issued. On May 17, 2016, a male FTB employee also ordered me to send FTB more money than was due per the bill that FTB had issued. In both cases, FTB falsified their internal accounting records to make it appear that the amount that I was told to send was the correct amount of money that was due.

I am writing to request information on these two employees so that I can file formal criminal charges against them.

Both of these calls were placed into the notes on my account, so you should be able to locate both employees by pulling up my account notes, finding the specific entries for the two dates in question, and identifying which employee made the notes.

I am requesting disclosure of Ms. Burton- Bellby's employee number, her job title on July 9, 2014, her job title now, and whether or not she had an oath of office at that point in time. If she did have an oath of office, I would like you to provide this oath.

I am also requesting the full name and the employee number of the gentlemen who assisted me on May 17, 2016, along with his job title on May 17, 2016, his job title now, and whether or not he had an oath of office at that point in time. If he did have an oath of office, I would like you to provide this oath.

Since this is a *bona-fide* criminal matter, failure to provide this information will be considered collusion to cover up criminal activities, and I will instead file collusion charges against Dennis Haase and Grace LeBleu.

Should you have any questions, my contact information is above. I would like FTB's response to this request faxed to me at the above fax number.

Regards,



Christine Grab

Exhibit B

CASE #:21-00619

RECEIVED

Jul 23, 2021

BY: DISCLOSURE OFFICE
Christopher Calhoun

Reiser, Jarrod@FTB

From:

Christi Grab

Sent:

Friday, July 23, 2021 7:12 AM

To:

DisclosurePRA

Subject:

Disclosure Request Taxpayer Advocate/Eric Yadao/Christopher Calhoun

Christine Grab

July 23, 2021

Disclosure Department

Franchise Tax Board

Email: disclosurePRA@FTB.CA.gov

Dear Disclosure Department:

I am requesting a copy of the Oath of Office that the Taxpayer Advocate takes upon assuming that job position. I am also requesting to know if Eric Yadao (legal department) and Christopher Calhoun (Advocate and Executive Services) took an Oath of Office at any point in their careers as an FTB employee. If so, please send me a copy of any/all oaths taken by Mr. Yadao and Mr. Calhoun

I am also requesting disclosure of the employee numbers for Eric Yadao and Christopher Calhoun, as well as for former Taxpayer Advocates Susan Maples and Chris Smith, as well as the current job titles of Mr. Yadao, Mr. Calhoun, Ms. Maples and Mr. Smith.

Thank you again for all your help.

Christine Grab

Exhibit C

Reiser, Jarrod@FTB

From: Christi Grab [REDACTED]
Sent: Tuesday, July 27, 2021 8:21 AM
To: DisclosurePRA
Subject: PRA Requests for Shaltes/Swank/Hubbard

CASE #:21-00629

RECEIVED

Jul 27, 2021

BY: DISCLOSURE OFFICE

Christine Grab [REDACTED]

July 27, 2021

Disclosure Department

Franchise Tax Board

Email: disclosurePRA@FTB.CA.gov

Dear Disclosure Department:

First of all, I am so sorry for the multiple duplicate emails that I sent last week. I am currently away from my home in San Diego, and where I was last week had terrible internet connectivity. I think what happened was my computer kept trying to send the message and it kept failing to transmit, and each time it failed, the message replicated itself. After such a hard time with the last request, I decided to wait to send this request until I had a better connection. While the connection I have right now is better, it still isn't good, so I apologize in advance if this message also becomes duplicated.

I am requesting to know if Craig Shaltes took an oath of office for his position as TAAP Supervisor (or maybe it was TAAP coordinator?) under the Taxpayer Advocate's umbrella. If he did take an oath of office for that position, could you please send me a copy of it? Also, please tell me Mr. Shaltes current job title.

Could you please tell me which department that Keith Swank, Program Specialist III, works under and who his supervisor is? That is a very generic title. Did Mr. Swank take an oath of office for this job? If so, could you please provide it?

Could you please tell me which department that Chelsea Hubbard, Associate Operations Specialist, works under and who her supervisor is? That is a very generic title. Did Ms. Hubbard take an oath of office for this job? If so, could you please provide it?

Thank you again for all your help.

Christine Grab