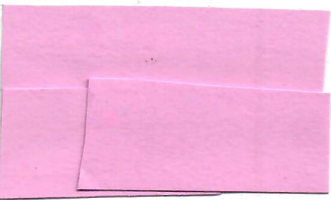


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Christine N. Grab



Christine N. Grab, Attornatus Privatus

FEDERAL TREASURY INSPECTOR GENERAL FOR TAX ADMINISTRATION
AND
UNITED STATES ATTORNEY GENERAL'S OFFICE
AND
COMMON LAW COURT OF RECORD, SACRAMENTO, CA

Christine N. Grab

Declarant

vs.

Carrey Burton-Beilby

Alexis Bear

Anna Barsegyan,

Defendant(s).

) **Verified Complaint for Fraud, Conspiracy,**
) **Collusion to Cover Up Crimes, Harassment,**
) **Retaliation, Obstruction of Justice, Abuse of**
) **Justice System, Treason of Oath**
)
) **FILED: NOVEMBER 18, 2021**
)
) **BEFORE FEDERAL TREASURY**
) **INSPECTOR GENERAL FOR TAX**
) **ADMINISTRATION, UNITED STATES**
) **ATTORNEY GENERAL'S OFFICE, FBI,**
) **SACRAMENTO GRAND JURY AND**
) **OTHER QUALIFIED MAGISTRATES**
)

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Table of Points and Authorities is located in Exhibit 3, pages 74 - 83

1 **Affidavit of Complaint**

2 I, Christine N. Grab, Declarant, one of the people of California, having observed violations
3 of law by employees under TIGTA and grand jury dominion, brings my redress of grievances in the
4 form of a verified Criminal Complaint at law against defendants individually and severally for
5 willfully and intentionally violating statutory laws, common laws and my statutory rights, causing
6 injury to me. By misprision (18 USC §4), I am compelled to report felony violations by Franchise
7 Tax Board bureau employees and California Department of Justice employees which I have
8 observed or have cause to know. Based on personal knowledge and evidence in-hand, I humbly
9 present this Verified Criminal Complaint.
10

11
12 **Overview of Complaint**

13 I have caught The California Franchise Tax Board (FTB), California's income tax agency,
14 running eight unlawful schemes to overcharge taxpayers. Three of the schemes are
15 embezzlement/racketeering schemes, one is a racketeering scheme, and four are schemes to
16 overcharge interest. Exhibit one is an explanation of how the eight schemes work, and exhibits 2 -
17 20 are the proof.
18

19 One of the schemes to overcharge interest involves FTB employees in the Collections
20 department directing taxpayers to send in more money than the bill states is due. FTB then alters its
21 internal accounting records to make it appear that was the amount of money that was always due.
22

23 This Criminal Complaint is against the two FTB employees who defrauded me by ordering
24 me to send more money to FTB than was due: Carrey Burton-Beilby and Alexis Bear. My
25 understanding is that there is no statute of limitations on fraud.
26

27 I believe that the charge of Conspiracy with their employer also applies. In both cases, the
28 defendants falsified their employer's internal records to make it appear that was the correct amount

1 of money due. In both cases, their employer was the beneficiary of the criminal activities, so it
2 appears that the defendants each conspired with their employer to overcharge me. Because the
3 overcharge/falsification of records happened twice, it appears to be systematic. While the dollar
4 amounts are small, if the Collections staff each overcharge by a few dollars per person, then FTB is
5 generating millions of dollars a year in illicit revenue.
6

7 This Complaint is also against CA Deputy Attorney-General Anna Barsegyan. I currently
8 have civil litigation pending in San Diego Superior Court against the CA Franchise Tax Board for a
9 refund of penalties, interest and fees for tax years 2011, 2013 and 2014. The schemes to overcharge
10 interest were exposed via documents procured during Discovery of the civil case (exhibit 16).

11 Ms. Barsegyan is FTB's legal counsel for the civil case. Ms. Barsegyan has unlawfully
12 retaliated against me and harassed me for filing a police report against Ms. Burton-Beilby for the
13 fraud that is detailed below by filing a frivolous Motion for Sanctions in the civil case and by
14 posting my and my husband's full social security numbers on a public internet site.
15

16 The police report that I filed and this Criminal Complaint both address issues that are
17 beyond the scope of the civil matter that is pending in Superior Court. I believe that requesting that
18 the Superior Court stop me from, and punish me for, pursuing matters that are beyond the scope of
19 that case is an abuse of the justice system and a threat to try to intimidate me into silence.
20

21 Furthermore, I believe that the Motion for Sanctions was an attempt to obstruct justice. I
22 believe that she colluded with her client to cover up her client's *bona-fide* criminal activities by
23 trying to stop me from, and punish me for, exercising my legal right to gather evidence of criminal
24 activities. I also believe the Motion for Sanctions was an attempt to stop me from filing this Federal
25 Criminal Complaint, along with the rest of the Criminal Complaints that I intend to file.
26
27
28

1 Because FTB has an established history of improperly exposing social security numbers to
2 retaliate and harass taxpayers, I believe that Ms. Barsegyan conspired with her client to utilize the
3 retaliation tactic of publicly exposing our social security numbers.
4

5
6 **Crime #1: The \$2.72 Fraudulent Overcharge Perpetrated by Carrey Burton-Beilby**

7 On 06-02-2014, FTB employee Carrey Burton-Beilby told me the amount due for penalties
8 and interest for tax year 2011 was \$3,972.00. She promised to take the money out of the
9 overpayment that we had made for tax year 2011 (exhibit 17, page 6).

10 On 07-09-2014, I contacted FTB again regarding a notice that I received stating that our
11 2011 account balance was still outstanding. Ms. Burton-Beilby told me that she had been unable to
12 take the money out of the overpayment, and thus no payment had been made. Ms. Burton-Beilby
13 told me that the balance now due to pay my account in full was \$3,854.74 (exhibit 17, page 7).
14

15 I found it odd that the balance went down instead of up; after all, another month of interest
16 had accrued. I documented these two incidents in the Abatement Request (which was a request for
17 refund of penalties, fees and interest) that I filed with FTB on 08-04-2014 (exhibit 17, page 8).
18

19 FTB denied my Abatement Request. I filed an appeal with the Board of Equalization, which
20 at the time was the administrative court that handled FTB Appeals. While my case was pending, the
21 administration of FTB Appeals was moved from the Board of Equalization to the newly created
22 Office of Tax Appeals. In November 2019, The OTA sided with FTB on the matter. On January 29,
23 2020, I filed a new appeal with San Diego Superior Court in accordance with A.B. 102 section 13,
24 A.B. 131 section 14 and Cal Government Code section 15677.

25 As I was preparing for my BOE/OTA case, I realized that my bill stated only \$3,852.02 had
26 been due on 07-09-2014. But FTB's internal accounting records made it appear that the number that
27 Ms. Burton-Beilby had quoted me was the correct amount (exhibit 17, pages 13 – 15).
28

1 I immediately contacted FTB's Board of Directors and the Governor's office to alert them to
2 the fact that a FTB employee had ordered me to send in more money than was due, and that FTB
3 had falsified their internal documents to make it appear that it was the correct amount due (exhibit
4 17, pages 9 – 12).

5
6 When both phone calls occurred, I was in my home in San Diego. To the best of my
7 knowledge, Ms. Burton-Beilby was located in FTB's headquarters in Sacramento, CA. Her job title
8 at the time was Senior Compliance Representative. As of August 2, 2021, she was still employed
9 with FTB. Her current position number is [REDACTED] (exhibit 21, pages 1 -3).

10 Exhibit 21, page 4 is Ms. Burton-Beilby's Oath of Affirmation, where she swore to "...bear
11 true faith and allegiance to the Constitution of the United States and the Constitution of the State of
12 California..." I believe that committing fraud and conspiring with her employer to commit fraud
13 while acting in her official capacity as a representative of the State of California constitutes a
14 violation of her oath.
15

16 When I contacted the DA's office about this matter, the person I spoke with told me that
17 step one in the bureaucratic system is to file a police report. I attempted to file a police report
18 against Ms. Burton-Beilby on 08-29-2021, but SDPD would not take the report. I filed a report on
19 the FBI's ic3.gov site in early October 2021 (I don't see a date submitted on the report) (exhibit 22).
20

21
22 **Crime #2: The \$7.05 Fraudulent Overcharge Perpetrated by Alexis Bear**

23 As a part of Discovery for the San Diego Superior Court case, I requested amortization
24 schedules. While reviewing the amortization schedules that FTB provided, I saw that for tax year
25 2014, I had been charged two Demand Penalties, one for \$3,873 and one for \$7.04 (see exhibit 16,
26 page 7).
27
28

1 Per FTB's own internal documents that were provided by FTB's Disclosure Department,
2 there is to be only one Demand Penalty imposer per tax year, which is calculated at 25% of the tax
3 liability for that year. I knew that the second Demand Penalty for \$7.05 was fraudulent (exhibit 4).

4 I pulled out the statements that FTB had sent me over the years and compared them to the
5 records that FTB had provided for Discovery. I also hand-calculated the amortization schedules (I
6 worked in the mortgage industry for 11 years and interest calculations were a part of my job). I was
7 able to locate exactly where the fraudulent charge originated and how FTB "cooked the books" to
8 hide the overcharge:
9

10 On 12-22-2015, FTB issued a bill for tax year 2013 stating that \$7,230.77 was due by 01-06-
11 16 (exhibit 16, page 11). On 01-19-2016, I mailed in a check to FTB for \$7,230.77. The check
12 cleared my bank on 02-10-16.
13

14 Meanwhile, on 01-27-16, another bill was generated stating that my total was now \$7,251.92
15 if paid by 02-11-16 (exhibit 16, page 12). Per the FTB's own enclosed two bills, this meant that I
16 still had balance due of \$21.15.

17 FTB "lost" the payment of \$7,230.77 (exhibit 23, page 1). On 02-24-2016, when FTB
18 representative Alexis Bear located the "lost" money, (s)he told me (s)he would backdate the
19 payment to 02-08-11, which the enclosed 2013 interest calculation confirms (exhibit 16, page 6).
20 (S)he told me that my remaining balance due was \$28.20, which is \$7.05 more than what the bill
21 issued on 02-11-16 stated was owed.
22

23 I paid this \$28.20 via Webpay on 02-24-16 (exhibit 16, page 13 and exhibit 23, page 1), but
24 FTB never pulled the money from my account. On 03-16-2016, FTB issued another notice stating
25 that the balance due was \$28.20, so it appears that Alexis Bear had manually changed the system to
26 reflect the interest overcharge amount that (s)he had quoted me (exhibit 16, page 14). I paid the
27 \$28.20 via a check on 05-31-2016.
28

1 The payments for \$7,230.77 and \$28.20 were both made prior to our filing our tax year 2013
2 returns. Once we filed that return, the tax liability amount was amended and our interest was re-
3 calculated. Per the enclosed 2013 amortization record (exhibit 16, page 6), we were overcharged
4 interest by 45 cents. The fraudulent \$7.05 interest overcharge was moved to tax year 2014 and listed
5 as a second demand penalty.
6

7 The crime occurred via the telephone. I was located in my home in San Diego. To the best
8 of my knowledge, Alexis Bear was located in FTB's headquarters in Sacramento, CA. Alexis
9 Bear's job title at the time was Tax Technician. As of 09-27-2021, (s)he was still employed with
10 FTB. Bear's current position number is [REDACTED] (exhibit 23, page 2).
11

12 Exhibit 23, page 3 is Alexis Bear's Oath of Affirmation, where (s)he swore to "...bear true
13 faith and allegiance to the Constitution of the United States and the Constitution of the State of
14 California..." I believe that committing fraud and conspiring with his/her employer to commit fraud
15 while acting in his/her official capacity as a representative of the State of California constitutes a
16 violation of his/her oath.

17 I filed a report on the FBI's ic3.gov site in early October 2021 (I don't see a date submitted
18 on the report) (exhibit 24).
19

20
21 **Harassment, Retaliation, Abuse of the Court System, Violation of Rights, Obstruction of**
22 **Justice and Collusion to Cover Up Criminal Activities Perpetrated by Anna Barsegyan**

23 On 07-22-2021, 07-23-2021 and 07-27-2021, I made California Public Records Requests
24 from the Franchise Tax Board in which I requested the names, job titles, employee numbers and
25 copies of the Oaths of Affirmation for several FTB employees (exhibit 25). In the 07-22-2021 letter,
26 I wrote "I am writing to request information on these two employees so that I can file formal
27 criminal charges against them" (exhibit 25, page 1).
28

1 On 07-23-2021, I emailed Ms. Barsegyan and requested her employee number and a copy of
2 her Oath of Affirmation. Ms. Barsegyan responded with the following false statement:

3 “Unfortunately, that is personal information and cannot be provided.” On 07-27-2021, I made a
4 California Public Requests Act to the Department of Justice for a copy of Ms. Barsegyan’s oath. In
5 that request, I complained to the Department of Justice about her false statement (exhibit 26).
6

7 On Sunday, 08-29-2021, I filed a police report with the San Diego Police Department
8 against Ms. Burton-Beilby and another FTB employee named [REDACTED] for the crimes detailed
9 above (exhibit 22, page 1).

10 As I was preparing this Federal Criminal Complaint, I realized that [REDACTED] was not the
11 perpetrator of the \$7.05 overcharge. On 09-17-2021, I made another California Public Records
12 Request for information on the true perpetrator of the \$7.05 overcharge. On 09-27-2021, FTB
13 disclosed that the true perpetrator was Alexis Bear (exhibit 23, page 2).
14

15 The day after I filed the police report, on Monday, 08-30-2021, Ms. Barsegyan made a
16 reservation with the court for a Motion for Sanctions hearing. Two days later, on 09-01-2021, Ms.
17 Barsegyan filed a Motion for Sanctions with the court (exhibit 27, page 15).
18

19 In her moving papers, Ms. Barsegyan did not redact my husband’s or my social security
20 numbers from the letter that I had sent to the Disclosure Department (exhibit 25, pages 1 – 2 is a
21 copy of the letter that wasn’t redacted in the moving papers; proof it wasn’t redacted is exhibit 28),
22 which is a violation of the California Rules of the Court, Rule 1.201. Protection of Privacy, which
23 states:

24 (a) Exclusion or redaction of identifiers. To protect personal privacy and other legitimate
25 interests, parties and their attorneys must not include, or must redact where inclusion is
26 necessary, the following identifiers from all pleadings and other papers filed in the court’s
27 public file, whether filed in paper or electronic form, unless otherwise provided by law or
28

1 ordered by the court: (1) Social security numbers. If an individual's social security number is
2 required in a pleading or other paper filed in the public file, only the last four digits of that
3 number may be used.

4 In the opening of her Motion, Ms. Barsegyan boldly stated that the purpose of the Motion was
5 to request that the San Diego Superior Court judge stop me from, and punish me, for exercising my
6 right to gather information for this and other Criminal Complaints that I intend to file. She wrote:
7 "...she has made...allegations of collusion and government corruption and racketeering against
8 FTB... Plaintiff's... conduct... is unlikely to end without court intervention... this Court should
9 grant FTB's Motion for Sanctions... to deter and preclude Plaintiff from continuing in
10 her...behavior" (exhibit 27, page 6).

11 Ms. Barsegyan further stated on page 9 that the grounds for her Motion included: "...
12 submitting multiple Public Record Act (PRA) requests for copies of oaths taken by FTB personnel
13 and their employee numbers." On page 9, she continued "...Plaintiff emailed FTB counsel also
14 requesting a copy of the oath she took for office, and her employee number."

15 It is worth noting that in her Motion for Sanctions, Ms. Barsegyan omitted that I had
16 disclosed my intent to file a Criminal Complaint. Ms. Barsegyan omitted that she responded to my
17 request with a false statement, and omitted that I had complained to the Department of Justice about
18 her false statement.

19 In her Motion for Sanctions, Ms. Barsegyan also requested that I be sanctioned for pointing
20 out that both she and her client had made numerous deceptive, misleading, and false statements to
21 the judge. On page 13 – 14 she wrote "awarding nonmonetary sanctions against Plaintiff precluding
22 her from advancing baseless government corruption, racketeering and collusion claims..." I believe
23 that asking the judge to punish me for making factually accurate statements that had been supported
24 by evidence constitutes abuse of the justice system and a threat to try to stop me from pursuing
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1 criminal charges against FTB staff for their documented criminal behaviors.

2 The deceptive, misleading, and false statements made by Ms. Barsegyan, FTB employee
3 Keith Swank, and FTB employee Chelsea Hubbard that are addressed in the Motion for Sanctions
4 are outside the scope of this Complaint, which is focused on the overcharging of interest and Ms.
5 Barsegyan's attempt to obstruct justice regarding reporting the crime of overcharging interest. I will
6 address the aforementioned deceptive, misleading, and false statements in detail in a separate
7 Criminal Complaint against Ms. Barsegyan, Mr. Swank, and Ms. Hubbard, which will specifically
8 addresses the issues of embezzlement, racketeering, and collusion to cover up embezzlement and
9 racketeering.
10

11 In her Motion for Sanctions, Ms. Barsegyan also made several false allegations, including
12 that I threatened FTB staff and that I'd stated that I was deliberately trying to run up court costs.
13 The false statements and allegations made by Ms. Barsegyan in the Motion for Sanctions will be
14 also be addressed in the forthcoming criminal complaint mentioned above.
15

16 While Ms. Barsegyan has stated that the lack of redaction of the social security numbers was
17 "inadvertent" (exhibit 29, page 2), based on FTB's and Ms. Barsegyan's documented history, I
18 believe the breach was intentional:

19 A. Between my original case with the Office of Tax Appeals, the pending case in San Diego
20 Superior Court, and other miscellaneous requests that I've made over the last few years, Grace
21 LeBleu has personally redacted more than 1,000 pages of documents with my and my husband's
22 personal information on it. Ms. LeBleu is excellent at her job. It is out of character for her to not
23 redact social security numbers (exhibit 29, page 2).
24

25 B. Even if Ms. LeBleu had made an error by not noticing the social security numbers, there
26 is no excuse for Ms. Barsegyan nor Ms. Barsegyan's paralegal to not have noticed the social
27 security numbers and redacted them.
28

1 C. I had disclosed in my California Public Requests made to FTB on 07-22-2021 that I was
2 collecting the information for a Criminal Complaint (exhibit 25, page 1).

3 D. I filed a police report with SDPD against two FTB employees for defrauding me the day
4 before the reservation for the Motion for Sanctions was made and three days before the public
5 exposure of my and my husband's full social security numbers (exhibit 22, page 1 and exhibit 27,
6 page 15).

7 E. I had recently filed a complaint with the DOJ about Ms. Barsegyan making the false
8 statement that it was illegal to disclose her oath of office (exhibit 26, page 3).

9 F. FTB has a documented history of exposing social security numbers as a tool of
10 harassment. In FTB v Hyatt (2017, docket #53264), the Nevada Supreme Court upheld a lower
11 court ruling that sufficient evidence supported a damages award, and awarded Mr. Hyatt \$50,000 in
12 damages for intentional infliction of emotional distress. FTB had used multiple harassment
13 techniques against Mr. Hyatt, and one of the techniques was to improperly share his social security
14 number with third parties (exhibit 30).

15 G. Ms. Barsegyan has a documented history of harassing me. Exhibit 31 is a Meet and
16 Confer for Defendant's Interrogatories. In the Meet and Confer, Ms. Barsegyan used the same
17 harassment techniques that she utilized in her Motion for Sanctions: 1. She used deception and
18 misrepresentations of what I had written to make the facts of the situation seem different than they
19 really were (see pages 5, 7, 8, 9). 2. She refused to acknowledge receipt of the original Complaint
20 that I had filed with San Diego Superior Court on 01-20-2020, refused to acknowledge receipt of
21 the Motion to Compel that I had filed with San Diego Superior Court on 12-15-2020, and refused to
22 acknowledge receipt of any of the exhibits that were attached the Complaint and Motion. She
23 implied that I had refused to provide copies of these documents her, then demanded that I resend all
24 the documents to her again (see pages 8, 9).

1 Exhibit 26, pages 1 and 2 is Ms. Barsegyan's Oath of Affirmation, where she swore to
2 "...bear true faith and allegiance to the Constitution of the United States and the Constitution of the
3 State of California..." I believe that her efforts to cover up *bona-fide* criminal activities via an
4 assortment of unlawful tactics, including Harassment, Retaliation, Violation of Rights, Abuse of the
5 Court System, and Obstruction of Justice while acting in her official capacity as a representative of
6 the State of California constitutes a violation of her oath.
7

8 The irony is that the purpose of the California Department of Justice, Ms. Barsegyan's
9 employer, is to protect California's constituents from being victimized by criminals. Yet in this
10 case, Ms. Barsegyan's has utilized malfeasance and willful misconduct in her official capacity as a
11 representative of the State of California in order to protect criminals from the very constituents that
12 she is supposed to be protecting.
13

14 **Closing**

15 I believe that I have documented that FTB is engaging in multiple *bona-fide* criminal
16 schemes designed to overcharge taxpayers via unlawful imposition of penalties and overcharging of
17 interest. I am requesting that an investigation be launched into all of the unlawful practices
18 documented in exhibits 1 – 20.
19

20 I am also requesting that a complete investigation be launched into Alexis Bear, Carrey
21 Burton-Beilby, and every other Collection agent who has been employed by FTB over the last
22 twenty years to discover the extent of FTB's fraudulent overcharges. At this point, it is clear that the
23 malfeasance and willful misconduct of FTB employees is of such routine nature that the only
24 conclusion is that FTB is a *criminal business enterprise* worthy of individual and group sanctions as
25 provided by the RICO laws. Corporations, being a creation of the state, and its employees may not
26 do on their own what is prohibited the state laws.
27
28

1 I am requesting that Bear, Burton-Beilby and every other Collection agent who has been
2 systematically defrauding taxpayers in collusion with their employer be criminally prosecuted to the
3 maximum punishment allowed by law.

4 I am further requesting California Deputy-Attorney General Anna Barsegyan be disbarred
5 and criminally prosecuted to the maximum extent allowed by law for her efforts to cover up the
6 criminal activities via an assortment of unlawful tactics, including Harassment, Retaliation,
7 Violation of Rights, Abuse of the Court System, and Obstruction of Justice.

8 I have documented that since 2016, I have attempted to procure legal intervention from
9 many different agencies within the State of California, including assorted state legislators, the
10 Governor's Office, local police and the District Attorney. Since it is clear that the authorities of the
11 State of California will not intervene to halt these unlawful activities, I am requesting that the
12 Federal Government and the Sacramento Grand Jury intervene to protect its citizens under the
13 authority of the Constitution.
14
15
16

17 **Verification**

18 I declare under penalty of perjury under the laws of the United States that all of the
19 foregoing is true and correct to the best of my knowledge.
20

21 Dated

22 11-18-2021

23 

24 Christine N. Grab
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List of Exhibits

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