



The State Bar of California

845 South Figueroa Street, Los Angeles, CA 90017

OFFICE OF CHIEF TRIAL COUNSEL

800-843-9053
Fax: 213-765-1168

Attorney Misconduct Complaint Form

Your Information		
Title:		
First Name: Christine	Middle Name: N.	
Last Name: Grab		
Address: [REDACTED]		
City: San Diego	State: CA	Zip Code: [REDACTED]
Email: [REDACTED]		
Home Phone:	Work Phone:	Cell Phone: [REDACTED]

If you prefer to communicate by email, please provide an email address. Complaints are confidential unless charges are filed. So that we may promptly communicate with you, please provide an email address to which you have exclusive access is not share with others.

Attorney's Information		
First Name: Anna	Middle Name:	
Last Name: Barsegyan		
Address: 300 S Spring St. Ste 1702		
City: Los Angeles	State: CA	Zip Code: 90013-1256
Email: [REDACTED]	CA Bar License #: 271878	
Primary Phone: [REDACTED]	Other Phone:	
Cell Phone:	Website:	

Complaint Information
To better achieve the State Bar's mission to protect the public, please answer the following questions:
Have you or a member of your family complained to the State Bar about this attorney previously?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Did you hire this attorney?
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Does this complaint involve allegations of theft?

Yes No

Does this complaint involve allegations of attorney misconduct where a person 65 years of age or older was victimized?

Yes No

Does this complaint involve allegations of attorney misconduct where a person who is incapacitated, infirm, disabled, incarcerated, an immigrant, or a minor was victimized?

Yes No

Does this complaint involve allegations that the attorney has abandoned a client?

Yes No

Statement of Complaint

Include with your submission, a statement of what the attorney did or did not do that is the basis of your complaint. Please state the facts as you understand them. Do not include opinions or arguments. If you hired the attorney(s), state what you hired the attorney(s) to do. Additional information may be requested.

See attached

Related Court Case Information (If known)

Name of Court: San Diego Superior Court

Case Name: Grab vs. The California Franchise Tax Board

Case Number: 2020-00005100 CL-BT-CTL

Approx. date case was filed: January 29, 2020

Size of law firm complained about: I am not sure

If you are not a party to this case, what is your connection with it? Explain briefly.
I was the plaintiff.

Translation Information

Not Applicable

The State Bar accepts complaints in over 200 languages. If you need translation services to communicate with the State Bar, please let us know by completing this section of the complaint form. We will communicate with you through a translation service in the language of your choice. Do you need translation services?

Yes

No

Please state the language in which you need formal translation:

The State Bar's mission is to protect complainants regardless of their immigration status. Complainants who are unable to complete this form due to disability, language restrictions, or other circumstances may obtain help by calling the complaint line at 800-843-9053.

Submission

By checking this box I certify that all information on this form is true and correct. I understand that the content of my complaint can be disclosed to the attorney. I understand that I waive the attorney client privilege and any other applicable privilege between myself and the attorney to the extent necessary for the investigation and prosecution of the allegations.

Signature:

C. Grab

Date:

December 19, 2022

Statement of Complaint

Enclosed is a Federal Criminal Complaint (FCC) and all of the supporting evidence that I filed against Anna Barsegyan and two other people with the Federal Treasury Inspector General, the Sacramento Grand Jury, and the Federal Bureau of Investigation on March 7, 2022.

Anna Barsegyan was charged in the FCC because I believe and allege that as counsel, Anna Barsegyan crossed the line between competently representing her client into actively participating in her client's criminal cover-up on numerous occasions. To accomplish this cover up, she used an assortment of unlawful tactics, including Harassment, Retaliation, Violation of Rights, Abuse of the Court System, and Obstruction of Justice. In doing so, she repeatedly violated the American Bar Association rules 8.4 (a), (c) and (g).

I request that Anna Barsegyan be immediately disbarred. The full details of her unethical and unlawful behavior are documented in the Complaint. Here is a quick reference of her most egregious violations:

1. I believe that Anna Barsegyan is protecting the identity of a third party who committed *suborning perjury*, and is thus *a co-conspirator to commit suborning perjury*. See pages 24 and 34 for victim Keith Swank and pages 61 – 64 for victims Chelsea Hubbard/Grace LeBleu. This violates rule 8.4(a): violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another
2. I believe that Anna Barsegyan directed her client to violate my state and federal rights in order to hide her client's unlawful business practices. This is *conspiracy to commit a misdemeanor*, which is a felony, and a violation of 18 USC §241, conspiracy against

rights, as well as a violation of American Bar Association rule 8.4 (a) and (c). See pages 21 – 22.

3. I believe that Anna Barsegyan conspired with her client to publicly post my and my husband's social security numbers on the Internet in violation of CRC Rule 1.201. Anna Barsegyan readily admits that she posted the numbers "inadvertently." However, too many "mistakes" were made for the exposure to not be intentional. FTB violated California Government Code section 15705 by giving Anna Barsegyan unredacted documents intended to file with the court. Anna Barsegyan violated CCP 128.7 (c) by serving me after the documents had already been publicly filed. Had she not violated CCP 128.7 (c), I would have caught the social security numbers and had her redact them prior to submission. See pages 41 – 44.

FTB has an established history of improperly exposing social security numbers to retaliate and harass people who challenge their legal authority. In *FTB v Hyatt* (2017, docket #53264), Gilbert Hyatt was initially awarded \$389 million in damages in the Nevada civil court ruling for intentional infliction of emotional distress. FTB had used multiple harassment techniques against Mr. Hyatt. One of the techniques was to improperly share his social security number with third parties. On appeal, the NV Supreme Court upheld the intent of the lower court's decision, but reduced the award amount to \$100,000 because of a Nevada state-specific law limiting government payouts.

I believe that Anna Barsegyan should be disbarred per the American Bar Association rule 8.4(g) “engage in conduct that the lawyer knows or reasonably should know is harassment or discrimination.”

4. There were numerous violations of American Bar Association rule 8.4(c), by “engage in conduct involving dishonesty, fraud, deceit or misrepresentation.” There were also numerous violations of rule 8.4(g) “engage in conduct that the lawyer knows or reasonably should know is harassment or discrimination.” See pages 47 – 65 for a list of examples.
5. Anna Barsegyan improperly utilized the SDSC court system to *obstruct justice* by asking the judge to silence me from speaking about and to stop me from collecting evidence for matters that were beyond the scope of the SDSC civil case, which is a violation of 18 USC § 4 (required to report felony violations to a qualified magistrate). Anna Barsegyan asked the judge to become a co-conspirator in the cover-up of criminal activities , which violates American Bar Association rule 8.4(a). See pages 43 – 46 and page 48.

In addition to the allegations addressed in the FCC, another incident of egregious violation of federal and state laws has recently occurred. After the social security number exposure, FTB and DOJ led me to believe that I had no recourse other than a request for a Motion for Sanctions or a Bar Complaint. I believe that not disclosing that I could have also filed a claim against Anna Barsegyan’s and Grace LeBleu’s State of California Government Employee Bonds as another avenue of recourse qualifies as committing fraud via omission.

When I did eventually find out that it was possible to file a claim against Barsegyan and LeBleu's government bonds for the violations of CRC, Rule 1.201 and California Government Code section 15705, I contacted the DOJ in accordance with my rights under California Government Code Section 1430 and requested the bond information. The DOJ refused to disclose the relevant information that I could file the claim with the Department of General Services, Office of Risk and Insurance Management, Government Claims Program. The DOJ went so far as to make completely false statements about the contents of state law and used deception to make it appear that the relevant laws didn't exist (see email thread dated December 5 – December 16). This outright fraud was intended to stop me from exercising my right to file a bond claim. The DOJ has violated 18 US Criminal Code section §1001, which says:

Section 1001(a) provides that it is a federal crime, in a matter within the jurisdiction of a government agency, to (1) falsify, conceal or cover up a material fact, (2) make any materially false, fictitious or fraudulent statement, or (3) make or use a document containing a materially false statement.

Since multiple people were on the thread in which the DOJ gave me this false information, the DOJ has violated 18 US Criminal 18 USC §241, which says:

“If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same... They shall be fined under this title or imprisoned not more than ten years, or both....”

Clearly, the reason DOJ didn't want me to file a bond claim is because they were *colluding to cover up FTB's and DOJ's criminal activities*. While Anna Barsegyan herself is not the one who committed the fraud, Anna Barsegyan was on the thread and thus a co-conspirator in the fraud perpetrated against me.

**Additional Exhibit to Support Claim that DOJ committed fraud
to hide my right to file a bond complaint:**

**Email Thread Between
Christine Grab and Department of Justice
dated December 5 – December 16, 2022
(4 pages)**