

CLAIMANT INFORMATION

LAST NAME GRAB		FIRST NAME Christine		MIDDLE INITIAL N.
INMATE OR PATIENT IDENTIFICATION NUMBER (if applicable)		BUSINESS NAME (if applicable)		
TELEPHONE NUMBER [REDACTED]		EMAIL ADDRESS [REDACTED]		
MAILING ADDRESS [REDACTED]		CITY San Diego	STATE CA	ZIP [REDACTED]
IS THE CLAIMANT UNDER 18 YEARS OF AGE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		INSURED NAME (Insurance Company Subrogation)		
IS THIS AN AMENDMENT TO A PREVIOUSLY EXISTING CLAIM? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		EXISTING CLAIM NUMBER (if applicable)	EXISTING CLAIMANT NAME (if applicable)	

ATTORNEY OR REPRESENTATIVE INFORMATION

LAST NAME		FIRST NAME		MIDDLE INITIAL
TELEPHONE NUMBER		EMAIL ADDRESS		
MAILING ADDRESS		CITY	STATE	ZIP

CLAIM INFORMATION

STATE AGENCIES OR EMPLOYEES AGAINST WHOM THE CLAIM IS FILED Anna Barsegyan - Department of Justice and	DATE OF INCIDENT 09-01-21
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LATE CLAIM EXPLANATION (Required, if incident was more than six months ago)

Grace Le Bleu - Franchise Tax Board

→ Late filing due to fraud, so limits do not apply

DOLLAR AMOUNT OF CLAIM \$100,000	CIVIL CASE TYPE (Required, if amount is more than \$10,000) <input type="checkbox"/> Limited (\$25,000 or less) <input checked="" type="checkbox"/> Non-Limited (over \$25,000)
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DOLLAR AMOUNT EXPLANATION
SEE Attached

INCIDENT LOCATION
San Diego, CA

SPECIFIC DAMAGE OR INJURY DESCRIPTION
SEE Attached - Public posting of social security numbers

CIRCUMSTANCES THAT LED TO DAMAGE OR INJURY
SEE Attached

EXPLAIN WHY YOU BELIEVE THE STATE IS RESPONSIBLE FOR THE DAMAGE OR INJURY

Both women were acting in their official capacities as CA state employees.

AUTOMOBILE CLAIM INFORMATION		
DOES THE CLAIM INVOLVE A STATE VEHICLE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	VEHICLE LICENSE NUMBER (if known)	STATE DRIVER NAME (if known)
HAS A CLAIM BEEN FILED WITH YOUR INSURANCE CARRIER? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	INSURANCE CARRIER NAME	INSURANCE CLAIM NUMBER
HAVE YOU RECEIVED AN INSURANCE PAYMENT FOR THIS DAMAGE OR INJURY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AMOUNT RECEIVED (if any)	AMOUNT OF DEDUCTIBLE (if any)

NOTICE AND SIGNATURE

I declare under penalty of perjury under the laws of the State of California that all the information I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code section 72).

SIGNATURE <i>C. Grabs</i>	PRINTED NAME Christine Grabs	DATE 12-19-2022
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- INSTRUCTIONS**
- Include a check or money order for \$25, payable to the State of California.
 - \$25 filing fee is not required for amendments to existing claims.
 - Confirm all sections relating to this claim are complete and the form is signed.
 - Attach copies of any documentation that supports your claim. Do not submit originals.
- Mail the claim form and all attachments to:
Office of Risk and Insurance Management
Government Claims Program
P.O. Box 989052, MS414
West Sacramento, CA 95798-9052
- Claim forms can also be delivered to:
Office of Risk and Insurance Management
Government Claims Program
707 3rd Street, 1st Floor
West Sacramento, CA 95605
1-800-955-0045

Department of General Services Privacy Notice on Information Collection

This notice is provided pursuant to the Information Practices Act of 1977, California Civil Code Sections 1798.17 & 1798.24 and the Federal Privacy Act (Public Law 93-579).

The Department of General Services (DGS), Office of Risk and Insurance Management (ORIM), is requesting the information specified on this form pursuant to Government Code Section 905.2(c).

The principal purpose for requesting this data is to process claims against the state. The information provided will/may be disclosed to a person, or to another agency where the transfer is necessary for the transferee-agency to perform its constitutional or statutory duties, and the use is compatible with a purpose for which the information was collected and the use or transfer is accounted for in accordance with California Civil Code Section 1798.25.

Individuals should not provide personal information that is not requested.

The submission of all information requested is mandatory unless otherwise noted. If you fail to provide the information requested to DGS, or if the information provided is deemed incomplete or unreadable, this may result in a delay in processing.

Department Privacy Policy
The information collected by DGS is subject to the limitations in the Information Practices Act of 1977 and state policy (see State Administrative Manual 5310-5310.7). For more information on how we care for your personal information, please read the DGS Privacy Policy.

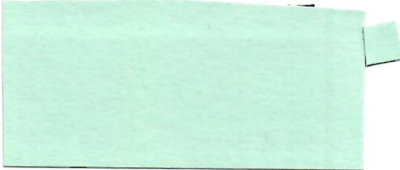
Access to Your Information
ORIM is responsible for maintaining collected records and retaining them for 5 years. You have a right to access records containing personal information maintained by the state entity. To request access, contact:

DGSORIM
Public Records Officer
707 3rd St., West Sacramento, CA 95605
(916) 376-5300

**Department of General Services
Office of Risk and Insurance Management
Government Claims Program**

Claimant:

Christine N. Grab,



Accused 1:

Anna Barsegyan
Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702 Los Angeles, CA 90013.

Accused 2:

Grace LeBleu
Senior Disclosure Specialist
Franchise Tax Board
9646 Butterfield Way, Sacramento, California 95827

Overview of Claim

On 09-01-2021, Anna Barsegyan, while acting in her official capacity as Deputy Attorney General representing the State of California, posted both my husband's and my full social security numbers on a public website on the Internet in violation of California Rules of the Court, Rule 1.201. Anna Barsegyan admits that she did this and claims it was "inadvertent." Whether it was intentional or not is moot; she has admitted to unlawful activity that has harmed me and my husband.

More concerning is that Ms. Barsegyan should not have had our private information in the first place. Grace LeBleu at the Franchise Tax Board unlawfully gave her this information in violation of California Government Code section 15705.

I believe that I qualify for an exception to the time limit rule because Franchise Tax Board and the Department of Justice hid my right to file this claim from me. I was led to believe that I had no administrative recourse, which I believe qualifies as committing fraud. My understanding is that there is not statute of limitations for claims when the cases involve fraud.

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 about the ORIM 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. This outright fraud was intended to stop me from exercising my right to file this claim, which takes this claim beyond a civil matter to a criminal matter: the DOJ has violated 18 US Criminal Code section §1001 and 18 USC §241.

I believe that one of the reasons that FTB and DOJ tried to hide my rights from me and used deception to try to trick me into not filing this claim once I found out that the right exists is because they are covering up *bona fide* criminal activity. Based on the following *prima facie* evidence, I believe that Anna Barsegyan and Grace LeBleu conspired to publicly post our private information to retaliate against me, harass me, threaten me and intimidate me into silence:

- Per California Government Code section 15705, Grace LeBleu should not have given Anna Barsegyan our social security numbers in the first place.
- Anna Barsegyan violated CCP 128.7 (c), which says the Motion cannot be filed until 21 days *after* it has been served. Anna Barsegyan served 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.
- Franchise Tax Board has a documented history of exposing social security numbers as a tool of harassment.

As stated above, even if the disclosure of my and my husband's social security numbers was "inadvertent" as Ms. Barsegyan claims, it doesn't change the fact that Ms. Barsegyan violated California Rules of the Court, Rule 1.201 and CCP 128.7 (c). Those full numbers were available online to any member of the public for more than two weeks. Thanks to tools such as The Wayback Machine, information can never truly be deleted from the internet. The damage is already done and cannot be reversed. That in and of itself is grounds for approving my claim.

Details of Claim:

Specific Damage/Injury and Circumstances Which Led to Damage/Injury

On 08-04-2014, claimant filed an Abatement Request (which means a request for refund of penalties, fees and interest) with FTB for tax year 2011. FTB denied claimant's Abatement Request, not just for 2011, but also for 2013 and 2014, even though no Abatement Request was filed for either of those years. I filed an appeal with the Board of Equalization (BOE) on 08-21-2017, which at the time was the administrative court that handled FTB Appeals. While my case was pending, the administration of FTB Appeals was moved from the BOE to the newly created Office of Tax Appeals (OTA). In November 2019, the OTA upheld FTB on the matter. On 01-29-2020, I filed a new appeal with San Diego Superior Court (SDSC) in accordance with A.B. 102 section 13, A.B. 131 section 14 and Cal Government Code section 15677. Deputy Attorney-General Anna Barsegyan represented FTB in the SDSC civil matter.

While I was auditing the records submitted by FTB in the OTA/SDSC court cases, I found two instances where FTB employees directed me to remit more money than the applicable billing stated was due. In both cases, the employees falsified FTB's internal records to make it appear that was the correct amount due. In both cases, their employer was the beneficiary of the criminal activities, so it appeared that each employee had conspired with FTB to overcharge me. Because the overcharge/falsification of records happened twice with two different employees, it appeared to be systematic.

On 07-22-2021, 07-23-2021 and 07-27-2021, I made California Public Records Requests from the Franchise Tax Board in which I requested the names, job titles, employee numbers and copies of the Oaths of Affirmation for several FTB employees (exhibit 1).

In the 07-22-2021 letter, I wrote “I am writing to request information on these two employees so that I can file formal criminal charges against them.” I included that line because I knew that it was FTB’s policy to not supply the names or employee numbers of the customer service representatives. As is reasonable, I explained why I needed to know the name of these people, and why, in this case, FTB was required to provide an exception to their policy of not disclosing employee names and ID numbers. FTB provided all of the information requested.

When I contacted the San Diego District Attorney’s office about the matter of FTB overcharging interest, the person I spoke with told me that step one in the bureaucratic system is to file a police report. I attempted to file a police report against the perpetrators on Sunday, 08-29-2021.

The day after I filed the police report, on Monday, 08-30-2021, Ms. Barsegyan made a reservation with the court for a Motion for Sanctions hearing. Two days later, on 09-01-2021, Ms. Barsegyan filed a Motion for Sanctions with the court (exhibit 2).

In her moving papers, Ms. Barsegyan did not redact my husband’s or my social security numbers from the letter dated 07-22-2021 that I had sent to the Disclosure Department (exhibit 3). The unredacted letter was submitted as part of the *Declaration of Grace LeBleu in support of FTB’s Motion for Sanctions*, which is a violation of the California Rules of the Court, Rule 1.201. Protection of Privacy, which states:

- (a) Exclusion or redaction of identifiers. To protect personal privacy and other legitimate interests, parties and their attorneys must not include, or must redact where inclusion is necessary, the following identifiers from all pleadings and other papers filed in the court's public file, whether filed in paper or electronic form, unless otherwise provided by law or ordered by the court: (1) Social security numbers. If an individual's social security number is required in a pleading or other paper filed in the public file, only the last four digits of that number may be used.

Furthermore, Anna Barsegyan also violated CCP 128.7 (c), which says the Motion cannot be filed until 21 days after it has been served. Anna Barsegyan served 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.

When I contacted Ms. Barsegyan about the exposure, she stated that the lack of redaction of the social security numbers was “inadvertent.” There is no excuse for Anna Barsegyan and Barsegyan’s paralegal to have failed to redact the social security numbers. There is no excuse for Anna Barsegyan nor Barsegyan’s paralegal to have violated CCP 128.7 (c). Ms. Barsegyan essentially claimed that she and her paralegal were grossly incompetent.

But the real question is why didn’t Grace LeBleu redact our social security numbers in accordance with California Government Code section 15705, which says:

Notwithstanding any other provision of law, unless prohibited by federal law, the Franchise Tax Board shall truncate social security numbers on lien abstracts and any other records created by the board that are disclosable under Chapter 3.5 (commencing with Section 6250) of Division 7 of Title 1 before disclosing the record to the public. For purposes of this section, “truncate” means to redact the first five digits of a social security number.

The specific purpose of giving the document to Anna Barsegyan was so that Ms. Barsegyan could file it with the court along with the *Declaration of Grace LeBleu in support of FTB’s Motion for Sanctions*, which Ms. LeBleu signed under penalty of perjury. Ms. LeBleu cannot argue that she was unaware of how the document was to be used.

Between my original case with the Office of Tax Appeals, the case in San Diego Superior Court, and other miscellaneous requests that I’ve made over the last few years, Grace LeBleu

had personally redacted more than 1,000 pages of documents with my and my husband's personal information on it. It is out of character for her to not redact social security numbers. Ms. LeBleu certainly cannot claim that she was unaware of the law requiring the document be redacted.

As stated above, I find it difficult to believe that three competent women who were all skilled at their jobs (Barsegyan, LeBleu and Barsegyan's paralegal) all made so many egregious "errors." I believe that Grace LeBleu and Anna Barsegyan conspired to publicly post our social security numbers in order to deter me from continuing to try to pursue legal recourse against the FTB collection agents who had overcharged me interest.

There is additional *prima facie* evidence, but because intent is a moot issue in this claim, I will not get into further details. I have included a copy of *Plaintiff Christine N. Grab's Memorandum of Points and Authorities in Opposition to Defendant's Motion for Sanctions* as exhibit (exhibit 4), which contains detailed information regarding all of the *prima facie* evidence. If you would like to see any of the evidence that was referenced in the *Opposition to Defendant's Motion for Sanctions*, I will happily provide it upon request.

Fraud Constitutes Late Claim Filing

FTB and DOJ led me to believe that I had no recourse other than a request for a Motion for Sanctions. I believe that not disclosing this avenue of recourse qualifies as committing fraud. My understanding is that there is no statute of limitations for claims when fraud is involved.

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 about the ORIM 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 (exhibit 5). This outright fraud was intended to stop me from exercising my right to file this claim, which takes this claim beyond a civil matter to a criminal matter: 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...”

Dollar Amount of Claim and Explanation

There is very real potential for identity theft as a result of Ms. Barsegyan's breach. While SDSC did eventually remove the social security numbers from its website, those numbers were available online to any member of the public for more than two weeks. Thanks to tools such as The Wayback Machine, information can never truly be deleted from the internet. Now that those numbers have been placed out in the public, the damage is already done and cannot be reversed. This concern has caused me and my husband anxiety – and will for the rest of our lives. The

potential cost is that someone utilizes the information posted online to assume my husband and my identities and steal our entire net worth.

I believe that the reason the State's Attorney General's office intentionally posted our social security numbers was to send a personal message to me and my husband to stop exposing FTB's unlawful behavior, or else more consequences would follow. And the delivery method made the permanence of that message clear. Because I have not stopped making allegations of corruption at FTB, my husband and I also have anxiety that FTB and DOJ will continue to retaliate and harass us for speaking out about the unlawful activities at FTB that were exposed in our court case.

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.

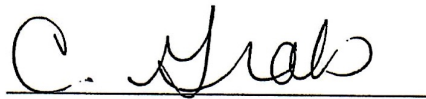
The purpose of the large award was to send a message. On appeal, the NV Supreme Court reduced the award amount to \$100,000 because of a Nevada state-specific law limiting government pay-outs. While the NV Supreme Court reduced the amount of the pay-out to comply with Nevada law, they upheld the intent of the lower court's award.

Since the NV Supreme Court established a precedent of \$100,000 in damages for emotional distress in a case that was similar to mine, I believe a request for \$100,000 for both me and my husband is fair. In my case, there is an added layer of emotional distress in the fact that it isn't only the FTB harassing me – the FTB and DOJ have conspired together to inflict harm. I

believe that the FTB and DOJ will likely attempt to do more harm if they are not punished for exposing our social security numbers.

Verification

I declare under penalty of perjury under the State of California that all of the information that I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading, I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code Section 72).

A handwritten signature in cursive script, appearing to read "C. Grab", is written over a horizontal line.

Christine N. Grab

December 19, 2022