

From: Christi Grab [REDACTED]
Subject: Re: Questions re: Complaint #21-O-14331 Against Anna Barsegyan
Date: March 9, 2023 at 12:43 PM
To: Kim, Roy [REDACTED]
Cc: cru@[REDACTED], [REDACTED], [REDACTED], [REDACTED]

CG

Mr. Kim:

The SDSC case concluded in March of 2022. The matters addressed in the Complaint against Anna Barsegyan go beyond the scope of that case.

I would like written acknowledgment that I made new allegations against Anna Barsegyan in the Complaint filed on December 19, 2022 that were not included in the original Complaint #21-O-14331. These allegations include federal criminal charges.

I would like an acknowledgement that those additional matters were not previously investigated in the first case, and that you have chosen to not investigate these matters for the second complaint that was filed.

Please, open a new Complaint with its own Complaint Number for the Complaint filed on December 19, 2022. Since you already told me it will be turned down, go ahead and send me a new turn down notice that specifically acknowledges ALL of the allegations that were filed, and in it state that you have chosen to not investigate the allegations that are different than the ones made in the original Complaint #21-O-14331.

Mr. Kim, I am not going to let you pretend that these additional criminal allegations were never filed. I will not tolerate these games to try to sweep the matters under the rug. The Bar Association needs to do its job. If the Bar want to turn down the allegations, that is fine. But you will not pretend that the allegations were never made.

Regards,

Christine Grab

On Mar 9, 2023, at 12:10 PM, Kim, Roy [REDACTED] wrote:

Good Evening,

The reasoning for keeping your case closed remains the same so a new complaint was not opened. Your complaint concerns issues that are best addressed by the courts. Let us know the outcome of your case.

If you dispute the closing of your complaint, please contact our Complaint Review Unit. You can also send us the results of your case and we can reconsider the closing based on findings of the court.

Thank you,

Roy Kim (he/his/him)
Trial Counsel, Office of Chief Trial Counsel
The State Bar of California | 845 S. Figueroa St. | Los Angeles, CA 90017
Phone: [REDACTED] | Fax: [REDACTED] | [REDACTED]

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From: Christi Grab [REDACTED]
Subject: Fwd: Questions re: Complaint #21-O-14331 Against Anna Barsegyan
Date: March 9, 2023 at 7:28 AM
To: [REDACTED]

CG

Begin forwarded message:

From: Christi Grab <[REDACTED]>
Subject: Questions re: Complaint #21-O-14331 Against Anna Barsegyan
Date: March 9, 2023 at 7:27:11 AM PST
To: "Kim, Roy" [REDACTED]
Cc: [REDACTED], [REDACTED], [REDACTED]

Mr. Kim:

On January 5, 2022, I wrote to you and told you that I had new charges to file against Anna Barsegyan. On January 6, 2022, you advised me to file a new complaint against her (see highlighted items in email thread below between me and you) instead of trying to add new charges to the old complaint.

On December 19, 2022, I filed the new complaint, which contained many new allegations against Ms. Barsegyan that had not been included in the original complaint #21-O-14331. Thousands of pages of evidence was included in order to substantiate these new allegations, along with thousands of pages of new and previously sent evidence that further supported the perviously made allegations.

On February 2, you issued a terse turn down for complaint #21-O-14331 on the grounds that "your recent correspondence provides no new evidence which would merit re-opening your complaint."

Question 1: Why was this treated as re-opening a previous complaint instead of opening a new complaint? I specifically requested a new complaint with the new charges, as you had advised me to do.

Question 2: Why did you fail to address the new charges that were included in the new complaint? The above referenced sentence does not indicate any acknowledgement of the new charges were made against Ms. Barsegyan.

I found this denial letter to be disturbingly vague. It appears to me that you are trying to sweep these new — and very serious — allegations under the rug by pretending that I never made them.

I request that the Complaint submitted on December 19, 2022 to be treated as new Complaint, that a new file is opened for this new Complaint, that a proper investigation be done regarding ALL charges presented in the new Complaint, and that when the investigation is completed, that the Bar issue a response letter which addresses their findings regarding ALL of the issues and supporting evidence that were brought forward, including:

Co-conspired to commit suborning perjury in violation of rule ABA rule 8.4(a)

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).

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 and ABA rule 8.4(g). In doing so, she also directed her client to violate California Government Code section 15705, so she yet again violated ABA rules 8.4 (a) and (c).

Numerous violations of American Bar Association rule 8.4(c), by "engage in conduct involving dishonesty, fraud, deceit or misrepresentation."

Numerous violations of rule 8.4(g) "engage in conduct that the lawyer knows or reasonably should know is harassment or discrimination"

Obstructed 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. 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).

Mr, Kim, your failure to acknowledge the new charges against Anna Barsegyan is unconscionable. It is shocking to me that someone who signed an Oath of Allegiance to serve the people of the State of California would try to ignore such malfeasance being done by an attorney under your jurisdiction — malfeasance not only against me, but against her client's own employees and the people of the State of California. I believe you have violated your Oath of Allegiance.

I now understand why the California State Auditor's Office has criticized the Bar Association so harshly for its lack of oversight of rogue attorneys. Given the terrible rebuking that the Bar recently received, I would have thought that the Bar would have made at least some effort to try to appear to care about the ethical conduct of its members.

I expect an acknowledgment of this letter and a timely answer as to whether or not a new Complaint will be opened of if I need to move forward with requesting that the Complaint Review Unit review the matter.

Regards,

Christine Grah
Pslam 64

Begin forwarded message:

From: "Kim, Roy" [REDACTED]
Subject: RE: Complaint #21-O-14331 Against Anna Barsegyan
Date: January 6, 2022 at 9:53:27 PM PST
To: Christi Grab [REDACTED]

Ms. Grab,

If the additional complaints are new, it is best if you file a new complaint.

Best,

Roy Kim (he/his/him)
Deputy Trial Counsel, Office of Chief Trial Counsel
The State Bar of California | 845 S. Figueroa St. | Los Angeles, CA 90017
Phone: [REDACTED] | fax: [REDACTED] | [REDACTED]

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From: Christi Grab <[REDACTED]>
Sent: Wednesday, January 5, 2022 3:18 PM
To: Kim, Roy <[REDACTED]>
Subject: Re: Complaint #21-O-14331 Against Anna Barsegyan

Hi Mr. Kim:

While working on the Complaint, I found MORE unlawful activity that I had previously missed. Thus I am adding more charges to the Complaint. I have requested additional evidence from FTB's Disclosure Department. It'll be two weeks before they respond, then I need more time to compile it. So it'll probably be another month before I file it.

If you need to close this file against Anna Barsegyan, that is fine. I can file the next Complaint as new charges against her, as opposed to additional evidence of the charges already set forth. Please advise.

Regards,

Christine Grab

On Dec 17, 2021, at 10:47 AM, Kim, Roy <[REDACTED]> wrote:

Ms. Grab,

It is fine to send emails in batches as allowed through email. You do not need to send exhibits 1-20.

Thank you,

Roy Kim (he/his/him)
Deputy Trial Counsel, Office of Chief Trial Counsel
The State Bar of California | 845 S. Figueroa St. | Los Angeles, CA 90017
Phone: [REDACTED] | fax: [REDACTED] | [REDACTED]

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From: Christi Grab <[REDACTED]>
Sent: Tuesday, December 14, 2021 10:46 AM
To: Kim, Roy <[REDACTED]>
Subject: Re: Complaint #21-O-14331 Against Anna Barsegyan

Hi Mr. Kim:

Thank you for confirming. On my end, my size limit for attachments is about 20 pages, so when I scan the package, I will scan it in batches of 20 pages each. Will that work for you? If not, then I will scan them in smaller batches. I just need to know what the limit is.

Also, in the second package, exhibits 1 - 20 are identical as the first package that I sent last month. Do you want me to send exhibits 1 - 20 again with the next package or will you recycle them from the first package?

Happy holidays,

Christine Grab

On Dec 13, 2021, at 9:30 PM, Kim, Roy
<[REDACTED]> wrote:

Good Evening Ms. Grab,

I am in receipt of your email. If you send emails with large files, there may be a data limit which would be the only limitations. All emails should get through to me.

Best,

Roy Kim (he/his/him)
Deputy Trial Counsel, Office of Chief Trial Counsel
The State Bar of California | 845 S. Figueroa St. | Los
Angeles, CA 90017
Phone: [REDACTED] | fax: [REDACTED]
[REDACTED]

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From: Christi Grab <[REDACTED]>
Sent: Sunday, December 12, 2021 5:03 PM
To: Kim, Roy <[REDACTED]>
Subject: Complaint #21-O-14331 Against Anna Barsegyan

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Kim:

I received your correspondence dated December 7, 2021, in which you stated that you had closed my complaint against Deputy Attorney-General Anna Barsegyan. You further stated that if I had any new facts or circumstances to address, to submit the information in writing to you.

As you are aware, in the Federal Criminal Complaint that I submitted along with my Bar Association complaint form, I stated that I had additional allegations against Ms. Barsegyan that would be addressed in a future Federal Criminal Complaint against her. I am still working on that second Federal Criminal Complaint. I hope to have it completed next week. When it is completed, I will copy you on it via email, as requested.

I have had issues with my emails being eaten by spam filters or going to junk mail boxes. Could you please confirm receipt of this email? Will you also white-list me so that when you get 20 emails from me with big attachments, they won't get lost in cyber-space filters?

Regards,

Christine Grab