

From: Christi Grab [REDACTED]
Subject: Request for Review of State Bar Case #23 O 13982
Date: June 5, 2023 at 9:15 AM
To: CRU cru@calbar.ca.gov
Cc: Kim, Roy [REDACTED]



Dear CRU Department:

On December 19, 2022, I filed a complaint with the Bar Association against Deputy Attorney General Anna Barsegyan on the grounds that:

"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)."

The charges included:

- 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*. 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
- 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).
- 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. 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.
- 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." A list of specific incidents of these violations was provided on pages 47 – 65 of the FCC.
- Anna Barsegyan improperly utilized the SDSC court system to obstruct justice by asking the

- 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).

Per the California Lawyers Association, "The Rules of Professional Conduct (the Rules), adopted by the Board of Trustees of the California State Bar and approved by the California Supreme Court, are intended to regulate the professional conduct of attorneys and establish the standards for purposes of attorney discipline... Once a complaint has been received by the State Bar, an attorney in the State Bar's Office of Chief Trial Counsel will conduct an initial review of the complaint to determine if it shows that the respondent attorney may have acted unethically in a manner that may subject the attorney to discipline... If... the initial review determines that the complaint does describe possible ethical violations that constitute grounds for discipline, the State Bar will assign the complaint for investigation by an attorney and an investigator in the State Bar's Office of Chief Trial Counsel. (<https://calawyers.org/california-lawyers-association/ethics-spotlight-the-attorney-disciplinary-system/>)

On February 2, 2023, Deputy Trial Counsel Roy Kim turned down the Complaint without actually opening a Complaint in the first place.

On March 16, 2023, Mr. Kim agreed to open a Complaint after I sent him an email stating "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.....Mr, Kim, your failure to acknowledge the new charges against Anna Barsegyan is unconscionable."

On April 21, 2023, Mr. Kim issued a letter stating that he would not conduct an investigation. In the letter, Mr. Kim never denied that I had provided sufficient evidence to warrant an investigation. As per the Bar's guidelines, an investigation should have been conducted and disciplinary action taken if she was found guilty.

However, Mr. Kim did not follow Bar protocol. Instead, in the turn down letter, Mr. Kim wrote "the court having jurisdiction over this matter is the appropriate venue for determining the facts and merits of the case." I have not found any Bar guidelines which state that the Bar Association is only required to "regulate the professional conduct of attorneys" in situations where the presiding judge determined that the lawyer behaved unethically.

Furthermore, nowhere in the letter did Mr. Kim cite the statutes, rules, regulations or by-laws of the State Bar Association that documents this claim that the Bar's responsibilities to "regulate the professional conduct of attorneys" are absolved if a case has a judge. I believe that failure to make such a citation indicates that Mr. Kim has provided a false basis for refusing to investigate.

I believe that Mr. Kim has committed two counts of the federal crime of Collusion to Cover Up Criminal Activities. The first count was refusing to open the complaint in the first place, the second count was refusing to investigate a matter that was -- by the Bar's own guidelines -- required to be investigated.

I am requesting a CRU review on the basis that Mr. Kim himself indicated that the allegations and evidence provided were sufficient to warrant an investigation to be conducted. As such, I expect CRU to promptly initiate a full investigation.

Since I have documented that ETR utilized Mr. Barsegyan's legal advice and services to further commit

Since I have documented that FTB utilized Ms. Barsegyan's legal advice and services to further commit crimes (such as FTB giving Anna Barsegyan our social security numbers so that Anna Barsegyan could post them on the internet, Anna Barsegyan advising her client to violate our California Taxpayer Rights to withhold evidence of crimes committed by FTB, etc), Ms. Barsegyan's attorney-client privilege with FTB is voided under the Crime-Fraud Exception Provision. Without attorney-client privilege, there is nothing to hinder a full and complete investigation into Anna Barsegyan's unethical and unlawful activities committed in order to cover up her client's unlawful activities.

I understand that the people in the Bar Association are employees of the State of California and that there is likely political pressure to cover up crimes that are being perpetrated by other State of California agencies. The judge in my case never denied the FTB and Anna Barsegyan committed these crimes; the judge simply pretended that the crimes never occurred. The judge is also a State of California employee. I believe that the reason the judge failed to acknowledge these crimes was because of this same political pressure.

As employees of the State of California, Bar Association Employees are civil servants who have sworn an oath to uphold Federal and State laws. The constituents of the State of California pay you a salary to protect us. The crimes being perpetrated by the California Franchise Tax Board are federal crimes being committed against every person who lives in the State of California. How can you allow your parents, children, neighbors, friends, etc to continue to be exploited? Anna Barsegyan set up fellow State of California employees as patsies. How can you allow your peers to be victimized? If you allow these evils to be perpetrated against others, these evils may very well happen to you, too. ***Please, do your job — protect your constituents and your peers.***

Finally, it would not surprise me if some of the evidence that I submitted has "disappeared." The Complaints and evidence package were originally submitted by USPS mail. The Bar Complaint is 8-pages long. There were 4-pages of evidence attached to the Bar Complaint. There was also a copy of the Federal Criminal Complaint that I filed with the FBI and Sacramento Grand Jury, which lays out the allegations against Anna Barsegyan in detail. The FCC is 68-pages long and has hundreds of pages of evidence attached to it. Attached to this email is the Table of Contents for the FCC evidence package. Please send me an email acknowledging that you have all pages of the Bar Complaint, the FCC, and the FCC evidence package. If any pages are missing, I will happily send them. I had also provided a copy of the final transcript for the SDSC Grab V FTB case to Mr. Kim via email. Please confirm that you have the transcript, as well.

If your guidelines allow you to review previous complaints as a part of the investigative process, I filed a complaint against Anna Barsegyan in 2021, Complaint case #21-O-14331. Just as with Complaint case #23 O 13982, Mr. Kim refused to open an investigation in response to Complaint 21-O-1433 on the grounds that since there was a judge on the case (which was still pending at the time), the Bar was absolved it's oversight duties.

I will be happy to send any other evidence that you may be interested in seeing; just let me know what you would like. I appreciate your attention to this matter and look forward to being interviewed by the Bar as a part of the investigation.

Regards,

Christine Grab