

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

1. I am a member of the Board of Directors (“Central Committee”) of ARF Dashnaktsutyun Western U.S.A., a California Mutual Benefit Corporation (“ARFDW”). ***I have been a member of ARFDW for nearly 40 years (since 1983) and I have been a member of the Central Committee since my election in 2016. I was re-elected to the Central Committee in 2018 and again in 2020.*** I have been ARFDW’s Chairwoman since July 1, 2018 and I am currently ARFDW’s Chief Executive Officer. I have first-hand, personal knowledge of the facts set forth in this Declaration, and if called to testify, could and would testify to the following facts.

2. ARFDW is a grassroots nonprofit institution formed to advance the rights, culture, heritage and interests of the Armenian community.

4. A true and correct copy of the operative Bylaws of ARFDW is submitted as **Respondents' Trial Exhibit 1.** (Various highlighting has been applied to each of the Exhibits to help facilitate the Court's review. The highlighting is not original to the Exhibits).

6. Every single member of the Central Committee of ARFDW is an unpaid volunteer.

8. Submitted as **Respondents' Trial Exhibit 2** is the most recent Statement of Information for ARFDW filed with the California Secretary of State.

10. As of December 2020, seventeen (17) official chapters subscribed to ARFDW, having

the following names, locations and member numbers:

- (i) Aharonian - Glendale, California (183);
- (ii) Aram Manoukian - Torrance, California (25);
- (iii) Armen Karo - Orange County, California (59);
- (iv) Zavarian - La Crescenta, California (139);
- (v) Lernavayr - Pasadena, California (184);
- (vi) Dro - Montebello, California (68);
- (vii) Rosdom - West San Fernando Valley, California (114);
- (viii) Aghbalian - Burbank, California (144);
- (ix) Karekin Njdeh - Hollywood, California (52);
- (x) Tehlirian - Fresno, California (51);
- (xi) Krisdapor - San Francisco, California (48);
- (xii) Arshavir Shiragian - North San Fernando Valley, California (143);
- (xiii) Ishkhan - Las Vegas, Nevada (19);
- (xiv) Sardarabad - San Jose, California (18);
- (xv) Serob Aghpure - Houston, Texas (15);
- (xvi) Papken Seuni - North Hollywood, California (74);
- (xvii) Kevork Chavoush - Phoenix, Arizona (14);

11. In addition to the foregoing Chapters, ARFDW has student members that each subscribe to student associations and organizations. The relationship of Student Associations to the ARFDW is set forth in Articles 38 and 39 of the Bylaws. One such association is the Shant Student Association (composed of 38 members). This group is colloquially referred to as a “Chapter” of ARFDW, but technically, under the ARFDW Bylaws, this group is not its own Chapter but prescribed the rights of a Gomideh (at least for all relevant purposes raised in the Petition). Accordingly, as it is not an independent Chapter, the Shant Student Association has no specific region or location.

12. As set forth in the Bylaws of ARFDW, Central Committee members are elected at a Regional Convention, which is generally held every 2 years. See Respondents’ Trial Exhibit 1, Articles 40 and 47.

1 13. Throughout ARFDW’s history, nominees for the Central Committee have always been
2 nominated at the Regional Convention.

3 14. Additionally, the Central Committee has always designated its Chairperson as the
4 Central Committee’s delegate at the Regional Convention, which I was, as of December 2020, before
5 the December 28, 2020 Regional Convention.

6
7 ***ARFDW Relationship with the ARF Bureau***

8 15. The ARFDW is an autonomous organization, which has a membership consisting of
9 Americans of Armenian heritage residing in the Western United States.

10 16. Part of the circumstances out of which the claims in the Petition arise relate to the nature
11 of the relationship (or lack thereof) between ARFDW, on the one hand, and the Armenian
12 Revolutionary Federation (or “ARF”), a political party organized under the laws of Armenia, and the
13 ARF Bureau (an executive body for the ARF), on the other hand.

14 17. The following is intended to provide context for the shared histories of the
15 organizations:

16 18. Beginning in 1915, the Armenian Genocide tragically resulted in the deaths of
17 approximately 1.5 million people in the Ottoman Turkish Empire. As a result, hundreds of thousands
18 of survivors were dispersed all over the world. Over the ensuing years, these individuals created and
19 organized what is referred to today as the Armenian Diaspora.

20 19. The Genocide was followed by decades of occupation over Armenia, with
21 approximately 3 million individuals living in Soviet Armenia, and as of today, approximately 8 million
22 Armenians living in the Diaspora.

23 20. The United States, and, more specifically, Southern California, was among one of the
24 primary locations in which Armenian nationals settled and in which Armenians developed the
25 Diaspora.

26 21. As Armenians fled political and religious persecution to locations throughout the world,
27 certain organizations concurrently developed within diasporic communities with the stated mission of
28 preserving Armenian community and heritage.

22. These organizations gained significant influence in the Armenian community, having served their roles for over 70 years (including from 1920 to 1991) as Armenia sought to regain its independence (from the Soviet Union) and thereafter.

23. One such organization, whose purpose was to coordinate amongst different groups of Armenians worldwide, was the Armenian Revolutionary Federation (or “ARF”).

24. Despite its partially similar name and shared ideals, the ARF and ARFDW are entirely separate entities.

25. In fact, to ensure the preservation of the necessary separation between these groups, the ARFDW has always relied on and held, as a fundamental tenet of the corporation “organizational decentralization” (as referenced multiple times in its Bylaws), which means that ARFDW, and each organization that shares a loose affinity with the ARF throughout the world, operates independently and according to its own laws.

26. Neither the Bureau nor the ARF has decision-making authority over the ARFDW.

27. Regrettably, however, this fundamental principle has recently been forgotten or disregarded by a number of self-interested individuals seeking to usurp control over the ARFDW for the benefit of the ARF and seek its favor.

28. The following chronology details intervention and meddling in the affairs of the ARFDW by the Bureau and others, which preceded and prompted the election that is in dispute in this matter.

Chronology

29. At the end of June/beginning of July 2018, the ARFDW held its 52nd Regional Convention, in which the following eleven (11) members were elected to the Central Committee, appointed with the following titles and responsibilities:

- i. Carmen Ohanian, Chairperson
- ii. Avedik Izmirlian, External Relations
- iii. Garo Ispendjian, Community Representative
- iv. Garo Madenlian, Gomideh Relations
- v. Levon Kirakosian, Secretary
- vi. Koko Topalian, Treasurer

- vii. Razmig Haroun, Advisor
- viii. Steve Dadaian, Advisor
- ix. Razmig Shirinian, Advisor
- x. Toros Kejajian, Advisor
- xi. Melkon Melkonian, Advisor

30. The election was subsequently memorialized in a Circular sent to the Chapters and the General Membership (sometimes referred to in correspondence as “ARF Gars Bodies and Ungers”), a true and correct copy of which is submitted as **Respondents’ Trial Exhibit 3**.

31. Following the election of the Central Committee in 2018, the ARFDW operated according to long-established routines.

32. However, in September 2019, the ARF Bureau began a campaign to try and exert control over the ARFDW and wrest it from the entity’s democratically elected Central Committee.

33. This began when the Bureau circulated an unprecedented correspondence, which caused great discord within the ARFDW and a splintering in the California-Armenian community.

34. In a letter, dated September 13, 2019, sent by the Bureau to the Central Committee, the Bureau purported to unilaterally appoint four (4) new members to ARFDW’s Central Committee, in addition to the existing 11-member Central Committee that were democratically elected in 2018.

35. Submitted as **Respondents’ Trial Exhibit 4** is a true and correct copy of the letter from the Bureau.

36. As set forth in the letter, these supposed “appointments” were:

- (i) Rostom Aintablian;
- (ii) **Petitioner Aida Dimejian;**
- (iii) Hrayr Garabetian; and,
- (iv) **Petitioner Stepan Boyajian**

37. Simultaneously, I received reports from various ARFDW members informing me that individual members and Chapters had also been notified of the supposed appointment.

38. The aforementioned letter and so-called appointment was not only concerning as it contravened the express terms of the ARFDW Bylaws, but, as detailed in the accompanying

1 declaration of Koko Topalian, contravened numerous prior representations previously made to the
2 Department of Justice around 2012 regarding the separation between the ARF and ARFDW.

3 39. However, as numerous members have long-standing relationships with the ARF
4 Bureau and the Central Committee recognized that a quarrel with the Bureau would result in
5 substantial disruption of the work of the ARFDW and create discord in its ranks, the Central
6 Committee elected to take the most practical approach to resolving this issue.

7 40. As a new election of the Central Committee was imminent and would render any
8 improper actions taken by the Bureau moot, the ARFDW Central Committee chose to proceed by
9 scheduling its Regional Convention for the earliest available date (at which a new Central
10 Committee would be elected making any appointment moot) and in the meantime, limited any
11 meaningful work of the Central Committee, to guard against any undue influence and in particular,
12 the participation of any of the so-called “appointed” Central Committee members in the operations
13 of ARFDW and the Central Committee.

14 41. Accordingly, Petitioners Boyajian and Dimejian were only allowed to participate in
15 discrete and limited activities until such time as the Regional Convention scheduled for 2020
16 commenced. To that end, they were not provided any material assignments nor were they placed
17 on any ARFDW subcommittees.

18 42. While Petitioners seem to have identified a singular “vote” in which they
19 participated in May 2020 (after the originally scheduled Regional Convention was postponed due
20 to COVID-19), the involvement of these individuals in the Central Committee was limited and I
21 cannot recall any other instance in which these individuals voted with the Central Committee.

22 23 **The Regional Convention**

24 43. The Central Committee issued numerous notices and correspondence to the
25 Chapters and Gomidehs of the ARFDW regarding efforts to hold a Regional Convention in 2020,
26 which often included deadlines for Chapter compliance (in selecting delegates in advance of the
27 Convention) as well as the proposed Regional Convention’s agenda.

28 44. For example, in January 2020, the Central Committee issued a circular to all

1 Chapters and members notifying them that a Regional Convention would be held commencing
2 April 30, 2020, attaching an Agenda, and instructing Chapters to hold General Regional
3 Assemblies (i.e., General Meetings of the Chapters) *before April 25, 2020* to select delegates.
4 Gomidehs for these Chapters were further instructed to “immediately notify the Central
5 Committee” of the dates selected for General Meetings to select delegates. A true and correct
6 copy of the January 9, 2020 letter sent by the Central Committee is submitted as **Respondents’**
7 **Trial Exhibit 5.**

8 45. Before the April 2020 Regional Convention could be convened, COVID-19 struck.

9 46. Accordingly, on March 24, 2020, the Central Committee issued a memorandum
10 informing ARFDW Chapters and the membership that, due to the pandemic, Chapter activities
11 requiring the use of physical centers and meetings would be suspended for two weeks, pending
12 further developments and the Regional Convention scheduled for April was also postponed. In the
13 meantime, the Central Committee would focus its efforts on engaging with the community and
14 providing a wide range of services to anyone in need or adversely impacted by the pandemic. A
15 true and correct copy of the memorandum from the Central Committee is submitted as
16 **Respondents’ Trial Exhibit 6.**

17 47. As a general matter, these notices and circulars from the Central Committee were
18 sent via email from the Central Committee’s email address (secretariat@arfwus.org) to a general
19 mailbox for the Gomidehs for each Chapter, which would then be recirculated to each Chapters’
20 members.

21 48. On October 8, 2020, due to improvements and trends surrounding the COVID-19
22 pandemic, the Central Committee issued a new circular, informing members and Chapters that the
23 Regional Convention was being rescheduled to commence on December 3, 2020. The letter also
24 detailed health and safety measures that would be taken. In the meantime, the Central Committee
25 noted that General Assemblies of the local Chapters (to select delegates) should resume and take
26 place *between October 19, 2020 and November 23, 2020* and that, in addition to holding meetings
27 in safe spaces, including outdoors, members who did not feel comfortable attending any meeting
28 should be considered excused from attending. In the same letter, the Central Committee also again

1 re-circulated the agenda for the Regional Convention. A true and correct copy of the letter is
2 submitted as **Respondents' Trial Exhibit 7**.

3 49. Over the next month, four additional circulars were sent to Chapters and members
4 relating to the Regional Convention.

5 50. Submitted as **Respondents' Trial Exhibits 8 and 9** are true and correct copies of two
6 letters sent by the Central Committee on November 18, 2020 and November 19, 2020.

7 51. As detailed therein, the letters instructed the Chapters that dates for all General
8 Assemblies to elect delegates were required to be set immediately and that the Chapters needed to
9 inform the Central Committee of the dates by no later than November 19, 2020. The letters further
10 instructed that meetings to select delegates occur *no later than December 1, 2020*, so that these
11 meetings could be held in advance of the Regional Convention scheduled for December 3, 2020.
12 *See Exs. 8 and 9.*

13 52. The Central Committee again included a copy of the agenda for the Regional
14 Convention. *See Ex. 8.*

15 53. The letters also included elaborate safety plans for holding meetings. *See Ex. 9.*

16 54. On December 1, 2020, the deadline set by the Central Committee for holding
17 General Meetings, several Chapters, including San Francisco and North Hollywood, in a
18 coordinated attempt to disrupt the scheduled Regional Convention, notified the Central Committee
19 they were not having meetings.

20 55. Submitted as **Respondents' Trial Exhibits 10 and 11** are true and correct copies of
21 emails from the North Hollywood and San Francisco Chapters.

22 56. As detailed in Exhibit 11, the notification from the San Francisco Chapter came
23 specifically from Petitioner Tazian. After purporting that the San Francisco Chapter had not met
24 due to various COVID-19 related issues, when asked if Tazian's Chapter had sought an exemption
25 from meeting in person or taken other measures to facilitate the selection of delegates, Tazian
26 merely responded that the Central Committee was aware of the cancellation and were notified.

27 57. Remarkably, while Tazian purported and continues to argue that his Chapter had
28 not convened based on the Central Committee's requirement that the Chapters meet in person, this

1 was actually an instruction specifically from the ARF Bureau (through its purported
2 representative, Viken Yacoubian), not the Central Committee. Submitted as **Respondents' Trial**
3 **Exhibit 12** is a true and correct copy of a letter from the ARF Bureau, sent on October 29, 2020,
4 containing these directions, which were contrary to the Central Committee's prior instructions that
5 anyone unable or unwilling to attend any meetings be deemed excused.

6 58. I was also informed around the deadline for selecting delegates, that the San Jose
7 Chapter convened a meeting but failed to select delegates, and the Burbank Chapter also tried to
8 meet but failed to have a Quorum. Accordingly, neither of these Chapters timely elected delegates
9 for the Regional Convention.

10 59. Two days later, on December 3, 2020, the day of the scheduled Regional
11 Convention, the Bureau purported to instruct the Central Committee that it was unilaterally
12 cancelling the Regional Convention, again throwing the ARFDW into disarray, as Chapters and
13 members received conflicting instructions and were uncertain how to proceed.

14 60. Submitted as **Respondents' Trial Exhibit 13** is a true and correct copy of the
15 December 3, 2020 correspondence from the Bureau.

16 61. As this caused further confusion and disrupted the ability of the ARFDW to
17 commence its Regional Convention, on December 3, 2020, the Central Committee circulated a
18 letter notifying the Chapters that certain Chapters had not met, as requested, and therefore, the
19 Regional Convention would again be postponed.

20 62. Submitted as **Respondents' Trial Exhibit 14** is a true and correct copy of the
21 December 3, 2020 letter sent from the Central Committee.

22 63. As reflected in the letter from the Central Committee, by the time of the Central
23 Committee's letter of December 3, 2020, a large majority of delegates had already been voted on
24 in accordance with the Central Committee's instruction, and, upon information and belief, this
25 was known to the ARF Bureau.

26 64. The Central Committee then attempted to reschedule the Regional Convention to a
27 date so all Chapters could conduct meetings and attend.

28 65. However, in the meantime, on December 27, 2020, the ARF Bureau issued a letter

1 directly to ARFDW's membership (circumventing the Central Committee) claiming to dissolve
2 the entire Central Committee and unilaterally appointing an entirely new Central Committee to
3 run the ARFDW without regard for the lack of any vote and in contravention of ARFDW's
4 Bylaws.

5 66. Submitted as **Respondents' Trial Exhibit 15** is a true and correct copy of the ARF
6 Bureau's December 27, 2020 letter.

7 67. In the letter, the ARF Bureau decreed that the new members of the Board (i.e.,
8 Central Committee) would be:

- 9 (i) Rostom Aintablian;
- 10 (ii) Knar Kitabjian;
- 11 (iii) Gev Iskajyan;
- 12 (iv) Hrayr Garabetian;
- 13 (v) Miganoush Melkonian;
- 14 (vi) Mkhitar Moradian;
- 15 (vii) Vicken Babikian;
- 16 (viii) Petitioner Stepan Boyajian;
- 17 (ix) Vicken Sosikian;
- 18 (x) Steve Dadaian; and,
- 19 (xi) Melkon Melkonian (missing in English translation)

20 68. The Bureau also sent a letter directly to these individuals purporting to confirm their
21 "appointments," a true and correct copy of which is submitted as **Respondents' Trial Exhibit 16**.

22 69. This new unlawful edict from the ARF Bureau led to further chaos within the
23 organization.

24 70. The Central Committee's goal throughout 2020 was to hold a Regional Convention
25 to elect the next Central Committee in accordance with the Bylaws. However, in hindsight, it is
26 obvious that the ARF Bureau was doing everything it could to prevent the ARFDW from holding
27 a Regional Convention so that it could improperly obtain control over the ARFDW.

28 71. Fearing a full-scale coup of the organization by the ARF Bureau, members of the
Central Committee immediately moved to convene an emergency meeting that same day,
December 27, 2020. I believed in good faith that an emergency meeting was necessary to avoid
an immediate takeover of the ARFDW by the ARF Bureau and its agents. I knew that the ARF
Bureau had no right to do what it was attempting to do and I was concerned that the ARF Bureau
intended to take the ARFDW's money and property for itself and it would be impossible to get it

1 back. I understood my obligation as an elected member of the Central Committee was to do my
2 best to prevent the ARF Bureau's blatant violation of the ARFDW's Bylaws and to protect the
3 ARFDW's rights and legal interests to the extent possible. As an unpaid volunteer without legal
4 training, I acted in good faith and did the best I could to address the situation properly and fairly.
5 I believe the actions of the Central Committee in calling the Regional Convention saved the
6 ARFDW and its members from an unlawful attempted coup and were proper.

7 72. Seven members of the eleven-member Central Committee attended the December
8 27, 2020 emergency meeting. This included the following members:

- 9 (i) Carmen Ohanian, Chairperson
- 10 (ii) Avedik Izmirlian
- 11 (iii) Garo Ispendjian
- 12 (iv) Levon Kirakosian
- 13 (v) Koko Topalian
- 14 (vi) Razmig Shirinian
- 15 (vii) Toros Kejajian

16 73. The four individuals the ARF Bureau had improperly purported to "appoint" to the
17 Central Committee in September 2019 were not invited to the emergency meeting because they
18 were not members of the Central Committee and were not entitled to notice. They were also not
19 invited because they were aligned with the ARF Bureau which had just initiated an attempt to
20 disband the elected Central Committee and appoint an entirely new imposter Central Committee.
21 Another member of the Central Committee who had been named by the ARF Bureau as part of its
22 new imposter Central Committee was also not invited to the emergency meeting due to their self-
23 evident conflict of interest. All properly elected members of the Central Committee who were not
24 actively engaged in an attempted coup of the ARFDW were given notice of the emergency Central
25 Committee meeting on December 27, 2020.

26 74. Submitted as **Respondents' Trial Exhibit 17** is a true and correct copy of minutes
27 from the December 27, 2020 meeting.

28 75. As reflected in the minutes, at all times the Central Committee worked in good faith
to attempt to preserve the interests of the organization, fearing disastrous consequences in the
Board did not take immediate and necessary action. The minutes reflect the genuine concern of

1 myself and the other members of the Central Committee and our realization of how far the ARF
2 Bureau was willing to go to obtain control of the ARFDW.

3 76. As further reflected in the minutes, at the meeting, the Central Committee members
4 unanimously voted that the Regional Convention would commence the following day, on
5 December 28, 2020. The Central Committee members then split duties to notify those Chapters
6 that had elected delegates (and not defied the Central Committee's prior instructions to hold
7 General Meetings to elect delegates) to attend.

8 77. On December 28, 2020, the ARFDW held its Regional Convention.

9 78. Submitted as **Respondents' Trial Exhibit 18** are true and correct copy of the minutes
10 from the Regional Convention.

11 79. As reflected in the minutes, the North Hollywood and San Francisco Chapters that
12 refused to elect delegates were not in attendance, nor were the Burbank and San Jose Chapters
13 that tried but were not able to select delegates (for lack of a Quorum or due to internal decisions
14 not to proceed).

15 80. While the Shant Student Association was notified and did select delegates, they then
16 advised the Central Committee that they would not be sending any delegates to attend the Regional
17 Convention (likely for fear of retribution by the Bureau).

18 81. Based on the foregoing and given that they did not have the right to attend the
19 Regional Convention (for other reasons explained in the accompanying declaration of Levon
20 Kirakosian), the Regional Convention commenced without their participation, and by authority of
21 the Central Committee under the Bylaws, it was determined that a Quorum existed.

22 82. More than 2/3 of the Chapters and Gomidehs that had elected delegates (and did not
23 abstain from attending) were present for the Regional Convention with more than a simple
24 majority of delegates present.

25 83. Specifically, as set forth in the Minutes, eleven (11) out of thirteen (13) Chapters
26 that had not refused or failed to select delegates and seven (7) of thirteen (13) potentially eligible
27 Gomidehs participated, with 39 delegates participating total (out of a possible 53 delegates total,
28 including the delegate provided to the Central Committee).

1 84. Respecting health concerns, the meeting was streamlined and conducted over the
2 course of a single day rather than the traditional 3-day meeting. However, as indicated in the
3 minutes, all of the necessary business of a Regional Convention was conducted at the Regional
4 Convention.

5 85. At the meeting, Central Committee members were nominated and a vote was
6 conducted, as has been the procedure at every prior Regional Convention of the ARFDW.

7 86. This resulted in a newly elected Central Committee composed of the following
8 members:

- 9 (i) Carmen Ohanian
- 10 (ii) Garo Ispendjian
- 11 (iii) Harut Mgrditchian
- 12 (iv) Koko Topalian
- 13 (v) Vahan Bezdikian
- 14 (vi) Alik Ourfalian
- (vii) Levon Kirakosian
- (viii) Toros Kejejian
- (ix) Sako Berberian
- (x) Shahen Derderian
- (xi) Arto Keuleyan

15 87. Following the vote, the ARFDW local chapters were informed of the new Central
16 Committee elections.

17 88. However, at the same time, the Bureau's unauthorized appointed "Central
18 Committee" (composed of former members of the Central Committee, including Steve Dadaian
19 and Melkon Melkonian, as well as Petitioner Boyajian) sent their own letter to ARFDW's
20 members (on December 31, 2020) attempting to confirm their appointment by the Bureau and
21 even attempted to give the individual chapters direction for conducting meetings amongst
22 themselves.

23 89. Submitted as **Respondents' Trial Exhibit 19** is a copy of a letter from the so-called
24 appointed Central Committee (which will henceforth be referred to as the "Imposter Central
25 Committee"), and which includes prior Bureau "appointee" Rostom Aintablian as Chairman and
26 Petitioner Stepan Boyajian as "intraorganizational liaison," purporting to inform the ARFDW
27 membership that they were the new duly elected Central Committee.

28 90. Regrettably, a slew of misconduct followed, demonstrating the reasonableness of

1 the ARFDW's Central Committee's concerns regarding the ARF Bureau.

2
3 **Imposter Effort to Excommunicate the Central Committee**

4 91. On January 3, 2021, the Imposter Central Committee, communicating with all
5 ARFDW Chapters and members, purported to "excommunicate" the entire recently
6 democratically elected Central Committee and persons rejecting the false assertions by the Bureau
7 that they had authority to simply appoint an entirely new Central Committee, according to fake
8 Bylaws.

9 92. Submitted as **Respondents' Trial Exhibit 20** is a true and correct copy of the January
10 3, 2021 letter from the Imposter Central Committee.

11
12 **Use of Fake Corporations to Steal Funds**

13 93. When that efforts failed, Declarant Daron Kachaturian and other members of the
14 Imposter Cenral Committee set up new fake corporations with conspicuously similar names to the
15 ARFDW to try and impersonate ARFDW (which included, as set forth below, stealing the funds
16 of ARFDW's affiliate, the Armenian Cultural Foundation) and soliciting the ARFDW's
17 membership and donors.

18 94. Submitted as **Respondents' Trial Exhibit 21** is a true and correct copy of Articles
19 filed with the California Secretary of State, on February 8, 2021, identifying the formation of a
20 new fake non-profit mutual benefit corporation with the name "Armenian Revolutionary
21 Federation WUSA, Inc.," designed to be conspicuously similar to ARFDW.

22 95. Submitted as **Respondents' Trial Exhibit 22** is a true and correct copy of a Statement
23 of Information for the fake corporation "Armenian Revolutionary Federation WUSA, Inc."
24 naming Daron Kachaturian as Chief Executive Officer and Rostom Aintablian as Secretary.

25 96. As set forth in the accompanying declaration of Arto Keuleyan, Secretary for
26 ARFDW's affiliate, the Armenian Cultural Foundation, on April 12, 2021, Petitioner Khatchig
27 Tazian facilitated the theft of \$100,000 from ARFDW's affiliate, the ACF, to facilitate the
28 operations of this newly formed corporation designed to compete with the ARFDW.

1 97. Simultaneously, on April 12, 2021, hundreds of thousands of dollars were also
2 stolen from ACF's other chapter banks accounts.

3 98. In fact, Petitioner Tazian submitted a declaration in the Federal RICO Action which
4 is pending in the U.S. Central District Court of California admitted to facilitating the theft. *See*
5 Keuleyan Decl. Ex. 2.

6
7 **Theft of Corporate Property**

8 99. Meanwhile, the newly formed fake corporation stole ARFDW's social media
9 profile and proceeded to impersonate the organization online.

10 100. The ARFDW's Facebook page was created on January 11, 2013, and has thousands of
11 followers.

12 101. In the beginning of January 2021, authorized users on the ARFDW Central Committee
13 were removed as administrators from ARFDW's Facebook account and soon after, it was clear that the
14 Facebook page had been taken over by the Imposter Central Committee.

15 102. As part of Facebook's corporate transparency rules, Facebook lists the corporate
16 organization making public statements in public Facebook profiles, and as of July 6, 2021, lists the
17 ARF Imposter Corporation, Armenian Revolutionary Federation WUSA, Inc., as the page's proprietor.

18 103. Submitted as **Respondents' Trial Exhibit 23** is a true and correct screenshot of the
19 Page Transparency section of the ARFDW Facebook account, taken as of July 6, 2021, stating that
20 ARFDW's stolen Facebook page is now managed by Armenian Revolutionary Federation WUSA, Inc.

21
22 **Threats of Harm**

23 104. As set forth in the accompanying declaration of Harut Mgrditchian, Central
24 Committee members were then sent threatening text messages.

25
26 **Fraud in the Courts**

27 105. As set forth in the Declaration of Viken Pakradouni submitted as **Respondents' Trial**
28 **Exhibit 24**, which Respondents request that the Court take judicial notice of pursuant to Evid. Code

1 452(d), in early 2020, the Imposter Corporation attempted to substitute itself for the ARFDW as the
2 beneficiary of a decedent's estate in an action pending in San Francisco Superior Court.

3
4 **Physical Violence and Intimidation**

5 106. As set forth in the accompanying declaration of Vahan Bezdikian, persons affiliated
6 with the ARF Bureau and the Imposter Central Committee concurrently physically disrupted
7 meetings of the ARFDW and harassed ARFDW members.

8
9 **Federal RICO Action**

10 107. In response to all of this misconduct, in early 2021, the ARFDW and its affiliate,
11 filed a Federal RICO Action in the U.S. District Court for the Central District of California [Case No.
12 2:21-CV-05594-DS-RAO]. A true and correct copy of the operative pleading is submitted as
13 **Respondents' Trial Exhibit 25.**

14
15 **Fake Regional Convention**

16 108. Then, in the summer of 2021, after Petitioners had filed this action, in an attempt to
17 try and legitimize the aforementioned misconduct, the Imposter Central Committee, spearheaded by
18 declarant Daron Kachatourian, convened their own so-called Regional Convention, and purported to
19 elect a new Central Committee, including Petitioners Stepan Boyajian, Khatchig Tazian, and Daron
20 Kachatourian.

21 109. Submitted as **Respondents' Trial Exhibit 26** is a true and correct copy of a social media
22 post from July 2021 wherein the Imposter Central Committee purported to have a "Regional
23 Convention."

24 110. Submitted as **Respondents' Trial Exhibit 27** is a true and correct copy of a social media
25 post to the Imposter Central Committee's website purporting to nominate a new Central Committee to
26 the ARFDW, including Petitioners Stepan Boyajian, Khatchig Tazian and declarant Daron
27 Kachatourian.

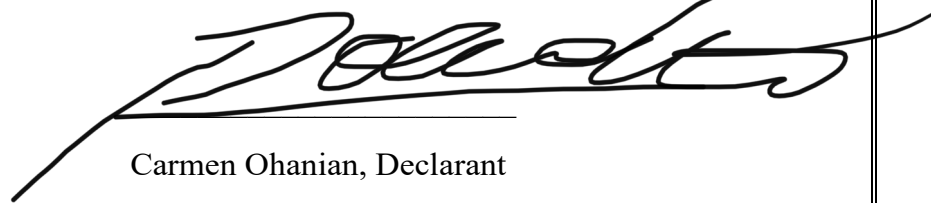
28 111. Astoundingly, in the Federal RICO Action, Declarant Daron Kachatourian even

1 submitted a declaration in which he admitted to coordinating the fake Regional Convention and
2 purporting to hold a “55th Regional Convention” of the ARFDW, albeit, confoundingly, in the
3 name of his newly formed corporation.

4 112. Submitted as **Respondents’ Trial Exhibit 28** is a true and correct copy of relevant
5 excerpts of that Declaration.

6
7
8 I declare under penalty of perjury pursuant to the laws of the State of California that the
9 foregoing facts are true and correct.

10
11 I am executing this Declaration on November 5, 2021 in Los Angeles, California.

12
13 
14 Carmen Ohanian, Declarant

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 85

21STCP01785

November 17, 2021

**AIDA DIMEJIAN, et al. vs ARMENIAN REVOLUTIONARY
FEDERATION - DASHNAKTSUTIUN WESTERN, U.S.A, A
CALIFORNIA MUTUAL BENEFIT NONPROFIT
CORPORATION, et al.**

8:30 AM

Judge: Honorable James C. Chalfant
Judicial Assistant: J. De Luna
Courtroom Assistant: C. Del Rio

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

For Petitioner(s): Donald Steven Cameron (Telephonic)

For Respondent(s): Brian Lauter (Video); Elan Bloch (Telephonic)

NATURE OF PROCEEDINGS: Status Conference

The matter is called for hearing.

Court and counsel confer regarding the briefing for trial (Corporation Code 709 hearing) currently scheduled for 11/23/2021.

The court notes that respondents have filed grossly oversized opposition briefs. Counsel are ordered to meet the requirements of California Rules of Court 3.1113(d) and 2.104.

Respondents are ordered to file a 15-page amended opposition brief or a consolidated 20-page brief, no later than 12/9/2021.

Any revised reply, limited to 10 pages, is to be filed and served no later than 01/05/2022.

Respondent is to lodge an amended trial notebook, evidence binders, and a memory stick containing the parties' briefs in editable Word format, no later than 01/11/2022.

As to the trial notebooks, counsel are ordered to remove documents in Armenian language.

Parties are ordered to reevaluate the evidence and remove documents that are unnecessary.

Parties are ordered to meet and confer after 12/9/2021 to resolve each and every evidentiary objection. Further, parties are to discuss the accuracy of the Armenian translations or file a declaration from an Armenian translator.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

Central District, Stanley Mosk Courthouse, Department 85

21STCP01785

November 17, 2021

**AIDA DIMEJIAN, et al. vs ARMENIAN REVOLUTIONARY
FEDERATION - DASHNAKTSUTIUN WESTERN, U.S.A, A
CALIFORNIA MUTUAL BENEFIT NONPROFIT
CORPORATION, et al.**

8:30 AM

Judge: Honorable James C. Chalfant

CSR: None

Judicial Assistant: J. De Luna

ERM: None

Courtroom Assistant: C. Del Rio

Deputy Sheriff: None

On the Court's own motion, the Hearing on Petition for Writ of Mandate scheduled for 11/23/2021 is continued to 01/18/2022 at 01:30 PM in Department 85 at Stanley Mosk Courthouse.

Notice is waived.