WV-116 Order on Request to Continue Hearing	Clerk stamps date here when form is filed.
Complete items 1 and 2 only.	FILED Superior Court of California County of Alameda
Petitioner (Employer): Berliner Cohen LLP	- 02/17/2022
Respondent: Robert Kiraly	Chad Flike , Executive Officer / Clerk of the Court  By: C. Dominguez Deputy
The court will complete the rest of this form	-
3 Next Court Date	Fill in court name and street address:
a. The request to reschedule the court date is denied.	Superior Court of California, County of Alameda
Your court date is:	Hayward Hall of Justice
(1) Any Temporary Restraining Order (form WV-110) already granted stays in full force and effect until the next court date.	24405 Amador Street Hayward, CA. 94544
(2) Your court date is not rescheduled because:	Fill in case number:
	Case Number:
	22CV005860
b. A Temporary Restraining Order (TRO) is still in full force and e  (1) The court extends the TRO previously granted on (date): 01/24  It now expires on (date): (If no date is listed, the TRO expires at the end of the court date  (2) The court changes the TRO previously granted and signs a new WV-110).	to the Respondent:  If 4 b is checked, a temporary restraining order has been issued against you. You must
c. Other (specify):	

### This is a Court Order.

* 2		Case Number: 22CV005860
Reason Court Date Is Resche  a. There is good cause to reschedu  (1) The petitioner has not se  (2) Other: Matter is to be	ile the court date (check one):	/004610, 21cv004608.
b. ☐ This is the first time that the res	spondent has asked for more time to prepare date on its own motion.	pare.
ė į		
6 Serving (Giving) Order to Oth	er Party	
The request to reschedule was made by	the:	
a. Petitioner (Employer)	b. Respondent	c. 🗹 Court
(1) You do not have to serve the respondent because they or their lawyer were at the court date or agreed to reschedule the court date.	(1) You do not have to serve the petitioner because they or their lawyer were at the court date or agreed to reschedule the court date.	(1) Further notice is not required.
(2) You must have the respondent personally served with a copy of this order and a copy of all documents listed on form WV-109, item 6, by (date):	(2) You must have the petitioner personally served with a copy of this order by (date):	(2) The court will mail a copy of this order to all parties by (date): 02/17/2022
(3) You must serve the respondent with a copy of this order. This can be done by mail. You must serve by (date):	(3) You must serve the petitioner with a copy of this order. This can be done by mail. You must serve by (date):	(3) Other:
(4) Other:	(4) Other:	

This is a Court Order.

WV-116, Page 2 of 3



		22CV005860	
7) No Fee to Serve (Notify) Respondent	✓ Ordered	☐ Not Ordered	
The sheriff or marshal will serve this order for free be	ecause:		
a.   The order is based on unlawful violence, a cred	dible threat of violence,	or stalking.	
b. $\square$ The person in $\textcircled{1}$ is entitled to a fee waiver.			
8   Other Orders			
FC 70			

Date: 02/17/2022

Bentrish Satarzadeh / Commissioner

Judicial Officer

13. Jatazacht

Case Number:



Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms.htm for *Request for Accommodations by Persons With Disabilities and Response* (form MC-410). (Civ. Code, § 54.8.)

#### Instructions to Clerk

If the hearing is rescheduled and the court extended, modified, or terminated a temporary restraining order, then the court must enter this order into CLETS or send this order to law enforcement to enter into CLETS. This must be done within one business day from the day the order is made.

#### -Clerk's Certificate-

Clerk's Certificate

I certify that this Order on Request to Continue Hearing (Temporary Restraining Order) (CLETS-TWH) (form WV-116) is a true and correct copy of the original on file in the court.

Date: FFB 1 1/ 2022

Clerk, by

This is a Court Order.

### WV-100

### **Petition for Workplace Violence Restraining Orders**

Read How Do I Get an Order to Prohibit Workplace Violence (form WV-100-INFO) before completing this form. NOTE: Petitioner must be an employer with standing to bring this action under Code of Civil Procedure section 527.8. Also fill out Confidential CLETS

be an employer with standing to bring this action under Code of Civil Procedure section 527.8. Also fill out Confidential CLETS Information (form CLETS-001) with as much information as you know.	County of Alameda 01/21/2022 at 05:42:18 PM
1 Petitioner (Employer)	By: Nicole Hall, Deputy Clerk
a. Name: Berliner Cohen, LLP	
is a corporation sole proprietorship  (specify): Limited Liability Partnership  and is filing this suit on behalf of the employee identified in item 2.	Fill in court name and street address:  Superior Court of California, County of Alameda  Hayward Hall of Justice
b. Lawyer for Petitioner (if any for this case) Name: Nancy J. Johnson State Bar No.: 111615 Firm Name: Berliner Cohen, LLP	24405 Amador Street Hayward, CA 94544
Date - 1 Add - GCd - GC - I - I - I - I - I	Court fills in case number when form is filed.
Petitioner's Address (If the petitioner has a lawyer, give the lawyer's information.)  c. Address: 10 Almaden Blvd., 11th Floor	Case Number: 22CV005860
Telephone: 408-286-5800 Fax: 408-998-5388  E-Mail Address: nancy.johnson@berliner.com  Employee in Need of Protection  Full Name: Christine H. Long  Sex: M K F Age: 49	
Respondent (Person From Whom Protection Is Sought) Full Name: Robert Kiraly	Age: 63
Address (if known): 2680 Fayette Drive, Apt. 311	
City: Mountain View State: CA	A Zip: 94040
Additional Protected Persons	
<ul> <li>a. Are you asking for protection for any family or household members of the employees at the employee's workplace or at other workplaces of the period of the per</li></ul>	
	Id Member? Relationship to Employee  No
	G □ No
☐ Additional protected persons are listed in Attachment 4a.	

Clerk stamps date here when form is filed.

**ELECTRONICALLY FILED** 

Superior Court of California,

This is not a Court Order.

b.		**************************************		
	Response is stated in Attachment 48 Respondent is stalking Employee. Also	b. o cyberstalking harassing and nu	hlishing wrong	oful accusations that
	Employee is a member of a Muslim-Jih			
R	elationship of Employee and Re	espondent		
a.	How does the employee know the response			n Attachment 5a.
	Employee is legal counsel for a third-p	arty corporation with an existing	TRO against R	Respondent.
h	Respondent is x is not a cur	rent employee of petitioner. (Exp	olain any decis	ion to retain terminate
υ.	or otherwise discipline the respondent)			Attachment 5b.
			SWEETERS IN	
V	enue			
	hy are you filing in this county? (Check	all that apply):		
44	[ m 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
a.	I he respondent lives in this county.			
			ner's employe	e in this county.
a. b. c.	☐ The respondent has caused physical	l or emotional injury to the petition	7 7	
b. с.	☐ The respondent has caused physical  ▼ Other (specify): Respondent's con  ther Court Cases	l or emotional injury to the petition duct is in retaliation to the TRO of	of Employee's	client in this county.
b. c.	☐ The respondent has caused physical  ☑ Other (specify): Respondent's con  Sther Court Cases  Has the employee or any of the persons	or emotional injury to the petition duct is in retaliation to the TRO of a named in 4 been involved in an	of Employee's	client in this county.
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's con  The Court Cases  Has the employee or any of the persons  ☐ No ☐ Yes If yes, check each k	I or emotional injury to the petition duct is in retaliation to the TRO of some some some some some some some some	of Employee's another court cannot when each i	se with the respondent?
b. с.	☐ The respondent has caused physical  ▼ Other (specify): Respondent's condition  The respondent has caused physical  Respondent's condition  The respondent condition  The respon	I or emotional injury to the petition duct is in retaliation to the TRO of some some some some some some some some	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☑ Other (specify): Respondent's con  Ither Court Cases  Has the employee or any of the persons  ☐ No ☑ Yes If yes, check each k	I or emotional injury to the petition duct is in retaliation to the TRO of some some some some some some some some	of Employee's another court cannot when each i	se with the respondent?
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  Ther Court Cases  Has the employee or any of the persons  ☐ No ☐ Yes If yes, check each kondition  Kind of Case  (1) ☐ Workplace Violence  (2) ☐ Civil Harassment	I or emotional injury to the petition duct is in retaliation to the TRO of some some some some some some some some	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  Therefore Court Cases  Has the employee or any of the persons ☐ No ☐ Yes If yes, check each kond of Case  (1) ☐ Workplace Violence (2) ☐ Civil Harassment (3) ☐ Domestic Violence	or emotional injury to the petition duct is in retaliation to the TRO of some and in 4 been involved in an artificial of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  ☐ The respondent has caused physical  ☐ Respondent's condition  ☐ The respondent has caused physical  ☐ Respondent's condition  ☐ No	or emotional injury to the petition duct is in retaliation to the TRO of some and in 4 been involved in an arrival of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if know
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  Therefore Court Cases  Has the employee or any of the persons ☐ No ☐ Yes If yes, check each kondered Case  (1) ☐ Workplace Violence (2) ☐ Civil Harassment (3) ☐ Domestic Violence (4) ☐ Divorce, Nullity, Legal Separate (5) ☐ Paternity, Parentage, Child Su	or emotional injury to the petition duct is in retaliation to the TRO of some and in 4 been involved in an arrival of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  Therefore Court Cases  Has the employee or any of the persons ☐ No ☐ Yes If yes, check each kook Kind of Case  (1) ☐ Workplace Violence (2) ☐ Civil Harassment (3) ☐ Domestic Violence (4) ☐ Divorce, Nullity, Legal Separation (5) ☐ Paternity, Parentage, Child Succession (6) ☐ Eviction	or emotional injury to the petition duct is in retaliation to the TRO of some and in 4 been involved in an arrival of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  ☐ The respondent has caused physical  ☐ Respondent's condition  ☐ The respondent has caused physical  ☐ Respondent's condition  ☐ The respondent has caused physical  ☐ Respondent's condition  ☐ No	or emotional injury to the petition duct is in retaliation to the TRO of some and in 4 been involved in an arrival of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  Therefore Court Cases  Has the employee or any of the persons ☐ No ☐ Yes If yes, check each is Kind of Case  (1) ☐ Workplace Violence (2) ☐ Civil Harassment (3) ☐ Domestic Violence (4) ☐ Divorce, Nullity, Legal Separation (5) ☐ Paternity, Parentage, Child Survey (6) ☐ Eviction (7) ☐ Guardianship (8) ☐ Small Claims	I or emotional injury to the petition duct is in retaliation to the TRO of some and in (4) been involved in an artificial of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ★ Other (specify): Respondent's condition  Therefore Court Cases  Has the employee or any of the persons  ☐ No ★ Yes If yes, check each keet Kind of Case  (1) ★ Workplace Violence (2) ☐ Civil Harassment (3) ☐ Domestic Violence (4) ☐ Divorce, Nullity, Legal Separation (5) ☐ Paternity, Parentage, Child Survivolence (6) ☐ Eviction (7) ☐ Guardianship (8) ☐ Small Claims (9) ☐ Postsecondary School Violence	I or emotional injury to the petition duct is in retaliation to the TRO of some and in (4) been involved in an artificial of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  ☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  ☐ The respondent has caused physical  ☐ Court Cases  ☐ Has the employee or any of the persons ☐ No ☐ Yes If yes, check each kond of Case  ☐ Implication ☐ Civil Harassment ☐ Implication ☐ Divorce, Nullity, Legal Separate ☐ Divorce, Nullity, Legal Separate ☐ Implication ☐ Implication ☐ Guardianship ☐ Guardianship ☐ Small Claims ☐ Postsecondary School Violence ☐ Implication ☐ Criminal	I or emotional injury to the petition duct is in retaliation to the TRO of some and in (4) been involved in an artificial of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if know
b. с.	☐ The respondent has caused physical  ★ Other (specify): Respondent's condition  Therefore Court Cases  Has the employee or any of the persons  ☐ No ★ Yes If yes, check each keet Kind of Case  (1) ★ Workplace Violence (2) ☐ Civil Harassment (3) ☐ Domestic Violence (4) ☐ Divorce, Nullity, Legal Separation (5) ☐ Paternity, Parentage, Child Survivolence (6) ☐ Eviction (7) ☐ Guardianship (8) ☐ Small Claims (9) ☐ Postsecondary School Violence	I or emotional injury to the petition duct is in retaliation to the TRO of some and in (4) been involved in an artificial of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if kno
b. с.	☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  ☐ The respondent has caused physical  ☐ Other (specify): Respondent's condition  ☐ The respondent has caused physical  ☐ Court Cases  ☐ Has the employee or any of the persons ☐ No ☐ Yes If yes, check each kond of Case  ☐ Implication ☐ Civil Harassment ☐ Implication ☐ Divorce, Nullity, Legal Separate ☐ Divorce, Nullity, Legal Separate ☐ Implication ☐ Implication ☐ Guardianship ☐ Guardianship ☐ Small Claims ☐ Postsecondary School Violence ☐ Implication ☐ Criminal	I or emotional injury to the petition duct is in retaliation to the TRO of some and in (4) been involved in an artificial of case and indicate where an Filed in (County/State)  Alameda, CA	nother court cannot when each we Year Filed	se with the respondent?  was filed:  d Case Number (if known)

			Case Number:
		on of Respondent's Conduct	
Re	-	ent has (check one or more):	
(1)	( Carrier )	Assaulted, battered, or stalked the employee	
(2)	X	Made a credible threat of violence against the employee been engaging in a course of conduct that would place a reason safety of his or her immediate family.	
On	e or n	nore of these acts (check either or both):	
(1)	X	Took place at the employee's workplace	
(2)		Can reasonably be construed to be carried out in the future	e at the employee's workplace
Ad		of workplace: 10 Almaden Blvd., 11th Floor, San Jose, CA	
wh	o did Resp	what happened. (Provide details; include the dates of all in what to whom; identify any witnesses): sonse is stated in Attachment 8c.	ncidents beginning with the most recent; tel
	Pie	case see Attachment oc.	
	-		
	-	No.	
	-		
	-		
	-		
	-	W-07-11-11-11-11-11-11-11-11-11-11-11-11-11	
	_		
		employee harmed or injured? Yes X No (If younge is stated in Attachment 8d.	es, describe harm or injuries):
		respondent use or threaten to use a gun or any other weapon	n? Yes 🗷 No (If yes, describe):
-			
159V			

Revised January 1, 2018

-							
(8)	f.	For	any of the incidents described above, did the	police	com	ne? 🗆 Y	es ⊠ No ☐ I don't know
O		If ye	es, did the employee or the respondent receiv	e an E	nerg	ency Prote	ctive Order?
		☐ Y	Yes No I don't know es, the order protects (check all that apply):	** Fr	eme	ont Police ation into	Department has an open Mr. Kiraly - Case No. 211209028 *
		w.Found	the employee		On	e or more o	of the persons in 4.
			the orders you want ☑ sonal Conduct Orders				
(9)	I a	sk the	court to order the respondent <b>not</b> to do any cted listed in <b>(4)</b> :	of the	follo	wing thing	s to the employee or to any person to
	a.		Harass, intimidate, molest, attack, strike, stalk ersonal property of, or disturb the peace of the			assault (sex	cually or otherwise), hit, abuse, destroy
	b.		Commit acts of unlawful violence on or make			violence to	the person.
	c.	X F	follow or stalk the person during work hours	or to o	r fro	m the place	e of work.
	d.	te	Contact the person, either directly or indirectle elephone, in writing, by public or private maither electronic means.				
	e.	X E	Inter the person's workplace.				
	f.		Other (specify):  As stated in Attachment 9f.  Contact any employees of Petitioner or employees.	oyees'	fami	ly members	s.
			Threaten the safety or privacy of the protecte				
		-	ncourage others to threaten the safety or priv				
		-0	Create any websites using the name and liker	iess of	Peti	tioner, its e	mployees, or its employees' family.
			ondent will be ordered not to take any action we court finds good cause not to make the ord		the	addresses (	or locations of any protected person
(10)	St	ay-A	way Order				
	a.	I ask	the court to order the respondent to stay at le	east	10	00 yar	ds away from (check all that apply):
		(1) [	The employee.	(8)	X T	he employe	ee's vehicle.
		(2) [	The other persons listed in (4).	(9) [	] 0	ther (specij	(b)):
		(3) [	The employee's workplace.		-		
		(4) [	▼ The employee's home.		-		<del>The state of the </del>
		(5) [	▼ The employee's school.			AND THE SPECIAL PROPERTY OF TH	
		(6)	The school of the employee's children.				
		(7) [	The place of child care of the employee's children.				

This is not a Court Order.



0		If the court orders the respondent to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job?  X Yes No (If no, explain):  Response is stated on Attachment 10b.
1)	Gu	ns or Other Firearms and Ammunition
	Doe	es the respondent own or possess any guns or other firearms?  Yes No I don't know
	rece in ej	te judge grants a protective order, the respondent will be prohibited from owning, possessing, purchasing, viving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is ffect. The respondent will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun ler, any guns or firearms within his or her immediate possession or control.
2	লে 1	Temporary Restraining Order
9	I red	quest that a Temporary Restraining Order (TRO) be issued against the Respondent to last until the hearing. I am senting form WV-110, Temporary Restraining Order, for the court's signature together with this Petition.
		the Respondent been told that you were going to go to court to seek a TRO against him/her?  Yes No (If you answered no, explain why below):
		Reasons are stated in Attachment 12.
	Res	pondent is stalking Employee. Respondent has unlawfully used Employee's name and likeness to create an
		il address in her name, and is emailing her family members requesting intimate information about Employee,
		g that he has her permission to do so. Respondent is cyberstalking and defaming Employee via emails and
	crea	tted a website unlawfully using Employee's name and likeness - where Respondent wrongfully alleges
		ployee is an integral member of a Muslim-Jihadi terrorist group and organized crime ring and has published her
	resi	dential address, contact, and picture, inciting violence against her in the workplace and at her home.
_		
		Request for Less Than Five Days' Notice of Hearing
		must have your papers personally served on the respondent at least five days before the hearing, unless the
		rt orders a shorter time for service. (Form WV-200-INFO explains what is proof of personal service. Form
		200, Proof of Personal Service, may be used to show the court that the papers have been served.)
	_	ou want there to be fewer than five days between service and the hearing, explain why:
	S. Albah	Reasons are stated in Attachment 13.
		court has a hearing scheduled for 2-17-22 at 9:00am in Dept. 519, regarding Respondent's TRO protecting
		ployee's client (21CV004608). Respondent began stalking, cyberstalking, and harassing Employee upon
		ning of Employee's client's TRO filing against Respondent. Employee's instant request for TRO should be heard
3		e same hearing, and Employee therefore requests and order shortening time for service so this court may hear requests for TROs restraining Respondent on 2-17-22.
		radilacte for TV/ le rectraining Vernandant on 7.17.77

Case Number:

This is not a Court Order.

the employee, or acted or spoken in a manner that has placed the employee in reasonable fear of violence.

I ask the court to order the sheriff or marshal for orders is based on a credible threat of viol	to serve the respondent with the others for free because this request ence or stalking.
☑ Court Costs	
I ask the court to order the respondent to pay	my court costs.
■ Additional Orders Requested	
I ask the court to make the following addition	al orders (specify):
☐ Additional orders requested are stated in A	Attachment 17.
(1) Instruct by order of the court to remove ar	ny and all websites and publications related to Berliner Cohen,
	ther employees of Berliner Cohen, LLP and their family members.
(2) Cease sending communications that in any	y manner relate to Berliner Cohen, LLP and its employees.
Number of pages attached to this form, if any  Date: Junuary 21, 2022	
Number of pages attached to this form, if any	
Number of pages attached to this form, if any Date: Junuary 21, 2022	
Number of pages attached to this form, if any Date: Suncy J. 2022 Nancy J. Johnson Lawyer's name (if any)	: 52  Lawyey's signalure
Number of pages attached to this form, if any Date: Suncy J. 2022 Nancy J. Johnson Lawyer's name (if any)	
Number of pages attached to this form, if any  Date:	: 52  Lawyey's signalure
Number of pages attached to this form, if any  Date: Sundly 21, 2022  Nancy J. Johnson  Lawyer's name (if any)  I declare under penalty of perjury under the laall attachments is true and correct.	: 52  Lawyey's signalure

Case Number:

## Attachment 7b to WV-100

	Temporary F	Restraining Order	
a. Name: F	(Employer) remont Toyota or Petitioner (if any, for the	is case):	FILED Superior Count of California County of Alameda 12/23/2021
Name: C	Christine Heather Lon ie: Berliner Cohen LL	g State Bar No.: 199676	By: Alisha McCorvel
Address:	10 Almaden Blvd 11		
City: Sa		State: CA Zip: 95113	Fill in court name and street address:  Superior Court of California, County of
	: (408) 286-5800	Fax: 408-998-5388	Alameda
AATTON CONTRACTOR AND A	idress: christine.long@		Hayward Hall of Justice
Employee	(Protected Person) Mark Hashimi	gooninor.com	- 24405 Amador Street Hayward, CA. 94544
uras su	A CONTRACTOR OF THE CONTRACTOR		Court fills in case number when form is filed.
	nt (Restrained Perso Robert Kiraly	on)	Case Number: 21CV004608
Sex: M	F Height:	Weight: Date	of Birth:
Hair Color:	Eye (		
Home Addre	ess (if known): 4546 EI (	Camino Real Suite B10	
City: Los A	Entertain Control of the Control of	Stat	e: CA Zip: 94022
Relationship	to Employee: Agent of	former disgruntled customer	*
In addition to	the employee, the following indicated below:  Full Name  lashimi Campos	30.	☐ No Spouse
Katheryn H			
Katheryn H			
Katheryn H		☐ Yes ☐ Yes	
☐ Additional	I protected persons are list		No chment 4.

Case	Number:
	21CV004608

#### To the Respondent:

an be
or :
or !
or :
or :
1
n, by
as :
T
ety or
lat <b>epi</b> nail
1
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h

b. This stay-away order does not prevent you from going to or from your home or place of employment.

This is a Court Order

(4) The employee's home(5) The employee's school

(6) The employee's children's school

		21CV004608			
(8)	No Guns or Other Firearms and Ammunition				
	<ul> <li>You cannot own, possess, have, buy or try to buy, receive or try to refirearms, or ammunition.</li> </ul>	ceive, or in any other way get guns, other			
	<ul> <li>b. You must:         <ul> <li>(1) Sell to or store with a licensed gun dealer or turn in to a law enforcement agency any guns or other firearms in your immediate possession or control. This must be done within 24 hours of being served with this Order.</li> </ul> </li> </ul>				
	(2) File a receipt with the court within 48 hours of receiving this Or have been turned in, sold, or stored. (You may use Form WV-800 Stored for the receipt.)				
	c.   The court has received information that you own or possess a fire	arm.			
(9)	Other Orders				
©	☐ Not Requested ☑ Denied Until the Hearing ☐ ☐ Request for broad prior restraint of online speech by Response	Granted as Follows (specify): indent is denied until the hearing.			
	Additional orders are attached at the end of this Order on Attachmen	t 9.			
	To the Petitioner:				
_					
10	Mandatory Entry of Order Into CARPOS Through CLETS  This Order must be entered into the California Restraining and Protective California Law Enforcement Telecommunications System (CLETS). (Cl.	Order System (CARPOS) through the			
	a. The clerk will enter this Order and its proof-of-service form into	CARPOS.			
	<ul> <li>b.    ☐ The clerk will transmit this Order and its proof-of-service form to into CARPOS.</li> </ul>	a law enforcement agency to be entered			
	c. Dy the close of business on the date that this Order is made, the employer or the employer's lawyer should deliver a copy of the Order and its proof-of-service form to the law enforcement agencies listed below to enter into CARPOS:				
	Name of Law Enforcement Agency	dress (City, State, Zip)			
	Additional law enforcement agencies are listed at the end of	this Order on Attachment 10			
_	Additional law enforcement agencies are listed at the end of this Order on Attachment 10.				
(11)	No Fee to Serve (Notify) Restrained Person	ered  Not Ordered			
	The sheriff or marshal will serve this Order without charge because:  a.   The Order is based on a credible threat of violence or stalking.	u.			
	<ul> <li>a.  The Order is based on a credible threat of violence or stalking.</li> <li>b.  The petitioner is entitled to a fee waiver.</li> </ul>	of contraction			
	and the second s	er al de aven			
	This is a Court Ordet.				

Case Number:

3			Case Number: 21CV004608	
	Lell M. Com			
12	Number of pages attached to this Order, if any:			
	Date:	12/23/2021	K. Evans / Judge	
			Judicial Officer	

### Wannings and Notices to the Restrained Person in @

#### You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get guns, other firearms, or ammunition while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to or store with a licensed gun dealer or turn in to a law enforcement agency any guns or other firearms that you have or control as stated in item (8) above. The court will require you to prove that you did so.

#### Notice Regarding Nonappearance at Hearing and Service of Order

If you have been personally served with this Temporary Restraining Order and Form WV-109, Notice of Court Hearing, but you do not appear at the hearing either in person or by a lawyer, and a restraining order that is the same as this Temporary Restraining Order except for the expiration date is issued at the hearing, a copy of the order will be served on you by mail at the address in item (3).

If this address is not correct or you wish to verify that the Temporary Restraining Order was converted into a restraining order at the hearing without substantive change, or to find out the duration of the order, contact the clerk of the court.

#### After You Have Been Served With a Restraining Order

- · Obey all the orders.
- Read Form WV-120-INFO, How Can I Respond to a Petition for Orders to Stop Workplace Violence?, to learn how to respond to this Order.
- If you want to respond, fill out Form WV-120, Response to Petition for Workplace Violence Restraining Orders,
  and file it with the court clerk. You do not have to pay any fee to file your response if the petition claims that you
  threatened violence against or stalked the employee, or placed the employee in reasonable fear of violence.
- You must have Form WV-120 served on the petitioner or the petitioner's attorney by mail. You cannot do this yourself.
   The person who does the service should complete and sign Form WV-250, Proof of Service of Response by Mail. File the completed proof of service with the court clerk before the hearing date or bring it with you to the hearing.
- In addition to the response, you may file and have declarations served, signed by you and other persons who have personal knowledge of the facts. You may use Form MC-030, Declaration, for this purpose. It is available from the clerk's office at the court shown on page 1 of this form or at www.courts.ca.gov/forms. If you do not know how to prepare a declaration, you should see a lawyer.
- Whether or not you file a response, you should attend the hearing. If you have any witnesses, they must also go to the hearing.
- At the hearing, the judge can make restraining orders against you that last for up to three years. Tell the judge why you disagree with the orders requested.

This is a Court Order

Temporary Restraining Order (CLETS-TWH)
(Workplace Violence Prevention)

WV-110, Page 4 of 5

#### Instructions for Law Enforcement

**Enforcing the Restraining Order** 

This order is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Restraining and Protective Orders System (CARPOS). Agencies are encouraged to enter violation messages into CARPOS. If the law enforcement agency has not received proof of service on the restrained person, the agency must advise the restrained person of the terms of the order and then must enforce it. Violations of this order are subject to criminal penalties.

Start Date and End Date of Orders

This order starts on the date next to the judge's signature on page 4. The order ends on the expiration date in item 5 on page 1.

If the Protected Person Contacts the Restrained Person

Even if the protected person invites or consents to contact with the restrained person, this order remains in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The order can be changed only by another court order. (Pen. Code, § 13710(b).)

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued, the orders must be enforced according to the following priorities: (See Pen. Code, § 136.2, Fam. Code, §§ 6383(h)(2), 6405(b).)

- 1. EPO: If one of the orders is an Emergency Protective Order (form EPO-001) and is more restrictive than other restraining or protective orders, it has precedence in enforcement over all other orders.
- 2. No Contact Order: If there is no EPO, a no-contact order that is included in a restraining or protective order has precedence over any other restraining or protective order.
- Criminal Order: If none of the orders includes a no contact order, a domestic violence protective order issued in a
  criminal case takes precedence in enforcement over any conflicting civil court order. Any nonconflicting terms
  of the civil restraining order remain in effect and enforceable.
- Family, Juvenile, or Civil Order: If more than one family, juvenile, or other civil restraining or protective order
  has been issued, the one that was issued last must be enforced.

(Clerk will fill out this part.)
—Clerk's Certificate—

Clerk's Certificate

I certify that this Temporary Restraining Order is a true and correct copy of the original on file in the court.

, Deputy

This is a Court Order

Temporary Restraining Order (CLETS—TWH)
(Workplace Violence Prevention)

WV-110, Page 5 of 5

Revised January 1, 2017

## Attachment 8c to WV-100

#### Attachment 8c to Petitioner for Workplace Violence Restraining Order (WV-100)

The Protected Person, Christine H. Long, is an attorney and Partner at Berliner Cohen, LLP. In or around December 2021, Ms. Long in her capacity as an attorney was consulted regarding Workplace Violence Restraining Orders in Alameda County to restrain Respondent, Robert Kiraly (aka Old Coder), and Brian Martin, believed to be working with Mr. Kiraly, from cyberstalking, harassing, threatening, defaming, and disseminating anti-Muslim hate speech to incite violence against her client, Fremont Toyota and its employees including its General Manager, Mark Hashimi (please see TROs issues December 23, 2021, in case numbers 21CV004608 and 21CV004610). Ms. Long's requests for WV-TROs on behalf of her client were both granted in part (with the court changing in part the restrictions on the website restraining orders), and are both scheduled to be heard on February 17, 2022, at 9:00am in Department 519 of the Hayward Hall of Justice.

Shortly after Ms. Long's client's TROs were granted by this court, and service was effectuated upon Brian Martin, Mr. Kiraly began stalking Ms. Long. Mr. Kiraly has created several email addresses unlawfully using the name and likeness of Ms. Long and her colleagues (e.g., me@christinelong.attorney). Mr. Kiraly has used misleading email addresses to send over 65 emails that appear to be sent by Ms. Long, to Ms. Long's family members, her colleagues, and her colleagues family members requesting the recipients respond by providing intimate and personal details about Ms. Long including who she is married to, information about her activities, and relationships to Mr. Kiraly under the ruse that he is soliciting this information with Ms. Long's permissions for a book he is writing. See Exhibit A and F.

Mr. Kiraly further retaliated against Ms. Long, by launching a cyberattack against her and Berliner Cohen, LLP, publicly and falsely accusing her of being part of a Muslim Jihadi terrorist group. In less than a week, his cyberattack includes sending over 65 threatening emails (to Ms. Long, her family members, her colleagues, and her colleagues' family members), creating a website using her name a likeness to harass and defame her, and boasting about the thousands of people he intends to spread false information to about her electronically and via mail. See **Exhibits** B-H.

Mr. Kiraly has unlawfully used Ms. Long's name and likeness to create at least one website that we are aware of, <a href="https://christinelong.attorney">https://christinelong.attorney</a>, to defame, threaten, and harass Ms. Long. Please see a PDF of the abovementioned website attached hereto as <a href="Exhibit B1">Exhibit B1</a>. On said website, Mr. Kiraly has listed residential addresses for Ms. Long, personal email addresses, description of a vehicle that he believes belongs to her (which it doesn't), discussions regarding her alleged family members and his beliefs regarding her parents, her siblings and related private personal information. We are informed and believe that he has acted with the assistance of Brian Martin, who is a licensed private investigator who would have access to the private information and is obtaining it in violation of the rights conferred upon him. Mr. Kiraly has stated he is distributing Ms. Long's photograph to various individuals along with his claims she supports Jihadi terrorists, clearly with an intent to incite individuals to act against her.

<sup>&</sup>lt;sup>1</sup> Mr. Kiraly sent the 14-page document attached hereto as <u>Exhibit B</u> in several of the harassing emails described herein. We are informed and believe this document is an unedited, true and correct copy of the website, https://christinelong.attorney, created by Mr. Kiraly, in PDF format.

Mr. Kiraly has falsely and publicly accused Ms. Long of being a "rapist of an attorney", whose clients are "Jihadi", "organized-crime" groups, and "Muslim terrorists" who he falsely accuses of "near-rape" of a third-party. (Exhibit B.)

In the United States, the term "jihadi" is most commonly associated with Islamic Extremist terrorism. By wrongfully alleging Ms. Long is an integral member of a group of Jihadis, Mr. Kiraly has falsely, and publicly identified Ms. Long as part of a terrorist organization to incite violence against her in the workplace and in her home.

This is not the first time Mr. Kiraly has threatened Berliner Cohen, LLP. On or around July 6, 2021, Mr. Kiraly contacted another partner of Berliner Cohen, LLP after employees visited websites Mr. Kiraly created to harass Fremont Toyota in an attempt to intimidate the firm from representing Fremont Toyota. See **Exhibit I**. He then and now threatens that if Berliner Cohen, LLP continues with representation he will seek to have the attorneys stripped of their licenses and damage their reputations.

We are informed and believe that Mr. Kiraly's conduct to incite violence, defame, threaten, intimidate, and harass Ms. Long is **not protected speech**, and constitutes a violation of the anti-SLAPP statutes and therefore he should be immediately restrained from continuing said conduct, and ordered to remove all publications regarding the same.

We are further informed and believe that electronic harassment is a prosecutable crime under Penal Code section 653.2(a) and is defined as:

[I]ntent to place another person in reasonable fear for his or her safety, or the safety of the other person's immediate family, by means of an electronic communication device, and without consent of the other person, and for the purpose of imminently causing that other person unwanted physical contact, injury, or harassment, by a third party, electronically distributes, publishes, e-mails, hyperlinks, or makes available for downloading, personal identifying information, including, but not limited to, a digital image of another person, or an electronic message of a harassing nature about another person, which would be likely to incite or produce that unlawful action. Penal Code section 653.2(a).

On or around December 13, 2021, Ms. Long spoke with Fremont Police Department ("FPD") on behalf of her client prior to filing the WV-TROs in case numbers 21CV004608 and 21CV004610. We are informed and believe FPD began an investigation into both Respondent and his accomplice, Mr. Martin, at that time (Case No. 211209028), and were strongly encouraged by FPD to file the restraining orders.

On or around January 18, 2022, Ms. Long again spoke with FPD regarding Respondent's conduct and was strongly encouraged to file the instant TRO. FPD has attached Ms. Long's incident report to the above-mentioned existing case number and investigation.

Mr. Kiraly has a history of cyberstalking and harassing others. We are informed and believe he has previously launched a cyberattack on another referenced in one of his diatribes, sending them over 1,000 post-cards, with horrendous false allegations, and sending up to 100 emails on any given

day. In addition, Mr. Kiraly has cyberstalked and harassed Ms. Long's client, Fremont Toyota, creating at least 18 websites using the name and likeness of Ms. Long's client, its employees, its employees' family members, its late owner, and its late owners' family members, as well as sending over 350 harassing emails wrongly accusing them of being members of a Jihadi terrorist group and fraud. Please see TRO issued December 23, 2021, in case number 21CV004608.

#### I. Mr. Kiraly is Stalking Ms. Long

Mr. Kiraly is unlawfully using Ms. Long's name a likeness to create misleading email addresses to send emails to her colleagues and family members, for example me@christinelong.attorney.

Mr. Kiraly has sent emails from me@christinelong.attorney to Ms. Long's colleagues and family members, leading recipients to believe the emails are coming from Ms. Long. So far, we are aware of over 26 emails Mr. Kiraly has sent to Ms. Long's colleagues and family members from this email address. (Exhibit A and F.) Further, when he sends emails he will also change the filters so that the name that they appear to be coming from reads Christine Long Review or Christine Long Attorney, causing people to believe that Ms. Long sent the email – when she clearly did not.

In these emails, Mr. Kiraly is:

- (1) Asking the recipient to send him intimate and personal details about Ms. Long including information about her marriage/family, her childhood, her character, her accomplishments, and so forth (e.g., "the connection between the Silva family [] and Christine," "Is she married to one of the Silva men?", information regarding "Christine's school days, accomplishments, and strengths of character.") (Exhibit A.); and
- (2) Leading the reader to believe that he is requesting this information with Ms. Long's permission (e.g., "Christine would confirm that she is aware of this inquiry.") (Exhibit A.).

Mr. Kiraly is unlawfully investigating and stalking Mr. Long. He is intentionally deceiving Ms. Long's family and colleagues into believing these emails are coming from her so they will open the emails, then blatantly lying that he has permission to gather intimate and personal details about her life – including who she is married to, her relationship to various named individuals and her current vehicle and residence.

We are informed and believe this is not protected speech. We are informed and believe this court has the authority to restrain Mr. Kiraly from stalking Ms. Long, including restraining him from contacting Ms. Long's family and colleagues to solicit private information about her.

#### II. Mr. Kiraly has Launched a Cyberattack to Defame and Harass Ms. Long

#### A. Mr. Kiraly's Cyberstalking and Direct Harassment of Ms. Long

On January 16, 2022, Ms. Long received an email from Mr. Kiraly, with at least 9 others cced, including Ms. Long's client who has the above-mentioned TRO against Mr. Kilary (21CV004608). Mr. Kiraly references a PDF that is "going to a number of people in multiple US

State," and brags that in the 2020 he was able to "get one of these things to 20% of the population of a US city ... [he] was pretty proud of that." See **Exhibit C**.

On January 17, 2022, Ms. Long received another email from Mr. Kiraly, with at least 3 others cc-ed, with a PDF attachment of a website he created unlawfully using Ms. Long's name and likeness, https://christinelong.attorney. See **Exhibit D**.

In the email, Mr. Kiraly falsely accuses Ms. Long of engaging in "abuse of process", committing a "prosecutable" crime, and accepting a "blank check" from her alleged client "to do whatever was necessary against him." Mr. Kiraly threatens Ms. Long that he will "go to the Feds", he will go public to "immediately end any 'rising star' status that [she] still possess[es]", and that her "career is actually on the line here." (Exhibit D.)

A copy of the website Mr. Kiraly provided in his email, attached hereto as **Exhibit B**, makes a series of egregious accusations and defamatory statements about Ms. Long which have placed her in reasonable apprehension of harm.

- 1. Mr. Kiraly wrongfully alleges that Ms. Long is embedded in an organized-crime and terrorist group by repeatedly alleging Ms. Long's clients are Jihadi and have stolen millions of dollars:
  - "The current matter is about the conduct of your Jihadi clients."
  - "Subject: Addressing Jihadi 'Mark' Hashimi and attorney Christine Long."
  - "[T]he attorney discussed here [Ms. Long] should face prosecution."
  - "The perpetrators are literal Jihadi Muslim hatred types in a group that has allegedly stolen millions of dollars."
  - "The term 'Jihadi' is used here with reflection and is quite accurate."
  - "The Jihadis are backed by wealthy organized-crime figures, the Khachaturians." (The Khachaturian's are the family members of Ms. Long's client's late owner)
  - "The Jihadis steal millions of dollars through loan fraud and other practices."
  - · "Jihadi, false Muslim, terrorist."
  - "[Y]our group's near-rape of somebody because his faith wasn't' exactly the same as yours."
  - "[A] reasonable person will agree, upon review of the facts, that 'Mark' Hashimi and his **Afghan Muslim group** at Fremont-Toyota should be described as 'Jihadis'." (Fremont-Toyota is Ms. Long's client.)
  - "A reasonable person will agree that 'Jihadi' is the term that fits."
  - "When violent people or organized crime figures are sufficiently wealthy that
    they can try to use trolls such as you [Ms. Long] sociopath
    compartmentalization types, the epitome of remorseless crime to cover things
    up..."
  - "The current matter involves organized crime and millions of dollars in stolen money being funneled to a Church that isn't going to be pleased by publicity; actual, literal, Jihadis..."

- 2. Mr. Kiraly wrongly accuses Ms. Long of abusing her power as an attorney and threatens her career:
  - "Christine owns a car that's surprisingly old for a rich, powerful, rapist of an attorney."

• "The fact that she's a rapist type..."

"Abuse of process is fine with your type."

- "It does seem egregious enough to be prosecutable as opposed to simply a civil tort."
- "If the Khachaturian heirs told you that there was a blank check and to do
  whatever was necessary, they wouldn't ask questions, I'm going to need to go to
  the Feds."
- "You \*have\* committed a prosecutable crime and, more importantly to your
  type, you're playing with the potential for publicity that would immediately end
  any 'rising star' status that you still possess."

"[Y]our career is actually on the line here."

"...egregious abuse of process that is arguably disbarment level."

- "[Y]our career is most likely toast. Regrettably, the primary card that I might have been able to play in that context is dead but I'm looking at the new cards in my Gypsy Queen hand."
- "There is obviously a plan."
- 3. Mr. Kiraly threatens Ms. Long's safety by reinforcing that he is apparently above the law because of his history of successful cyberstalking, alleged relationship to law enforcement, and the tracking/stalking resources he has available to him:
  - "If you'd like to see more of an introduction, I could refer you to some of the
    attorneys that I've had the pleasure of dealing with in the past. Two of them left
    their jobs subsequent to reflection, but I'm sure that they'd be pleased to talk to
    you."

"The police and FBI are comfortable with me."

- "A police detective even told me once that I should go into police forensics."
- "I'd phoned the detective mentioned above because he'd shown up in a geolocation."

"I've been doing this for 10 years."

- "You're accustomed to bluster but you're pretty close to needing to eat sh\*t."
- "I have just one skill, Ms. Long. A talent, actually. I didn't earn it. It was nascent at age 4. It manifested in a memorable way at age 6. I should have run with it after that instead of burying it until the blackhat came for me in 2013."
- "I personally have been doing this type of mailing ... for a decade as of 2022. I've gotten it down to a science and, in fact, at Christmas 2020, I managed to reach 20% of the households in one US city."
- "I've had two attorneys, as I've implied, literally leave their firms out of fear of
  prosecution (in one case) and Federal investigation (in the other). Another who'd
  overreached to the point of pretty much unavoidable disbarment literally

begging me not to go to the State Bar. 'We can work this out! We can work this out!' Chuckle."

#### B. Mr. Kiraly's Harassment of Associates of Ms. Long

On January 16, 2022, Mr. Kiraly sent an email to two individuals he believes to be Ms. Long's brother and sister-in-law. See **Exhibit E**. Mr. Kiraly attached a copy of the abovementioned website, requesting one of the recipients forward it to Ms. Long directly. In addition, Mr. Kiraly states that Ms. Long will be "the subject of one chapter of a book in process" and requests a response commenting "on her practice, motivations, and character."

On January 17, 2022, Mr. Kiraly sent an email addressed to who he believes to be two of Berliner Cohen's Partners' spouses, cc-ing at least 6 others, from a misleading email address – me@christinelong.attorney. See **Exhibit F**. This email included defamatory statements about Ms. Long and attached a copy of the abovementioned website. In addition to these emails he has also emailed associates in the firm, their spouses, their family members and those that he believes to be family members, threatening those attorneys as well.

On January 18, 2022, Mr. Kiraly sent an email to Electronic Frontier Foundation, cc-ing Ms. Long and at least 9 others (including her client and several Berliner Cohen Partners). See **Exhibit G**. In this email, Mr. Kiraly wrongly claims Ms. Long's client "is a well-defined external jihad group," that they "actually are Jihadis involved in long-term organized crime," and that Ms. Long "belongs in prison." Mr. Kiraly further indicates that he does not intend to comply with any court orders to remove the websites, rather, he intends to turn control of the websites "over to Anonymous and groups of a similar nature," and that "there certainly won't be a takedown that doesn't lead to more copies of the websites out there."

On January 20, 2022, Mr. Kiraly unlawfully used the name and likeness of another Partner and Berliner Cohen, and one of Berliner Cohen's clients to create another misleading email address, susan.bishop@markhashimi.org. Mr. Kirlay sent a threatening email to yet another Partner of Berliner Cohen, cc-ing at least 9 additional people with the same last name (which we assume he believes to be this Partner's family members). See <a href="Exhibit H">Exhibit H</a>. In this email, Mr. Kiraly attached copies of the abovementioned website, wrongly states Ms. Long has committed a "prosecutable crime," and threatens the recipients:

- "If I don't receive a complete and polite response in the short term," he will proceed to "start work on a State Bar filing."
- "[S]imilar positive results [i.e., websites] can be arranges where appropriate for other attorneys at the San Jose office."
- "There certainly is going to be such a setup ... once the attorneys in question are identified."
- "[A]ny attorney who's associated ... is likely to need to learn a new profession."
- "Which of the senior partners would like to step forward and proudly take responsibility for the purposes of future publicity and/or administrative or legal filings?"

Mr. Kiraly further indicates in the January 20, 2022, email that he has decided to expand his dissemination of the defamatory websites to "Luxembourg, Bulgaria, and Russia" as the "first three regions." And that he plans to contact Fox News to pick up this story. (Exhibit H.) The areas he targets are clearly designed to instill fear.

#### III. Mr. Kiraly's Unstable Mental State

We are informed and believe that Mr. Kiraly is not of his right mind.

- 1. Mr. Kiraly's stream of consciousness, as set forth on the website he created to defame Ms. Long indicates he is mentally unstable and erratic, leading a reasonable person to believe he is dangerous. (Exhibit B.) Throughout the website:
  - Mr. Kiraly abruptly tangents to stories about:
    - His extremely abusive childhood,
    - · His OCD and abusive father,
    - The extreme lengths at which he will expose personal information of individuals he is targeting,
    - · Other alleged terrorists he is aware of,
    - Failed attempts others have made to stop his cyberattacks, including his own family members,
    - Death threats he has received from his family members, and
    - His assertion and laughing that he has been doing this for 10 years and glee at having attorneys beg him to stop.
  - Mr. Kiraly refers to himself as:
    - Neither "the hero or anti-hero of [his] own life."
    - · "Aunt Coder."
    - A "Gypsy Queen with a colorful deck of card."
    - "Rain Man" who "pretend[s] to be as neurotypical as Sheldon."
    - "[S]avant and me are sitting in a tree being what we must be."
  - Mr. Kiraly appears to believe he is some sort of vigilante: "I gave up my home of 25 years, my retirement, and even the books that the boy loved to stand up against exactly the crime that is being committed."
- Mr. Kiraly repeatedly states throughout the abovementioned emails and website that he is intending to prepare a book memorializing his unlawful cyberstalking and harassment:
  - "Christine in likely to be the subject of one chapter in a book in progress."
     (Exhibit E.)
  - "This is going to be a kick-ass book," (Exhibit B.)
  - "[Y]ou're a chapter. Welcome to the story, Ms. Long." (Exhibit B.)
- 3. Mr. Kiraly preys on Ms. Long throughout the website, attempting to bate her into engaging with him, in a Hannibal-like tone (Exhibit B):

- "Talk to me Christine...let me see the rest of what you are."
- "Tell me a little about your life, too, just a little, and I'll offer things back to you that you'll find interesting and useful."
- "As you approach 50, just months away, what would you like to know about yourself and the meaning of your life?"
- "I made a similar offer to Opposing Counsel in 2012. To every attorney involved. They seemed reluctant to talk. I remember complaining to them that it was like radar echoing into the void. But they gave me enough and you'll do the same."
- "Did it ever occur to you to anybody in the muck and mire of the Khachaturian organized-crime orbit to find out what I am before jumping to conclusions?"
- "Think of me as Aunt Coder, a kindly Gypsy Queen with a colorful deck of cards."
- 4. Mr. Kiraly continues to evade service of the TRO this court issued on December 23, 2021, in case number 21CV004608, restraining Mr. Kiraly from substantially similar conduct against Ms. Long's client. To date, Berliner Cohen's process servers have attempted service at least 15 times with no success. Noting they believe they observed movement inside Mr. Kirlay's residence, but no one will open the door.

It is clear from Mr. Kiraly's statements in several emails that he has spoken with Mr. Martin (who has been served), has reviewed the complaint in its entirety, and is therefore intentionally evading service:

- "[Y]our firm seems to have served somebody who you knew had no responsibility for the bulk of what was in the complaint." (Exhibits D & F.)
- "They're hoping Brian [Martin] won't get representation." (Exhibit G.)
- "[T]hev'll try some sort of trick to get me to take down the sites." (Exhibit G.)

#### IV. History of Cyberstalking and Harassing Conduct

As described above, this court has already issued a TRO against Mr. Kiraly for substantially similar conduct (21CV004608), and we are informed and believe that Mr. Kiraly has previously launched a cyberattack on another referenced in one of his diatribes. Mr. Kiraly confirms throughout the abovementioned website that he has been doing this for 10+ years. (Exhibit B.)

Moreover, this is not the first time Mr. Kiraly has threatened Berliner Cohen, LLP. On or around July 6, 2021, Mr. Kiraly contacted another partner of Berliner Cohen, LLP after members of the office visited websites Mr. Kirlay created to harass its client, Fremont Toyota, in an attempt to intimidate the firm from representing Fremont Toyota. (Exhibit I.)

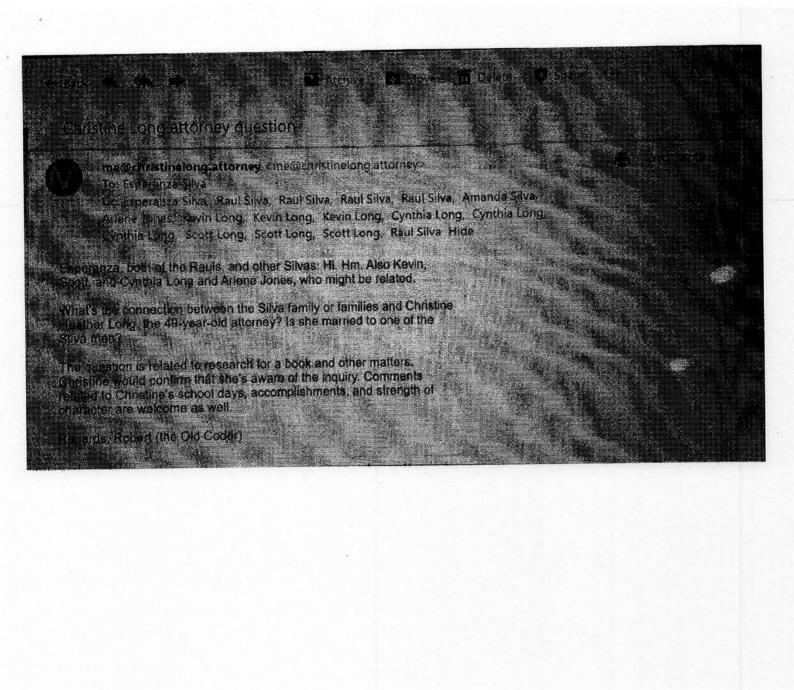
Further, Mr. Kirlay appears to brag about his previous cyberattacks throughout the abovementioned emails and website clearly indicating that he has no intention to comply with court orders to takedown his websites related to Ms. Long or her client. (Exhibit B & G.)

#### V. Conclusion

For the reasons set forth above, Mr. Kiraly's conduct would place any reasonable person in fear for his or her safety, as well as the safety of his or her immediate family, is not protected speech, and serves no legitimate purpose. Accordingly, Berliner Cohen and all its employees require the immediate intervention of the court to protect them from Mr. Kiraly, by restraining his communications and ordering him to take down all websites related to Christine H. Long or Berliner Cohen, LLP.

Petitioner requests this court restrain Mr. Kiraly from contacting any employees of Berliner Cohen, not just Ms. Long. Given Mr. Kiraly specifically targeted Ms. Long after she was individually identified as filing a TRO to restrain Mr. Kiraly on behalf of her client, Fremont Toyota, Petitioner is hesitant to identify any additional individuals in the instant request for restraining order, as to not put targets on their backs.

# **EXHIBIT A**



# **EXHIBIT B**

Date: January 16, 2022

Subject: Addressing Jihadi "Mark" Hashimi and attorney Christine Long

#### To attorneys:

Standard disclaimer: Nothing in this document is confidential. Actually, copies will be distributed.

The writer has had some success in dealing with attorneys in the past. He feels that the attorney discussed here should face prosecution as opposed to administrative action and is exploring options related to that.

It's an unusual story regardless of how things turn out.

#### **About this document:**

This document is released under the following license and may be redistributed: Creative Commons CC BY-NC-ND 4.0 International. This is release 220116. Higher-numbered releases supersede lower-numbered releases.

This copy is 14 numbered pages. It was prepared using LibreOffice 7.2 and Laclin, a Linux distro of the author's own design and a FOSS project for 25 years.

#### To Electronic Frontier Foundation:

Short version: A polite and soft-spoken law-enforcement type was the victim of organized crime. The perpetrators are literal Jihadi Muslim hatred types in a group that has allegedly stolen millions of dollars over time.

The term "Jihadi" is used here with reflection, is quite accurate, and is discussed further down.

The Jihadis are backed by wealthy organized-crime figures, the Khachaturians, and Khachaturians have slapped CLETS, an emergency anti-violence measure, on the victim in a bid to get websites that he doesn't control taken down.

No, the victim isn't me. The websites are mine but they went after a hapless victim who is now arguably due 6 figures in abuse of process damages. It's odd. The attorneys are either playing some sort of 5D chess or they're idiots.

#### To dead-tree writers or bloggers:

Short version: Afghan Muslims sue an auto dealership over hate speech and end up running the place. They're Jihadi types who then commit hate speech against non-Muslims themselves.

This is an insider account. The insider, Sam Pawar, will testify under oath and states that he'll deliver

other parties as well.

The Jihadis steal millions of dollars through loan fraud and other practices. I'm an editor. I put up websites with 3 of the victim stories on it. Note: One story has been removed temporarily pending further research.

The owners, believed to be the "Hank Torian" heirs aka Khachaturian Foundation, hit one of the victims with CLETS in a bid to get websites that the victim doesn't control taken down.

The CLETS is out of the blue. There isn't a single relevant allegation. It's about the websites that the victim isn't able to take down even if he's pressed to do so.

This is criminal abuse of process. The attorney involved, Christine Long of Berliner-Cohen, needs to face prosecution as opposed to State Bar discipline. This is a rare case that is so unusual it might be possible.

Shorter version: Wealthy people employ a group of literal Jihadis to steal ordinary citizens blind. They're trying to use CLETS to extort a gag order. If it helps, the victim is a soft-spoken Law Enforcement type who's had two Fox TV series made about him.

This is going to be a kick-ass book.

#### To other recipients:

You've been Cc'd for legitimate and reasonable purposes that are consistent with and arguably protected under U.S. laws. If you happen to know either of the two people identified below, a forward is requested.

If you're able to comment on the family or biographical factors that led these two people to commit prosecutable crimes – yes, Christine as well as "Mark" has already done so – or if you have direct or indirect knowledge related to hate speech, loan fraud, and other types of abuse at Fremont-Toyota, your comments are solicited.

\* "Mark" Hashimi aka Kamal Sayed Hashi. This is literally a Jihadi type as explained and discussed in this document.

"Mark's" residence address is unknown. Even the city isn't clear. But my understanding is that he's complained that the address is disclosed on one of the websites.

I've looked and haven't found it so far. The Chickpea Court address will be added today because it appears in this document. It doesn't seem to have been on the websites before, but perhaps it was in the Cc list in one of the working copies of a past document. The nature of the address isn't clear regardless. There's more on pages 3 to 4 below.

The take-away is that, if I haven't posted "Mark's" residence address yet, for legitimate and reasonable purposes that are consistent with U.S. laws, I'm certainly going to do so.

I have the right to speak with third parties in connection with the multiple felonies that "Mark" has committed. The third parties certainly may include neighbors.

I solicit information in cases that I become involved in for use in biographies of subjects and my own autobiography as well as for other legitimate and reasonable purposes. This obviously requires disclosure of information as well.

You'd be surprised at what people will tell total strangers. Circa 2012 I spoke with one of my father's neighbors. I'd never met the neighbor. But he told me that, when my father Jim went to his mailbox, if he thought that nobody was looking, he'd do a little dance.

You don't know Jim, so you won't understand the surprise involved in hearing this. Let me put it this way: This was physically a gorilla type, and a violent gorilla at that. Jim wasn't a ballet dancer or even physically expressive except when he smashed things.

For half a century, my father had concealed from everybody that he was massively OCD. Concealed it despite the fact that it might have helped us to understand my youngest brother Scott. But the take-away is that if you find the key, the phrase that unlocks somebody, the door will open and you'll get what you need.

You might need to reach a lot of people to make progress. But I've built some skills in that context. In 2020, I reached 20% of an entire city by snail-mail. It was epic.

No demand, filing, TRO, or RO on the face of the planet can forestall or even limit my rights to such communication except in specific contexts. Especially not on an "a priori" basis. Attorneys who read this are aware that this is the case.

Most attorneys. There was a dullard once who went looking for obscure State agencies that might be able to order takedowns of websites that attorneys didn't like just because the attorneys didn't like them. I had fun with that one. The rest of the story is for another time.

The usual way around the fact that U.S. citizens have rights to communication is to use abuse of process to extort agreement to things like gag orders, confidentiality clauses, non-disparagement clauses, and the like.

I've never signed such a thing in personal contexts. There's more in a few pages about what happened when somebody tried abuse of process on me. For right now, there are two points that need to be understood.

I know that "Mark" was married to Kathyrn Paulina Campos aka Katherine and that she filed for divorce on July 01, 2004. That happens to be public information. A link to the divorce case is posted on the "Mark Hashimi" site. It's Contra Costa County Superior Court Case MSD04-03286. Wish to take the information down? Take it up with Superior Court.

It looks like Katherine or Katheryn called off the divorce. However, it isn't clear that "Mark" has or hasn't resided with her since then. It looks like Katherine might have taken him back but booted him out a few years ago. But that isn't the point right now.

One point is that any citizen is able to use a complicated process known as "type words into Google" to see the following:

Katherine herself might own and/or reside at 3018 Chickpea Court, Antioch, CA 94509 with a 72-yearold man [DOB 1949] named Guillermo A. Campos Jr., possibly Katherine's father.

"Mark" doesn't seem to be one of the owners. I don't understand the records. It looks like the house may have gone back and forth between "Mark" and Katherine. Some of the paperwork is dated 2005, the year that the divorce was called off. The property was probably one of the issues that needed to be settled as part of the reconciliation.

Maria Esperanza Campos [DOB 1955] might have lived on Chickpea Court in the past as well. Maria might be Katherine's mother and therefore "Mark's" mother-in-law and able to assess his character as mothers-in-law like to do.

Bethany Campos [DOB 1988] was associated with the same address at some point too. She's probably Katherine's sister and therefore "Mark's" sister-in-law. Sisters-in-law are often as opinionated as mothers-in-law and perhaps this one has useful information.

Type words into Google. Such difficult. Wish to take down such information? Take it up with Google. They do take things down, of course, but cause needs to be demonstrated. It's awkward for attorneys who prefer the majesty of their presence to be sufficient.

The other point is that, if legitimate and reasonable purposes can be stated, any citizen is entitled not only to type words into Google but to distribute information that turns up and to discuss the information with third parties.

We'll come back to this isssue below. And I \*will\* be talking to Campos neighbors to discuss Jihadi "Mark" Hashimi for legitimate and reasonable purposes that are consistent with and arguably protected under U.S. laws.

\* Christine Heather Long. Abuse of process go-to attorney, Berliner-Cohen, San Jose. SBN is believed to be 199676 but this hasn't been verified.

2 unconfirmed snail-mail and 5 unconfirmed email addresses are listed below for legitimate and reasonable purposes that are consistent with and arguably protected under U.S. laws. See remarks further up regarding the principles involved in disclosure of street addresses. Similar but slightly different principles apply to the disclosure of email addresses.

travellong72@yahoo.com christine.long@berliner.com chl@berliner.com

sunnyp716@gmail.com

chrislong@att.net

1238 Bent Drive Unit H, Campbell, CA 95008 2873 S Bascom Ave APT 205, Campbell, CA 95008

There are lots of connections to Silvas. Silvas are piled up to the rafters doing whatever it is that Silvas do. Is Christine married to a Silva or is there some other connection? Either way, what do the Silvas think of the actual prosecutable crimes that Christine engages in?

Born 1972. I used to know 5-year-olds who were born that year. They're basically old now. How is that

#### possible?

Christine owns a car that's surprisingly old for a rich, powerful, rapist of an attorney. 2003. It's registered to the Bent Drive address so that one is probably correct for snail-mail purposes. But perhaps the registration record is old and the car has been recycled into something shiny and new. Would that that were possible for people.

I don't mean to suggest that 2003 was long ago. When I lost my home of 25 years in 2013 and cleaned it out on departure, I found that I still had Halloween candy from the 1980s. I still have socks that date back to the 1990s. How is it that time is so short and so long at the same time? It's precious, of course, either way.

Christine's parents were Jerald Brennard Long [1943-2009] and Mary Elizabeth Long nee McCoy [1944-1997]. This is confirmed in part by a December 09, 2009 probate filing that was made in Sacramento County Superior Court.

Christine's parents were married on August 09, 1969. This is consistent with the year of Christine's birth [1972].

Most of Christine's older relatives – Jon Brennard Long, Theresa Giavinao, and a few others – seem to be deceased.

There is an elderly Barbara Long [DOB 1940] and an aging Martha Long as well [DOB 1950] but I'm not sure of where these two women fit in. It isn't confirmed that they're even related to Christine. If Barbara or Martha receive this letter and either is related, clarification for the purposes of the book is requested.

I didn't know Jerald and Mary. I'm sure they'd be proud to know that their daughter turned out to be a successful attorney. The fact that she's a rapist type, not as proud. It's possible that Jerald and Mary would be revolted by this part. But we'll never know. Those who travel to the undiscovered country don't speak.

There is no hereafter except in the context of quantum immortality. There is no deity save for the little action figures that Jihadis such as "Mark" Hashimi and my parents wave about, plastic toys that are part of a child's game of never-ending hatred.

It's highly likely that Amber Jones nee Long [DOB 1976] and Phillip [sic] Long [DOB 1977] are Christine's siblings or cousins. They'd be able to comment.

1976. There was a funny comic at the time. One boy is talking to another about his grandfather. "He's old enough," he says, "to remember the Bicentennial." The other boy is impressed at such age. Now the joke is real.

Phillip may have been named after a relative named Phillip G. Long [1893-1974] who passed away 3 years before he [the younger Phillip] was born.

Christine and Phillip [the younger one] are closer than most sisters and brothers. This is just slightly visible from a distance but it seems to be the case. Perhaps they started to rely on each other subsequent to the earlier than usual passing of their parents.

#### Addressing Jihadi "Mark" Hashimi and attorney Christine Long - Jan. 16, 2022

Phillip runs Phillip Long Home Improvement. He's his own boss. Good for him. It's honest work and not as ugly as what Christine does. I don't know the nature of Amber's employment.

#### To all recipients:

\* You'll need the full story. Type Mark Hashimi into any search engine but especially Bing or Duck Duck Go. Look for the listing about Mark Hashimi of Fremont-Toyota. From that site, you can get to the main Fremont-Toyota Auto Loan Fraud site.

For Google, the Mark Hashimi site will be in the bottom half of the first results page. For Bing or Duck Duck Go, it'll be higher.

\* This document may be downloaded from the Fremont-Toyota Loan Fraud website and at the new host-name indicated below as well:

#### https://christinelong.attorney/

\* Those who agree that the document deserves wider exposure will be pleased to hear that, in the medium term, snail-mail copies may be sent en masse to neighborhoods in California and other U.S. States.

I personally have been doing this type of mailing, for legitimate and reasonable purposes that are consistent with U.S. laws, for a decade as of 2022. I've gotten it down to a science and, in fact, at Christmas 2020 I managed to reach 20% of the households in one U.S. city. As the saying goes, that's mighty fine eatin'.

So, there need be no concern that this and other documents won't be seen by a surprisingly large number of people.

#### "Mark" Hashimi aka Kamal Sayed Hashimi, good day.

"Mark", I'm writing to ask you to clarify some points for the record. The public record, to be clear. Failure to respond will be documented publicly as well.

I've taken the liberty of Cc'g an attorney, Christine Long, who seems to be associated with you. I'll include introductory remarks for her further down.

I haven't checked to see if Ms. Long is the same attorney who told you to shove off about 6 months ago. If it's the same attorney, I'll need to ask her to explain what led the Khachaturian RICO group to change its mind and fund a prosecutable crime in addition to the two felonies that you personally, it's asserted here quite publicly as a statement of fact, have committed and/or are involved in as an accessory after the fact.

The questions for you are as follows:

- Q1. Do you acknowledge or contest that the Muslim core group at Fremont-Toyota routinely engaged for months in legally prohibited conduct against an employee of Asia-Indian ethnicity, Sam Pawar, such conduct focusing repeatedly on the fact that he wasn't Muslim and therefore deserved to be dehumanized?
- Q2. Did such conduct include or not include the statement "Mother-f\*cker, you can't call us brother because you aren't Muslim"?
- Q3. Was there or was there not repeated mockery of Mr. Pawar's Indian ancestry and religion, such mockery including statements such as "Pray to your Hindu god" and taunts such as "Mr. Curry" [a reference to Indian food]?
- **Q4.** Did your people as a group and not as isolated cases repeatedly mock Mr. Pawar's medical condition as well using taunts such as "Mr. Turtle" or did this not happen?
- **Q5.** The Qur'an uses the word "jihad" in two general contexts: the internal struggle, "al-jihad fi sabil Allah", and the external one. The inner struggle is praiseworthy. The external one, not so much. The latter ranges from, on the mildest side, those who proselytize to, on the most dangerous side, Muslim terrorists.

Do you acknowledge or contest that you personally and/or those under your authority at Fremont-Toyota — as a group and not as isolated cases — are absolutely and unquestionably "Jihadis" that fall right in the middle of the external-jihad scale?

If you contest this, then you contest Sam Pawar's statements. Which he's prepared to make under oath. The facts don't support the argument that your people were quietly engaged in "al-jihad fi sabil Allah". Respectfully, you're a Jihadi.

"Mark", I forget if you've read my full story. I know that some of the people on your side have done so. The part that matters here is that I gave up my home of 25 years, my retirement, and even the books that the boy loved to stand up against exactly the crime that is being committed. I'm not inclined to let the decision be for nothing.

I'll be transferring control of multiple online copies of the websites to people in different countries. Electronic copies will be emailed, snail-mailed, and distributed by other means to a few thousand people. That should be enough.

If you so much as poke a finger at it, Streisand Effect is a possibility. Jihadi, false Muslim, terrorist; I suggest that you Google the term "Streisand Effect".

الْمُنَافِقُونَ وَالْمُنَافِقَاتُ بَعْضُهُم مِّن بَعْضٍ ا يَأْمُرُونَ بِالْمُنكَرِ وَيَنْهَوْنَ عَنِ الْمَعْرُوفِ وَيَقْبِضُونَ أَيْدِيَهُمْ نَسُواْ اللَّهَ فَنَسِيَهُمْ إِنَّ الْمُنَافِقِينَ هُمُ الْفَاسِقُونَ

If I've guessed the dialect wrong, that's supposed to be the Farsi version of Surah 9:67 of a book that you use as a pillow as you self-pleasure to the thought of hatred and theft. Allah had you in mind when

he dictated the Surah.

I'm reminded of a comical phrase in modern English. "Oh, the irony." You do see the irony in (a) your group's take-over of Fremont-Toyota years ago subsequent to alleged "hate crimes" against you and (b) the victory followed by your group's near-rape of somebody because his faith wasn't exactly the same as yours.

I speak, of course, simply as an individual who is going to write for legitimate and reasonable purposes about current matters, about each person involved, and about the factors that led each person to defecate on such gods as they pretended to respect.

I don't formally represent Mr. Pawar or anybody at all. But my guess is that he'll be pleased to testify.

Nothing further for you right now, Kamal Sayed. Let's move on.

#### Jihadi note from the websites:

For the sake of completeness, here's a related notice that I posted online on January 15, 2022.

In fact, the word [Jihadi] has never been used [on this website] except briefly during one edit stage. But a reasonable person will agree, upon review of the facts, that "Mark" Hashimi and his Afghan Muslim group at Fremont-Toyota should be described as "Jihadis".

An ex-employee of Fremont-Toyota of Fremont-Toyota is prepared to state under oath that the Muslim hatred group there told him, "Mother-f\*cker, you can't call us brother because you aren't Muslim".

The Fremont-Toyota Muslims proceeded to terrorize Mr. Pawar for months subsequently, the threat of Muslim hatred and violence present every moment as the victim of Muslim intolerance and hate speech tried to navigate and to cope.

Add to this the fact that "Mark" Hashimi doesn't hesitate to commit prosecutable crimes. A reasonable person will agree that "Jihadi" is the term that fits.

#### Christine Long, Howdy.

Ms. Long: I thought that it would be respectful to Cc you on the current letter to Jihadi Kamal Sayed of Fremont-Toyota.

If you'd like to see more of an introduction, I could refer you to some of the attorneys that I've had the pleasure of dealing with in the past. Two of them left their jobs subsequent to reflection, but I'm sure that they'd be pleased to talk to you.

We both know that the State Bar rarely elects to look closely at things. Discipline is rare and disbarment more so. But it does happen in egregious cases and you seem to have stepped in a cow patty of unusual depth and vigor.

Nothing stated here is legal advice or is confirmed to be entirely correct. You're invited to point out principles that I've gotten wrong. I seek your guidance and will listen attentively.

- \* Domain-name disputes are usually trademark issues. Somebody pretty much needs just to demonstrate legitimate and reasonable purposes for use of a mark to frustrate attempts to do end runs around standard procedures.
- \* Such purposes include, but are not limited to, Fair Use and Nominative Use. If such purposes exist, attempts to do end runs using claims of "cybersquatting" or "harassment" may be prosecutable crimes as such claims are implied threats to commit abuse of process. Abuse of process can be treated as a prosecutable crime.
- \* The principle of legitimate and reasonable purposes note that I'm talking about a general principle as opposed to a legal term is applicable in a number of contexts.

Depending on the purposes involved, the same act may be praiseworthy, actionable, or prosecutable. In the civil arena, attorneys therefore focus not on the facts of a dispute but on the struggle to prevent facts or purposes from coming out. It's all about noise. The principle applies regardless. Let's dig into this a bit.

I post not just street addresses, but – for legitimate and reasonable purposes that are consistent with and arguably protected under U.S. laws – Social Security Numbers, biographies, family trees, tax dodges, hidden real estate, reports of adult-child romance sites run by subjects, and issues that the police, the FBI, ICE, and the State Bar express an interest in.

For those who'd like to do legitimate and reasonable research into the matter, research that is consistent with U.S. laws, some of the identities and Social Security numbers involved are believed to be: Name AKA DOB Title SSN 1933-05-10 VP Transamerica Jim Kiraly James Francis Kiraly 038-20-8134 **Grace Kiraly Grace Violet Kiraly** 1933-10-01 Chose Her Life 556-40-1879 Tom Kiraly Thomas Evan Kiraly 1960-01-24 CFO Hanger, Inc. 545-13-7011 1963-10-18 VP Amazon Lab126 Ken Kiraly Kenneth Paul Kiraly 573-45-7687 1980-11-20 Rising Star Attorney 142-76-2496 Michael Bonetto Michael Thomas Bonetto Maggie Desmond Margarent Webster Desmond 1949-03-24 Paralegal 571-80-5479

The police and the FBI are comfortable with me. When I explain purposes, they offer advice and assistance. They're not as pro-crime as you are.

A police detective even told me once that I should go into police forensics. That is related to a point that I'll explain later in this letter.

In an odd note, I'd phoned the detective mentioned above because he'd shown up in a geolocation, but it was a mistake. I'm good, but I'm not perfect. He was located 1,000 miles away from the city that I was tracing records for.

The subject that I was looking for turned out to be a political rival of my sister-in-law Virginia, a "rising star" in local politics. And the detective — located in another State — turned out to be the one who'd investigated her for the theft of her rival's cell-phone. He'd met both Virginia and her husband; my brother Ken. What the Hell.

That isn't the only coincidence in my world. There's a terrorist named Andy Ngo. One of his people asked him to kill me. It turned out that Mr. Ngo's attorney was Harmeet Dhillon, the rising-star Indian woman. Who happened to be my sister-in-law Virginia's attorney.

It's a small world. If one looks for connections between things, they often turn up. What coincidences are there in your life, Christine?

### \* The point about information is this:

From a legal perspective, I'm entitled to gather and distribute a wide range of information. There is no universal Federal right to privacy in this country, no Right to Be Forgotten law, and the word "harassment" loses its magic when information is gathered and distributed for purposes that a reasonable person agrees with.

That is the standard that they taught you, isn't it? That a reasonable person would agree?

When violent people or organized crime figures are sufficiently wealthy that they can try to use trolls such as you – sociopath compartmentalization types, the epitome of remorseless crime – to cover things up, the thing to do is to kick over the log and let the light of day shine down on the little creatures that scurry out.

I recommend the practice to people of fortitude and good faith. Let the sun shine on the insects that thrive in the dark.

There are both Federal and State laws related to personal information. Some of the laws have teeth and that's a good thing. But the laws don't favor attorneys of your type in the current contexts.

Multiple contexts, actually. Shall I bring more people who are able to comment on your clients to the table?

My father assumed that the book was going to be about the abuse. Just assumed. He didn't trouble himself to ask me.

I was in a wheelchair, I'd lost the use of my right hand, I didn't own a car and lived 200 miles from my

<sup>\*</sup> LOL. Ma'am, my father used to beat up my mother. At Thanksgiving 2011, I mentioned to my parents – I'm a senior citizen, but they were still alive – that I was working on a book.

parents. I wasn't asked not to communicate or to do or not to do anything at all. My father tried for a CLETS out of the blue because that is what rich people – violent abusers, rapists, Jihadis, and the like – do when they want a gag order.

Attorneys of your type make it possible.

There were no allegations against me. But I learned that CLETS was for rich people who wanted gag orders. The point of the action was solely to extort my signature on such an order.

It didn't go well for the other side. I was largely Pro Per and it took a year. But it cost them 6 figures and what they got for all that money, piles of cash, makes me smile. As Ford Fairlane used to say, "I f\*cked 'im".

The preceding is stated in a humorous tone. I will, in fact, succeed with some type of State Bar discipline or other legitimate and reasonable step if it's cited as being, in any way, shape, or form, an inappropriate threat.

I'm chuckling again. Before Opposing Counsel – the first one – turned tail and ran 10 years ago, she said to me, "You're using a threatening tone!" I responded, "It's a promising tone. Do you have a problem with that?"

The point is that I don't allow attorneys to fuzz the difference between "inappropriate threats" and "legitimate consequences".

Subsequent to the close of the 2012 to 2013 case, one of my brothers sent a blackhat after me. My cousin Russell had died of a drug overdose. I posted an obituary for Russell. My father ordered me to take down the obituary.

This was a violation of non-contact, but rich people don't follow the rules. Do they, Ms. Long? So, the blackhat came to tell me that I'd be hurt if I didn't comply and he tried to take down my sites himself. It didn't go as well as he'd hoped. Once again, "I f\*cked 'im".



It was probably Ken that retained the blackhat. Ken is the actual designer of the Kindle, the head of Lab126, and he reports to Jeff Bezos. I'm proud of him though he offered me death threats in 2012. Like, twice. Ken told me to kill myself and I received threats to effect that Amazon was going to "grease" my "ass". Really, my life was quieter before 2011.

It's an unusual family. 3 corporate VPs, wife-beating, child abuse, classes that taught wife-beating, pro-slavery — the house was full of books that said Blacks were better off as slaves — Christian Jihadis, glow-in-the dark crosses, 2 people with IQs that are double yours, inventor of the Amazon Kindle, aggregate wealth possibly \$50M. It wasn't much like the Waltons [the 1970s TV show]. It was more like "Dallas" on acid.



No, I'm not the J.R. figure. I was never the hero or anti-hero of my own life. I just hid for half a century. No longer, though.

I found that I was able to "take" the blackhat. It was an awakening; both the litigation and the climactic duel with the blackhat. FWIW The details weren't like Hollywood at all, but it had a similar tone in

places.

It's a colorful story, a new book in progress, and for legitimate and reasonable purposes that are consistent with U.S. laws, you're a chapter.

Welcome to the story, Ms. Long.

\* In 2012, I needed to find a witness to violent abuse that was nearly 40 years in the past. I produced one within 24 hours. Opposing Counsel dropped out of the case immediately. Perhaps it was a coincidence. The rest is in the book.

A junior attorney took over. He never showed any sign of weakness directly to me. But I was told that he literally wandered the halls at his law firm seeking some way to take my websites offline. He was told to clean up his own mess.

The current matter is about the conduct of your Jihadi clients. I laughed on the previous page at the thought of the number of people who might be willing to enter the matter. Christine, just how completely do you need me to document legitimate and reasonable purposes? I'm cooperative, really, so let me know.

\* You understand, don't you, that the need to document purposes reinforces my rights to communicate with third parties?

I possess such rights already, of course, and they can't be forestalled or even limited by TRO or RO except in specific contexts.

If there are legitimate and reasonable purposes, I can talk to pretty much anybody, too, including former lovers, former or current employers, High-School classmates, college associates, Chambers of Commerce, volunteer organizations, Church groups, and local or national advocacy groups for a wide range of issues.

I've been doing this for 10 years. I suppose you get that the preceding isn't a random list.

The peak moment came when I traveled 200 miles to join a specific Church and they happened to have lists of everybody's names and snail-mail addresses thumb-tacked to the wall in the waiting room. Public display, no expectation of privacy. Oh, that was great.

I'm building to a point here, Ma'am. One that will prove to be more embarrassing to you – and more interesting to the State Bar – than you're expecting. You're accustomed to bluster but you're pretty close to needing to eat sh\*t. Do read the part further down about Forrest Gump and try to follow what you're missing.

<sup>\*</sup> As I've implied, attorneys like to frame or position things so as to obviate discussion of facts or purposes. Just for fun, may I try my hand at it?

### Addressing Jihadi "Mark" Hashimi and attorney Christine Long - Jan. 16, 2022

The current matter involves organized crime and millions of dollars in stolen money being funneled to a Church that isn't going to be pleased by publicity; actual, literal, Jihadis taunting and mocking a very nice man — nearly a senior citizen — about his religion and his medical issue; and egregious abuse of process that is arguably disbarment level.

You don't need to watch your step with this one at all, right?

\* Minor technical point: There is no such thing as "registered email". Try to use one of those services and, respectfully, you'll end up as a laughing-stock. But that is where you're headed regardless.

\* "Laughing-stock" reminds me of a more important point. Attorneys don't like to be embarrassed.

I've had two attorneys, as I've implied, literally leave their firms out of fear of prosecution (in one case) and Federal investigation (in the other). Another who'd overreached to the point of pretty much unavoidable disbarment literally begged me not to go to the State Bar. "We can work this out! We can work this out!" Chuckle.

But, really, what attorneys are about is awe and mystery related to the smoke and mirrors that they surround themselves with. I like to take that away.

I have just one skill, Ms. Long. A talent, actually. I didn't earn it. It was nascent at age 4. It manifested in a memorable way at age 6. I should have run with it after that instead of burying it until the blackhat came for me in 2013.

But my father, a true Jihadi, used to beat me up if I showed signs of being different. How could I talk about a difference that would be considered ungodly as opposed to a gift?

There are things you can do that I can't do. But sometimes I'm able to see that which is hidden. I'm the Rain Man as opposed to Sheldon. I pretend to be as neurotypical as Sheldon is. But savant and me are sitting in a tree being what we must be.

I know which parts of what you do are defensible and which parts can be used, in a legitimate and reasonable sense that is consistent with U.S. laws, to deal with the type of criminal that you are properly and efficiently.

Tell me a little about your life, too, just a little, and I'll offer things back to you that you'll find interesting and useful. Think of me as Aunt Coder, a kindly Gypsy Queen with a colorful deck of cards. As you approach 50, just months away, what would you like to know about yourself and the meaning of your life?

Talk to me, Christine. In a positive and productive spirit, and for legitimate and reasonable purposes that are consistent with U.S. laws, let me see the rest of what you are.

I made a similar offer to Opposing Counsel in 2012. To every attorney involved. They seemed reluctant to talk. I remember complaining to them that it was like radar echoing into the void. But they gave me enough and you'll do the same.

### Addressing Jihadi "Mark" Hashimi and attorney Christine Long - Jan. 16, 2022

\* Forrest Gump's mother had sage advice for Forrest. Do you remember the advice?

I'm chuckling again. If it's all right to make a joke, you're not able to see the Forrest for the trees. Did it never occur to you – to anybody in the muck and mire of the Khachaturian organized-crime orbit – to find out what I am before jumping to conclusions?

Why in the world would all of you assume that only one person in the current matter had some proficiency with information? Or, if one person was more adept, who that person might be? Folks, here's a favorite YouTube video:

https://www.voutube.com/watch?v=X9uk9IcoQ0w

It's Primus's version of "Devil Went Down to Georgia". Listen to the taunt that the fiddler offers the Devil at the end. I'm the fiddler.

\* I'll make one other pop-culture allusion. Did the Khachaturians ever read the story of the Tar Baby? No, the term isn't politically incorrect. I'm referring to the 1881 story. It's instructive and should be added to the list of things to reflect on.

It's just a thought, but the wine-and-brie organized-crime family that's paying you to tidy up the embarrassing disclosure of RICO-level organized crime combined with the awkward and distasteful hate-crimes that it's supported should consider the lessons that are to be learned from Br'er Rabbit's miscalculation.

But, you know, in a pleasant and humorous sense, if you'd like to dance, O mighty mob enforcer, let's dance. I'm up for it.

I'm discussing this with associates. BTW I can't be compelled to reveal identities, not in all cases, if I don't know all identities.

We agree you understand that nobody but me presently controls the websites. That will change, of course, as copies migrate to servers located around the world. But if you understand the current situation, what is it that you're trying to do?

There is obviously a plan. But the only option that I can see which you might be trying for is so much of a violation that you know even the sleepy State Bar will take notice. Even dead-tree media might do so.

As a related note, if I can get the EFF involved, your career is most likely toast. Regrettably, the primary card that I might have been able to play in that context is dead but I'm looking at the new cards in my Gypsy Queen hand.

# EXHIBIT C

From: Christine Long Review <section230@boldcoder.org>

Sent: Sunday, January 16, 2022 9:01 PM

To: Long, Christine H. <Christine.Long@berliner.com>; Christine Long <sunnyp716@gmail.com>; Mark Hashimi

<markhashimi@fremonttoyota.com>; Daphne Kavich <dkavich@yahoo.com>

Cc: More Christine Long <a href="mailto:com">cc: More Christine Long@berliner.com</a>; C. Long <a href="mailto:com">cchristong@att.net</a>; Raffi Hashemi <a href="mailto:com">carlasht15@gmail.com</a>; Daphne Kavich <a href="mailto:com">carlasht15@gmail.com</a>; Natasha Khachaturian <a href="mailto:com">christong@att.net</a>; Raffi Hashemi <a href="mailto:com">carlasht15@gmail.com</a>; Daphne Kavich <a href="mailto:com">carlasht15@gmail.com</a>; Natasha Khachaturian <a href="mailto:com">carlasht15@gmail.com</a>; Daphne Kavich <a href="mailto:com">carlasht15@gmail.com</a>; Natasha Khachaturian <a href="mailto:com">carlasht15@gmail.com</a>; Natasha

Subject: Mark Hashimi inquiry

#### **EXTERNAL EMAIL**

#### Christine:

This copy is going from a different account to different accounts of yours. The attached PDF is addressed to "Mark" and to you. It's downloadable as well from the new Christine Long site that's linked in the document.

For points related to the use of domain names and other information, please see the PDF.

The PDF is, of course, going to a number of people in multiple U.S.

States. As noted in the document, I managed to get one of these things to 20% of the population of a U.S. city in 2020. I was pretty proud of that.

I was sorry to see that you'd lost your parents prior to their reaching old age. But if they were superior to mine, it's better to have good people for a short period than bad people for an extended one.

## **EXHIBIT D**

From: far.traveler < far.traveler@protonmail.com >

Sent: Monday, January 17, 2022 6:27 AM

To: Long, Christine H. < Christine.Long@berliner.com>

Cc: Christine Long <sunnyp716@gmail.com>; Christine Long <travellong72@yahoo.com>; Long,

Christine H. < Christine.Long@berliner.com>

Subject: DMCA and Christine Long photo on dot-attorney site

### EXTERNAL EMAIL

Managing and other partners at Berliner-Cohen:

I'm a bit surprised. Abuse of process is fine with your type, but you've assigned to Ms. Long, or she's volunteered for, a case that is likely to be personally embarrassing to some of you for years to come. If the statement seems laughable to such impressive attorneys, allow me to explain in more detail in due course.

I think perhaps you might want to take a closer look at what you've stepped in. I don't mean the millions of dollars in stolen funds; I mean the miscalculation in just how far your firm has overreached in the current instance of abuse of process. It does seem egregious enough to be prosecutable as opposed to simply a civil tort.

The attached PDF doesn't cover the legal situation except for the Jihadi hate-speech part at Fremont-Toyota. It's more of a casual and reflective introduction that I've offered Christine.

It does note that your firm seems to have served somebody who you knew had no responsibility for the bulk of what was in a complaint. I feel that technically prosecution is an option for however far up the management ladder such a bone-headed move goes.

The PDF is, at any rate, a starting point for review. Communication can go to the email address listed further down.

You might receive 2 copies of this letter. If this happens, please excuse any duplicates. Thank you for your time.

BTW If one of you elects to reply, in addition to using the address listed further down, explain why you changed your mind relative to last Summer. If the Khachaturian heirs told you that there was a blank check and to do whatever was necessary, they wouldn't ask questions, I'm going to need to go to the Feds.

If you have somebody on board who does RICO defense, have him or her explain to me why RICO doesn't apply to the current matter. I think that there's enough going on with the Armenian Church part of it to satisfy the requirement that organized crime needs to cross state lines.

ATTN: Christine H. Long

Christine, Hi. I thought I'd save us both some time and indicate that the Berliner-Cohen photo of you that I'm using initially on the new site probably isn't DMCA-able. It's simply a link to the copy that's hosted on your side.

Links are DMCA-able in some cases, but probably not in this one. But have your I.P. department write to the following address if they'd like to go round on this:

### me@christinelong.attorney

The website is, of course: https://christinelong.attorney/

BTW You seem brighter than one woman, a drunk barratry type, that I dealt with in the past few years. She tried to pontificate on legal matters that she knew less about than a normal Pro Per would know. The point is that you should probably stick to your specialties. Don't guess at things and you won't make a fool of yourself and waste time for both of us.

If you're tempted to say the same thing to me, I haven't been left with much choice, have I?

Regarding the current matter, I'm still trying to imagine what's in your head. You \*have\* committed a prosecutable crime and, more importantly to your type, you're playing with the potential for publicity that would immediately end any "rising star" status that you still possess.

One way or the other, your career is actually on the line here.

## EXHIBIT E

From: Christine Long Review <<u>section230@boldcoder.org</u>>
To: Phillip Long <<u>pilong28@yahoo.com</u>>
Cc: Amber Long <<u>amberdlong@yahoo.com</u>>
Sent: Sunday, January 16, 2022, 08:45:23 PM PST
Subject: Asking about Christine

Phillip and Amber, good day.

If you're Christine's brother and sister, is one of you able to forward the attached 14-page PDF to her?

Additionally, Christine is likely to be the subject of one chapter in a book in progress. Is either of you able to comment on her practice, motivations, and character?

## EXHIBIT F

From: <me@christinelong.attorney> Date: Mon, Jan 17, 2022 at 7:00 AM

Subject: DMCA and Christine Long photo on dot-attorney site

To: Eileen Kennedy <epk@berliner.com>

CC: Jill McVey < imcvey717@yahoo.com >, Christian Picone < cepicone@gmail.com >, Christian Picone

< idhltd@yahoo.com >, Christian Picone < christianpicone@cs.com >, Dawn Cherie Sweatt < dch@svlg.com >, Dawn Sweatt

<id><idifazio@gmail.com>, Kevin Sweatt <kevinsweatt@yahoo.com>

Jill McVey: If you're associated with Christian Picone, a forward is

requested.

Kevin Sweatt: Similar request. Forward to Dawn Sweatt.

Managing and other partners at Berliner-Cohen:

I'm a bit surprised. Abuse of process is fine with your type, but you've assigned to Ms. Long, or she's volunteered for, a case that is likely to be personally embarrassing to some of you for years to come. If the statement seems laughable to such impressive attorneys, allow me to explain in more detail in due course.

I think perhaps you might want to take a closer look at what you've stepped in. I don't mean the millions of dollars in stolen funds; I mean the miscalculation in just how far your firm has overreached in the current instance of abuse of process. It does seem egregious enough to be prosecutable as opposed to simply a civil tort.

The attached PDF doesn't cover the legal situation except for the Jihadi hate-speech part at Fremont-Toyota. It's more of a casual and reflective introduction that I've offered Christine.

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The PDF is, at any rate, a starting point for review. Communication can

go to the email address listed further down.

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If you have somebody on board who does RICO defense, have him or her explain to me why RICO doesn't apply to the current matter. I think that there's enough going on with the Armenian Church part of it to satisfy the requirement that organized crime needs to cross state lines.

ATTN: Christine H. Long

Christine, Hi. I thought I'd save us both some time and indicate that the Berliner-Cohen photo of you that I'm using initially on the new site probably isn't DMCA-able. It's simply a link to the copy that's hosted on your side.

Links are DMCA-able in some cases, but probably not in this one. But have your I.P. department write to the following address if they'd like to go round on this:

me@christinelong.attorney

The website is, of course: https://christinelong.attorney/

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If you're tempted to say the same thing to me, I haven't been left with much choice, have I?

Regarding the current matter, I'm still trying to imagine what's in your head. You \*have\* committed a prosecutable crime and, more importantly to your type, you're playing with the potential for publicity that would immediately end any "rising star" status that you still possess.

One way or the other, your career is actually on the line here.

CEP

## EXHIBIT G

From:

Robert Kiraly <me@boldcoder.org>

Sent:

Tuesday, January 18, 2022 1:13 PM

To:

**Electronic Frontier Foundation** 

Cc:

Long, Christine H.; Mark Hashimi; Mark Hashimi; Christine Long; Bishop, Susan; Natasha

Khachaturian; Casad, Steven; Joshua Borger; Susan Bishop; Wolf, Jonathan D.; Aaron

Valenti

Subject:

EFF: Odd website CLETS case

#### **EXTERNAL EMAIL**

#### ATTN: Electronic Frontier Foundation

I'm a senior citizen, an engineer and writer, and an activist in terms of websites and legal issues for the last 10 years.

Last Summer, a P.I. in the S.F. Bay Area named Brian Martin asked me to help him assemble evidence related to an auto loan fraud case.

Related note: Brian has had a Fox TV series made about him. The genre was Reality P.I. Fox is sensationalist and this is partly about literal Jihadi Muslims. I'm not kidding. So, I'm not fond of Fox, but I'm thinking of calling them to see if they'll wade into it on the publicity side.

A review last Summer turned up plenty of evidence. An ex-employee of the auto dealership, Sam Pawar, has told me that the dealership has committed millions of dollars in fraud of different types and engages in hate speech and hate crimes as well.

The hate-speech part is related to what is known as external jihad.

Internal jihad is philosophical; i.e., "al-jihad fi sabil Allah".

External jihad is about harassment up to and including physical violence and terrorism. This is a well-defined external jihad group. It has a formal legal existence due to a past Court case.

So, I put up some websites. The dealership tried to get Berliner-Cohen of San Jose to sue to take them down. The law firm declined to do so at the time.

6 months later, last week, the P.I. was hit out of the blue with a workplace violence CLETS. It's solely about the websites — which the P.I. doesn't control.

It appears that the law firm -- it's Berliner-Cohen again -- intends to do some sort of end run around the usual obstacles to taking down websites. This is egregious abuse of process.

They're hoping that Brian won't get representation and to steam-roller him with noise despite the complete lack of relevant allegations of any type. I went through this myself 10 years ago, so I know how it works.

If they get an RO [he's under a TRO presently] they'll try some sort of trick to force me to take down the sites even though I won't have had a day in Court.

I've told Opposing Counsel, Christine Long, that she belongs in prison. It's true, but that and 50 cents won't buy a newspaper.

I can provide piles of details and these actually are Jihadis involved in long-term organized crime. The idea that websites can be taken down just because the owners -- the Khachaturian heirs -- are wealthy is unacceptable.

Is one of the EFF people willing to look at this? If there's a response, I'll link whoever writes to the websites in question and answer any questions.

In the interim, a police report, a State Bar complaint, a suit for 6 figures in abuse of process damages, and publicity measures are under consideration.

I'm also thinking of turning control of copies of the websites over to Anonymous and groups of a similar nature. There are Free Speech and anti-crime advocates in a few countries who will be willing to become involved as well.

There certainly won't be a takedown that doesn't lead to more copies of the websites out there.

If the EFF is able to offer advice related to Streisand Effect, it would be appreciated.

I think that publicity, possibly courtesy of Streisand Effect, is the best approach here.

One thing that I've learned in a decade of this is that senior partners don't appreciate being made to look like fools.

And, geez, as Bugs Bunny used to say, this case is likely to cast Ms.
Bishop, Mr. Borger, Mr. Casad, and others at Berliner-Cohen in the role of mah-roons.

# EXHIBIT H

From: Susan Bishop Review < susan.bishop@markhashimi.org>

Sent: Thursday, January 20, 2022 1:36 AM

To: Shewey, Tyler < Tyler. Shewey@berliner.com>

Cc: Tyler Shewey < tyler.shewey@nyu.edu>; Tyler Shewey < bshewey@aol.com>; Sandra Shewey < sandy@interiorplantdesign.com>; Sandra Shewey < sandy@herbspoolservice.com>; Sandra Shewey

<sshewey@sbcglobal.net>; Jerry Shewey <jerryshewey@gmail.com>; Jerry Shewey

<a href="mailto:daves@rentalmgmt.com">daves@rentalmgmt.com</a>; David Shewey <a href="mailto:daves@sheweyrealty.com">daves@rentalmgmt.com</a>; Kevin Shewey

<kevinshewey@gmail.com>

Subject: State Bar related request

#### **EXTERNAL EMAIL**

Sandra, David, Jerry, and Kevin, if you're related to Tyler, please forward.

Note: The current matter has no connection to you other than the forward request. In fact, it may or may not have a connection to Tyler depending on the answers to the questions raised herein. This is just preliminary research related to legitimate and reasonable steps that are consistent with and arguably protected under U.S. laws.

ATTN: Tyler Shewey

Mr. Shewey, good morning. I'm respectfully requesting the information that's described further down.

I don't as of yet assert that any party who receives this request is explicitly required under the Law or a code of conduct to respond.

However, if I don't receive a complete and polite response in the short term, I feel the circumstances are unusual enough that it would be appropriate to start work on a State Bar filing.

The filing, if one is made at this time, wouldn't assert formal standing on my part in any current case.

It would simply ask the State Bar to consider asking your office to respond in the interests of fewer of you facing administrative and/or legal consequences down the road.

The filing would, of course, note that a prosecutable crime of a new order of magnitude has been committed by an attorney in your office and by such attorneys as directed her to commit the prosecutable crime or acted as accessories to the prosecutable crime either before or after the fact.

The attached PDF will provide some context but only to a limited extent.

It's mostly a reflective introduction for Christine Long though the list of questions for Jihadi "Mark"

Hashimi will be of interest to those of the partners who'd prefer to keep embarrassment to the minimum possible.

It'll work best if you visit one or more of the three websites involved in the matter of interest. The three sites include Fremont-Toyota Auto Loan Fraud, Jihadi "Mark" Hashimi, and Christine Long Review. The first two sites are in search engines. The third site is new and so it doesn't show up yet.

I think that two of the sites are listed in the PDF. However, a quick way to get to them is to type "Mark Hashimi" into any search engine. For Bing or Duck Duck Go, one of the sites should show up in the top few listings. For Google, it'll be in the bottom half of the page.

After you get to the Jihadi "Mark" Hashimi site, use the dark navigation buttons near the top of each page to review the different sites and pages.

I anticipate that the search string "Christine Long" will work as well in the future. However, that might take months. In the end, though, I usually end up with short-tail. I always say, short-tail is better than tail.

If you like, similar positive results can be arranged where appropriate for other attorneys at the San Jose office.

There certainly is going to be such a setup, for legitimate and reasonable purposes that are consistent with and arguably protected under U.S. laws, for attorneys at any level, senior or junior, who bear any responsibility for recent decisions once the attorneys in question are identified.

The information requested is as follows:

Who or what entity is the owner of Berliner-Cohen, the entity as a whole? What is the organizational structure of the San Jose office in terms of decision-making authority? Is it two-level in the sense that there are senior and junior partners with HR and subordinate staff below that or off to the side as part of the parent entity? Who is legally responsible for vetting whether or not a particular case should be accepted and should proceed?

In closing, there are two side notes:

- (a) I've settled on Luxembourg, Bulgaria, and Russia as the first three regions for the site copies that I think I remembered to mention in the PDF. As a related technical point, neither I nor anybody else can be compelled to disclose the identities of parties that we don't know.
- (b) The odds that Fox News will pick up the story are only 1 in 3 but that's not too bad. It does seem possible because:
- \* Fox Network is sensationalist
- \* The story is about an actual Jihadi group
- \* It even has an ironic legal identity due to past litigation
- \* The U.S. EEOC has already vetted some of the preceding claims
- \* There are millions of dollars in organized-crime activities
- \* The stolen money gets funneled to a well-known Church
- \* The people who control the crime ring have gone after a P.I.
- \* Who happens to be a polite and respected law-enforcement type
- \* And one of Fox Network's former stars
- \* To take down a 100% accurate whistleblower story on a website
- \* That the P.I. doesn't control

It's colorful and people like colorful. Even if Fox News doesn't pick this up, my guess is that any attorney who's associated with this glittering prize is likely to need to learn a new profession that they're more suited for such as poop scooper or possibly poop taster.

The question of the moment, though, is this: Which of the senior partners would like to step forward and proudly take responsibility for the purposes of future publicity and/or administrative or legal filings?

## **EXHIBIT I**

From: me@fremonttoyota.org <me@fremonttoyota.org>

Sent: Tuesday, July 6, 2021 11:44 AM

To: Cheng, Mike < Mike. Cheng@berliner.com >

Cc: markhashimi@gmail.com; anna.vierra@gmail.com; alocozyi@sbcglobal.net

Subject: Fremont-Toyota case

[External Email]

Mr. Cheng, good day.

Could you forward this letter to whoever in your San Jose office has been visiting the Fremont-Toyota Loan Fraud site today? Note: I'm the editor and site host. I see visits by somebody on staff but can't identify them by name.

If Berliner-Cohen elects to represent Fremont-Toyota or associated parties such as Kamal Sayed Hashimi aka "Mark" Hashimi, correspondence related to the site per se may be directed to the email address on this letter.

It should be noted that representation of the parties in question might lead to embarrassment for the firm as it's going to be close to #1 in Google for short-tail search.

Additionally, if the firm crosses the line into violations of standards or abuse of process, that might not go as well as the attorneys might hope.

Don't even think about trying for DMCA related to the photo of Hashimi.

He probably no longer possesses sole rights to the photo and there's a ton of Fair Use regardless.

Regarding use of the possible mark "fremonttoyota" in domain names, Fair Use and/or Nominative Use apply.

My advice is that the firm's potential clients back down promptly. I might add that I've never done an involuntary takedown in a decade and that two attorneys who threatened abuse of process, including the principal figure at one firm, ended up leaving their jobs.

Before anybody at Berliner-Cohen comments, it's respectfully suggested that a good look be taken at the text messages and email from Hugo Alcantar.