

1 JIMMIE DAVIS PARKER, ESQ. (SBN: 252023)
2 **LAW OFFICE OF JIMMIE DAVIS PARKER, APC**
3 4241 ARDEN WAY
4 SAN DIEGO, CALIFORNIA 92103
5 619-887-3300
6 JDParker@gmail.com

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
05/22/2018 at 09:50:00 AM
Clerk of the Superior Court
By Jessica Pascual, Deputy Clerk

7 Attorney for Plaintiffs Zhala Tawfiq,
8 Paris Kargar, and 3 Brothers Taco Shop, Inc. dba Tres Taqueria

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN DIEGO**

11 ZHALA TAWFIQ, *et al.*,) Case No.: 37-2017-00019692-CU-FR-CTL
12)
13 Plaintiffs,) [IMAGED FILE]
14 v.) [Assigned to Hon. Timothy Taylor for all purposes]
15 MISS MIDDLE EAST BEAUTY PAGEANT)
16 USA, INC., a California non-profit corporation, *et*) DECLARATION OF JIMMIE DAVIS
17 *al.*,) PARKER, ESQ. IN SUPPORT OF
18) PLAINTIFFS' MOTION TO DEEM FACTS
19 Defendants.) ADMITTED

20

21 ELI MALOUF, *et al.*,) Complaint Filed: May 31, 2017
22) Trial Date: None Set
23 Cross-Complainants,)
24 v.) Date: June 29, 2018
25) Time: 1:30 PM
26) Location: C-72

27 RAMI ATTALLAH)
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1 I, JIMMIE DAVIS PARKER, declare as follows:

2 1. I am an attorney, in good-standing, duly licensed to practice before all of the
3 courts of the State of California. I am one of the counsel of record for Plaintiffs in the above-
4 entitled action. I have personal knowledge of the matters stated herein and, if called upon,
5 I could and would competently testify thereto.

6 2. On April 4, 2018, the undersigned served Requests for Admission Set Two on
7 Kalasho Defendants redundantly by mail, by electronic service and upon both, Counsel of
8 Record, Mr. Liosi, and putative counsel, Mr. Finigan. Attached hereto as Exhibit A is a true
9 and correct copy of the RFAs at issue. Attached hereto as Exhibit B is a true and correct
10 copy of the Proof of Service memorializing the service.

11 3. The responsive deadline to the RFA was May 9, 2018 and no response has been
12 received as of the date of the instant filing. The last communication directed to the
13 undersigned from either Mr. Liosi or Mr. Finigan is February 7, 2018.

14 4. The RFA seeks admissions for 92 Requests (bringing the total requests
15 outstanding to 109). The RFA was accompanied by a declaration of counsel as required
16 under 2033.030, as the complexity of the case, number of parties and causes of action
17 necessitated the number of RFAs. Attached hereto as Exhibit C is a true and correct copy of
18 the Declaration of Counsel. See also, Exhibit B memorializing service of the same.

19 5. The undersigned's rate is \$395/hr. This Court has deemed undersigned's rate
20 reasonable. See ROA 129. The undersigned estimates that research and drafting of all
21 motion papers and presentation of argument at hearing will require 5 hours in total of
22 attorney time. The filing fee for the instant motion is \$60. The sum of these fees and costs
23 is \$2,035.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct. Executed on May 21, 2018, at San Diego, California.

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LAW OFFICES OF JIMMIE DAVIS PARKER, APC



By: _____

Jimmie Davis Parker, Esq.
Attorneys for Plaintiffs Zhala Tawfiq,
Three Brothers Taco Shop, Inc. and Paris
Kargar

Exhibit A

1 JIMMIE DAVIS PARKER, ESQ. (SBN: 252023)
2 **LAW OFFICE OF JIMMIE DAVIS PARKER, APC**
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4 SAN DIEGO, CALIFORNIA 92103
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7 Attorney for Plaintiffs Zhala Tawfiq,
8 Paris Kargar, 3 Brothers Taco Shop, Inc. dba Tres Taqueria

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN DIEGO**

12 ZHALA TAWFIQ, et al.

13 Plaintiffs,

14 v.

15 MISS MIDDLE EAST BEAUTY PAGEANT
16 USA, INC., a California non-profit corporation; et
17 al.,

18 Defendants.

) Case No.: 37-2017-00019692-CU-FR-CTL

) [IMAGED FILE]

) PLAINTIFFS REQUEST FOR
) ADMISSIONS TO KALASHO
) DEFENDANTS SET (TWO)

) [Assigned to Hon. Timothy Taylor for all purposes]

) Complaint Filed: May 31, 2017
) Trial Date: August 10, 2018

) Dept: C-72
) Date: N/A
) Time: N/A

1 PROPOUNDING PARTY: ZHALA TAWFIQ, PARIS KARGAR, 3 BROTHERS TACO SHOP,
2 INC. dba TRES TAQUERIA,

3
4 RESPONDING PARTY: MISS MIDDLE EAST BEAUTY PAGEANT USA, INC., a
5 California non-profit corporation; BESSMON KALASHO, an individual; JESSICA KALASHO, an
6 individual; BESSMON KALASHO AND JESSICA KALASHO, a married couple, dba “Miss
7 Middle East USA Beauty Pageant”; MIDDLE EASTERN CHAMBER OF COMMERCE fka SAN
8 DIEGO EAST COUNTY CHALDEAN AMERICAN CHAMBER OF COMMERCE, a suspended
9 California non-profit corporation;

10
11 SET NO: TWO

12 Pursuant to Code of Civil Procedure sections 2033.010, *et seq.*, Plaintiffs, ZHALA
13 TAWFIQ, PARIS KARGAR, 3 BROTHERS TACO SHOP, INC. dba TRES TAQUERIA request
14 that you answer the following Requests for Admission in writing and under oath within
15 30 days after service of these Requests. Concurrently served with these Requests for
16 Admissions is Form Interrogatory Set Three (Request Number 17.1) to each
17 Responding Party.

18 **DEFINITIONS**

19 A. As used herein, the words “YOU” or “YOUR” refers to all Defendants
20 named as RESPONDING PARTIES above, including but not limited to their employees,
21 agents, servants, and attorneys; specifically, BESSMON KALASHO and JESSICA
22 DEDDEH (KALASHO). If the request cannot be answered the same way by each
23 defendant, please submit separate responses.

24 B. All dates and times used herein refer to the timezone of California, United
25 States.

26 C. The term JESSICA KALASHO shall mean JESSICA DEDDEH and vice versa.

27 D. The term CHAMBER refers to Defendant Middle Eastern Chamber of
28 Commerce, formerly known as San Diego East County Chaldean American Chamber of

1 Commerce.

2 E. The term PAGEANT refers to MISS MIDDLE EAST BEAUTY PAGEANT
3 USA, INC.

4 F. The term BEAUTY CONTEST refers to the 2016 Miss Middle East Beauty
5 Pageant held on or about May 19, 2016.

6 G. The term FALSIFIED NUDE IMAGES refers to the images of one or more
7 nude females altered to appear to be images of Plaintiff Zhala Tawfiq and published
8 publicly on Instagram on April 7, 2017.

9 H. The terms PUBLISHED or PUBLISHING refer to the act of publishing
10 statements or images on any internet website including social media platforms with the
11 intent that the content is available for public consumption.

12 I. The term TACO POLL refers to the "Best Mexican Food in El Cajon Contest"
13 PUBLISHED by the CHAMBER on October 14, 2016.

14 J. The term ATTORNEY POLL refers to the "The Best Lawyers in San Diego
15 Public Poll" PUBLISHED by the CHAMBER on June 4, 2015.

16 K. The term RELEVANT TIME PERIOD means from January 2008 to December
17 31, 2017, and/or from inception to termination as appropriate.

18 L. The term HOTEL means the "Hilton San Diego Mission Valley" and/or the
19 location that the BEAUTY PAGEANT occurred.

20 **Requests for Admission**

21
22 11. Admit JESSICA KALASHO and/or BESSMON KALASHO wholly owned
23 and controlled Defendant CHAMBER during the RELEVANT TIME PERIOD.

24 12. Admit JESSICA KALASHO and/or BESSMON KALASHO wholly owned
25 and controlled Defendant PAGEANT during the RELEVANT TIME PERIOD.

26 13. Admit that the BEAUTY CONTEST was produced, owned, directed and
27 operated exclusively by BESSMON KALASHO and/or JESSICA KALASHO.
28

1 14. Admit that the BEAUTY CONTEST was produced and operated as a sole
2 proprietorship under the ownership and control of BESSMON KALASHO and/or
3 JESSICA KALASHO.

4 15. Admit JESSICA KALASHO and/or BESSMON KALASHO are the only
5 employees of Defendant CHAMBER during the RELEVANT TIME PERIOD.

6 16. Admit JESSICA KALASHO and/or BESSMON KALASHO are exclusively
7 the CHAMBER's officers, directors, managing agents, and/or executives during the
8 RELEVANT TIME PERIOD.

9 17. Admit JESSICA KALASHO and/or BESSMON KALASHO are exclusively
10 the PAGEANT's officers, directors, managing agents, and/or executives during the
11 RELEVANT TIME PERIOD.

12 18. Admit the PAGEANT is undercapitalized and was undercapitlzied at
13 inception.

14 19. Admit that the CHAMBER is undercapitalized and was undercapitlzied at
15 inception.

16 20. Admit JESSICA KALASHO and/or BESSMON KALASHO exclusively held
17 access to the CHAMBER's Facebook account during the RELEVANT TIME PERIOD.

18 21. Admit JESSICA KALASHO and/or BESSMON KALASHO exclusively held
19 access to the PAGEANT's Facebook account during the RELEVANT TIME PERIOD.

20 22. Admit JESSICA KALASHO and/or BESSMON KALASHO exclusively held
21 access to the CHAMBER's Instagram account during the RELEVANT TIME PERIOD.

22 23. Admit the screenshot attached hereto as Exhibit A is a true and correct
23 representation of the CHAMBER's Facebook account.

24 24. Admit the screenshot attached hereto as Exhibit B is a true and correct
25 representation of the PAGEANT's Facebook account.

26 25. Admit YOU created, controlled and deleted the Facebook account with the
27 alias "Melissa Pierson" during the RELEVANT TIME PERIOD.

28 26. Admit YOU deleted the Facebook account with the alias "Melissa Pierson"
on or about June 26, 2017.

1 27. Admit the screenshot attached hereto as Exhibit C is a true and correct
2 representation of the Facebook account of "Melissa Pierson."

3 28. Admit YOU PUBLISHED all content including but not limited to comments
4 that appear from the alias Facebook account of "Melissa Pierson" during the RELEVANT
5 TIME PERIOD.

6 29. Admit YOU created, controlled and deleted the Facebook account with the
7 alias "Robert Forbes" aka "Robert Sanger" during the RELEVANT TIME PERIOD.

8 30. Admit YOU deleted the Facebook Account with the alias "Robert Forbes"
9 aka "Robert Sanger" on or about June 26, 2017.

10 31. Admit the screenshot attached hereto as Exhibit D is a true and correct
11 representation of Facebook activity of the account of "Robert Forbes" aka "Robert Sanger."

12 32. Admit YOU PUBLISHED all content including but not limited to comments
13 that appear from the alias Facebook account of "Robert Forbes" aka "Robert Sanger"
14 during the RELEVANT TIME PERIOD.

15 33. Admit YOU created, controlled and deleted the Facebook account with the
16 alias "Ben George" during the RELEVANT TIME PERIOD.

17 34. Admit YOU deleted the Facebook account with the alias "Ben George" on or
18 about June 26, 2017.

19 35. Admit the screenshot attached hereto as Exhibit E is a true and correct
20 representation of the Facebook account of "Ben George."

21 36. Admit YOU PUBLISHED all content including but not limited to comments
22 that appear from the alias Facebook account of "Ben George" during the RELEVANT
23 TIME PERIOD.

24 37. Admit BESSMON KALASHO conducted filmed-one-on-one interviews, with
25 each BEAUTY PAGEANT contestant alone in a room at the HOTEL in or around May
26 2016.

27 38. Admit BESSMON KALASHO conducted a filmed-one-on-one interview
28 with Plaintiff ZHALA TAWFIQ alone in a room at the HOTEL in or around May 2016.

1 39. Admit BESSMON KALASHO conducted a filmed-one-on-one interview
2 with Plaintiff PARIS KARGAR alone in a room at the HOTEL in or around May 2016.

3 40. Admit after July 2017 YOU destroyed the videos of the interviews BESSMON
4 KALASHO conducted with BEAUTY PAGEANT contestants.

5 41. Admit YOU hired MATRIX PHOTOGRAPHY, INC. to film the BEAUTY
6 PAGEANT.

7 42. Admit YOU physically obtained the only copy of the film that MATRIX
8 PHOTOGRAPHY, INC. recorded of the BEAUTY PAGEANT.

9 43. Admit after July 2017 YOU destroyed the film that MATRIX
10 PHOTOGRAPHY, INC. recorded of the BEAUTY PAGEANT.

11 44. Admit BESSMON KALASHO and/or JESSICA KALASHO PUBLISHED the
12 TACO POLL.

13 45. Admit that the TACO POLL results PUBLISHED by YOU on Facebook were
14 untrue.

15 46. Admit that Exhibit F attached hereto is a true and correct representation of
16 YOUR solicitation to the general public to vote on the TACO POLL.

17 47. Admit that Exhibit G attached hereto is a true and correct representation of
18 the purported results that YOU PUBLISHED of the TACO POLL.

19 48. Admit that Exhibit H attached hereto is a true and correct representation
20 of YOUR solicitation to the general public to vote on the ATTORNEY POLL.

21 49. Admit that Exhibit I attached hereto is a true and correct representation of
22 the purported results that YOU PUBLISHED of the ATTORNEY POLL.

23 50. Admit that the TACO POLL only received one vote before YOU PUBLISHED
24 the alleged results.

25 51. Admit that YOU PUBLISHED the TACO POLL in retaliation for Mr. Duraid
26 Hallack's refusal to post BESSMON KALASHO campaign signs at TRES TAQUERIA.

27 52. Admit that YOU PUBLISHED the TACO POLL with the intent to defame
28 TRES TAQUERIA.

 53. Admit that the TACO POLL was a pretense to defame TRES TAQUERIA.

1 54. Admit that the ATTORNEY POLL results posted by YOU on Facebook were
2 untrue.

3 55. Admit that YOU PUBLISHED the ATTORNEY POLL in retaliation for LINA
4 CHARRY successfully prosecuting claims against YOU.

5 56. Admit that YOU PUBLISHED the ATTORNEY POLL with the intent to
6 defame LINA CHARRY.

7 57. Admit that the ATTORNEY POLL was a pretense to defame LINA
8 CHARRY.

9 58. Admit that YOU used Jotform.com to host the TACO POLL.

10 59. Admit that YOU used Jotform.com to host the ATTORNEY POLL.

11 60. Admit that Exhibit J attached hereto is the true and correct vote tallies for the
12 TACO POLL.

13 61. Admit that Exhibit K attached hereto is the true and correct vote tallies for
14 the ATTORNEY POLL.

15 62. Admit YOU PUBLISHED the following comment on the CHAMBER's
16 Facebook page on or about October 19, 2016 under the alias "Robert Forbes": "I ate at
17 TRES and got really really sick. I don't know how Hollywood Casino Jamul-San Diego
18 has them in their food court area. Don't think they will last long."

19 63. Admit the following comment on the CHAMBER's Facebook page
20 PUBLISHED under the alias "Robert Forbes" is untrue: "I ate at TRES and got really really
21 sick. I don't know how Hollywood Casino Jamul-San Diego has them in their food court
22 area. Don't think they will last long."

23 64. Admit YOU PUBLISHED the following comment on the CHAMBER's
24 Facebook page on or about October 19, 2016 under the alias "Ben George": "I went to
25 TRES and ordered rolled tacos. They were dry and I got really sick and ended up with
26 food poisoning. If you guys want, I can do a video about my experience and you guys can
27 share it. Hollywood Casino Jamul-San Diego better wake up."

28 65. Admit the following comment on the CHAMBER's Facebook page
PUBLISHED under the alias "Ben George" is untrue: "I went to TRES and ordered rolled

1 tacos. They were dry and I got really sick and ended up with food poisoning. If you guys
2 want, I can do a video about my experience and you guys can share it. Hollywood Casino
3 Jamul-San Diego better wake up.”

4 66. Admit you PUBLISHED defamatory statements about TRES TAQUERIA
5 with the intention of harming TRES TAQUERIA or or about October 19, 2016.

6 67. Admit you PUBLISHED defamatory statements about LINA CHARRY
7 under alias account of “Melissa Pierson.”

8 68. Admit you PUBLISHED defamatory statements about LINA CHARRY
9 under alias account of “Melissa Pierson.”

10 69. Admit that YOU created the FALSIFIED NUDE PHOTOS.

11 70. Admit that YOU created the FALSIFIED NUDE PHOTOS intending to cause
12 Plaintiff Zhala Tawfiq emotional distress.

13 71. Admit that YOU created the FALSIFIED NUDE PHOTOS intending to cause
14 Plaintiff Zhala Tawfiq severe emotional distress.

15 72. Admit that YOU knew that the FALSIFIED NUDE PHOTOS were not of
16 Plaintiff Zhala Tawfiq.

17 73. Admit that YOU PUBLISHED the FALSIFIED NUDE PHOTOS.

18 74. Admit that YOU PUBLISHED the FALSIFIED NUDE PHOTOS intending to
19 cause Plaintiff Zhala Tawfiq emotional distress.

20 75. Admit that YOU PUBLISHED the FALSIFIED NUDE PHOTOS intending to
21 cause Plaintiff Zhala Tawfiq severe emotional distress.

22 76. Admit that YOU PUBLISHED the FALSIFIED NUDE PHOTOS intending to
23 defame Plaintiff Zhala Tawfiq.

24 77. Admit that YOU PUBLISHED the FALSIFIED NUDE PHOTOS with
25 disregard as to whether the act of PUBLISHING the FALSIFIED NUDE PHOTOS would
26 cause Plaintiff Zhala Tawfiq emotional distress.

27 78. Admit that on April 7, 2017, YOU, acting in concert with Defendant
28 Stephanie Malouf, caused the PUBLISHING of the FALSIFIED NUDE PHOTOS.

1 79. Admit that on April 7, 2017, YOU, acting in concert with Defendant Elie
2 Malouf, caused the PUBLISHING of the FALSIFIED NUDE PHOTOS.

3 80. Admit that the act of PUBLISHING the FALSIFIED NUDE PHOTOS caused
4 severe emotional distress to Plaintiff Zhala Tawfiq.

5 81. Admit that YOU knew that Plaintiff Zhala Tawfiq was particularly
6 vulnerable to suffering emotional distress via the PUBLISHING of the FALSIFIED NUDE
7 PHOTOS given her position as Miss Middle East 2016.

8 82. Admit that BESSMON KALASHO alone tallied the votes for BEAUTY
9 CONTEST.

10 83. Admit that YOU represented that the BEAUTY CONTEST would be an
11 impartial contest the results of which would be based on the impartial voting of all judges.

12 84. Admit that YOU never intended that the BEAUTY CONTEST would be an
13 impartial contest, and that the winner would be hand-selected by YOU.

14 85. Admit that YOU promised the winner of the BEAUTY CONTEST \$2,000 in
15 cash.

16 86. Admit that YOU never provided the 2016 Winner with \$2,000 in cash
17 winnings.

18 87. Admit that at the time you made the representation that the winner of the
19 BEAUTY CONTEST would receive \$2,000, YOU knew it was false.

20 88. Admit that YOU promised other prizes including cosmetic teeth whitening,
21 television commercials and clothing to the winner of the BEAUTY CONTEST that was
22 never provided to the winner.

23 89. Admit that YOU never intended on providing the winner of the BEAUTY
24 CONTEST the prizes YOU represented would be earned by the winner.

25 90. Admit that YOU wrongfully removed Plaintiff ZHALA TAWFIQ from the
26 PAGEANT's website as the 2016 winner.

27 91. Admit that YOU removed Plaintiff ZHALA TAWFIQ from the PAGEANT's
28 website as the 2016 winner with the intention of inflicting severe emotional distress upon
ZHALA TAWFIQ.

1 92. Admit that YOU commented on Plaintiff PARIS KARGAR's appearance
2 including her breasts.

3 93. Admit that YOU commented on Plaintiff PARIS KARGAR's breasts in
4 public, repeatedly and in front of numerous strangers.

5 94. Admit that when you commented on Plaintiff PARIS KARGAR's breasts you
6 intended to inflict severe emotional distress.

7 95. Admit that when YOU commented on Plaintiff PARIS KARGAR's breasts
8 you did so without regard to PARIS KARGAR's well-being.

9 96. Admit that when YOU commented on Plaintiff PARIS KARGAR's breasts
10 you did so without regard to PARIS KARGAR's well-being.

11 97. Admit BESSMON KALASHO propositioned Plaintiff Paris Kargar for sex in
12 exchange to ensure she won the BEAUTY CONTEST.

13 98. Admit that BESSMON KALASHO propositioned Plaintiff Paris Kargar for
14 sex at the HOTEL.

15 99. Admit that YOU told Plaintiff Paris Kargar words to the effect that her
16 declination of BESSMON KALASHO's sex proposition resulted in her not winning the
17 BEAUTY CONTEST.

18 100. Admit YOU intended to inflict severe emotional distress when YOU told
19 Plaintiff Paris Kargar words to the effect that her declination of BESSMON KALASHO's
20 sex proposition resulted in her not winning the BEAUTY CONTEST.

21 101. Admit that in or around May 2016, BESSMON KALASHO whispered into
22 the ear of Plaintiff Paris Kargar "you are so fucking hot, I cannot take my eyes off of you."

23 102. Admit that YOU denied Plaintiff Paris Kargar the opportunity to win the
24 BEAUTY CONTEST.

25 103. Admit that BESSMON KALASHO AND JESSICA KALASHO have a
26 combined net worth exceeding \$1,000,000.

27 104. Admit that BESSMON KALASHO AND JESSICA KALASHO have a
28 combined net worth exceeding \$5,000,000.

1 105. Admit that BESSMON KALASHO AND JESSICA KALASHO have a
2 combined net worth exceeding \$10,000,000.

3 106. Admit YOU have a large social media following that reaches and influences
4 hundreds of thousands of people.

5 107. Admit that YOU engage in a pattern and practice of unlawful, despicable
6 and outrageous retaliatory conduct against those with whom YOU are in disputes.

7 108. Admit YOU collected at least \$50 from each BEAUTY CONTEST contestant
8 as an entry fee.

9 109. Admit attached hereto as Exhibit L is a true and correct copy (slightly
10 obscured) of the FALSIFIED NUDE PHOTOS that YOU PUBLISHED.

11
12 DATED: April 4, 2018

LAW OFFICE OF JIMMIE DAVIS PARKER, APC

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16 

17 JIMMIE DAVIS PARKER, ESQ.
18 4241 Arden Way
19 San Diego, CA 92103
20 Telephone: 619/887-3300
21 Email: jdparker@gmail.com
22 Attorney for Plaintiff
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Exhibit A



Middle Eastern Chamber of Commerce @MiddleEasternChamber

- Home, About, Photos, Videos, Posts, Community

Create a Page



Like, Follow, Share, ...

Send Message

Status Photo/Video Write something on this Page...

Photos



See All

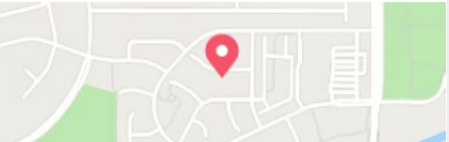
Videos

Government Organization in Santee, California Open Now

Community See All

Invite your friends to like this Page 5,213 people like this 4,958 people follow this

About See All



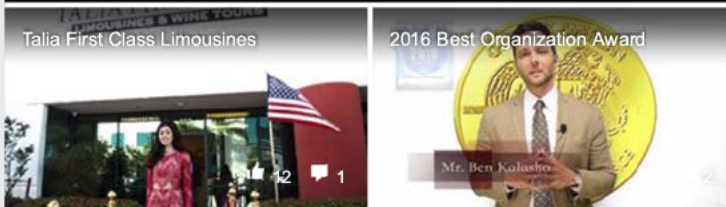
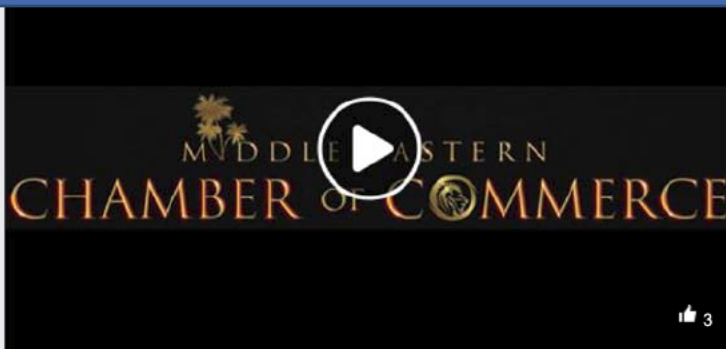
(619) 663-7710 Typically replies within an hour www.MiddleEasternChamber.org Government Organization · Organization Hours 9:00 AM - 5:00 PM Suggest Edits

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Chat (13)

Middle Eastern Chamber of Commerce
@MiddleEasternChamber



See All

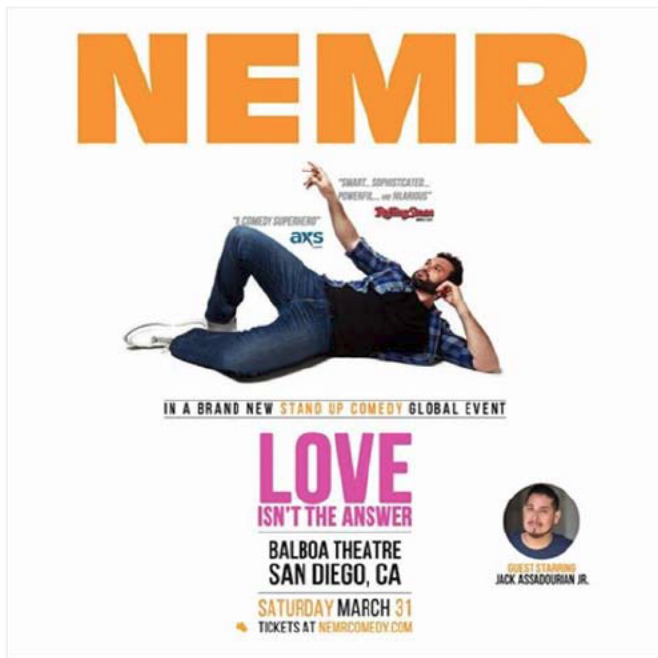
Posts



Middle Eastern Chamber of Commerce

March 29 at 5:23pm · 🌐

Come join us to watch the hilarious NEMR & Jack Assadourian this Saturday in San Diego 😊
You can purchase tickets at nemrcomedy.com
Watch his YouTube Video here https://youtu.be/lcf2_hYmn3A



Like Comment Share

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Write a comment...



Middle Eastern Chamber of Commerce shared Ben Kalasho's post.

March 24 at 9:46am · 🌐

Chat (13)

Middle Eastern Chamber of Commerce
@MiddleEasternChamber



710 Views

Ben Kalasho

March 23 at 6:47pm · Final Cut Pro X · 🌐

AB 2858

While the bill did not pass unfortunately, I am confident that it will pass next year.

The final vote was:

Yes: 2

No: 0

Abstained: 5

👍 Like

💬 Comment

➦ Share

👍 6

Top Comments ▾

3 Shares



Write a comment...



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Posts



Middle Eastern Chamber of Commerce shared Ben Kalasho's post.

December 18, 2017 · 🌐

Chamber President & CEO were in full Elf mode this season helping Seniors. We are proud of our Chamber Leadership.



1,380 Views

Ben Kalasho

December 17, 2017 · Final Cut Pro X · 🌐

*****IF YOU CARE ABOUT SENIORS*****MUST WATCH*****
The All New El Cajon Elves #ElCajonElves

👍 Like

💬 Comment

➦ Share

Chat (13)



MOTION TO DEEM ADMITTED EXA015

Middle Eastern Chamber of Commerce
@MiddleEasternChamber

Write a comment...

Middle Eastern Chamber of Commerce November 28, 2017 ·

Miriam Raftery paid substandard wages to her employee for years. As a Chamber, we strive to protect the working class and ensure that employees are paid a fair and legal wage. [East County Magazine](#) should be ashamed! Where is all the money going????



217 Views

Like Comment Share

Top Comments ▾

Write a comment...

Middle Eastern Chamber of Commerce See Part II
<https://www.youtube.com/watch?v=yPYneWkuSfs>



East County Magazine Founder Paid Employee \$3.44 (Part 2)

YOUTUBE.COM

Like · Reply · 18w

See More ▾

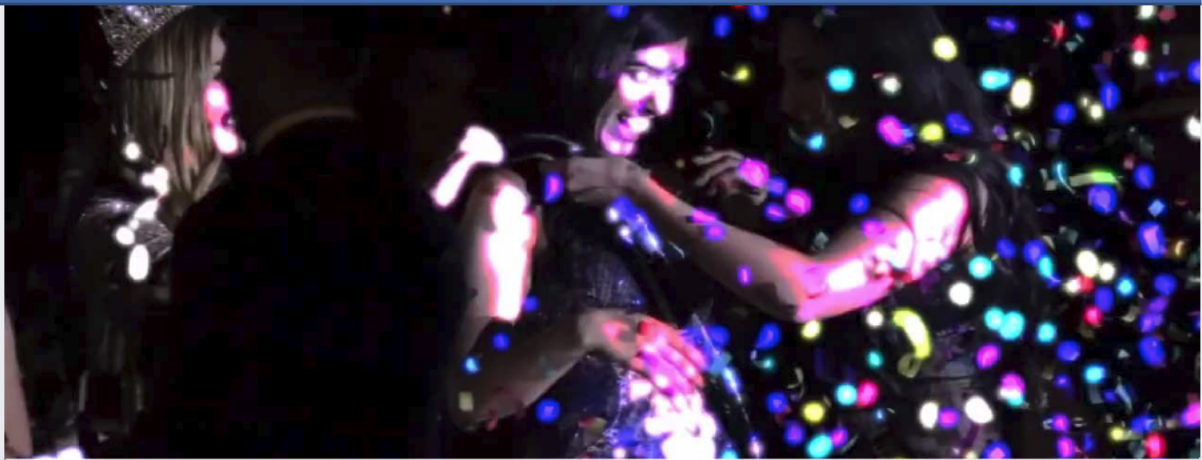
Exhibit B



Miss Middle East USA
 @missmiddleeastusa

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- Community
- Reviews
- Posts

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Photo/Video

Write something on this Page...

Photos



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Videos

Public Figure

Community

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 3,127 people like this
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 www.MissMiddleEast.org
 Public Figure
 Suggest Edits

People Also Like

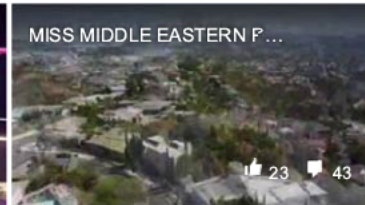
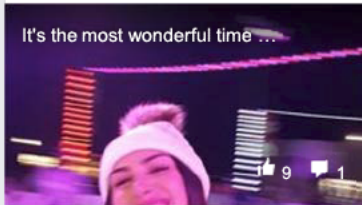
- Middle Eastern Chamb... Government Organization
- The TEDDY BALL Event
- FINE magazine Publisher

Pages liked by this Page

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- NuVision Photography
- Noell

Chat (13)

Miss Middle East USA
@missmiddleeastusa



See All

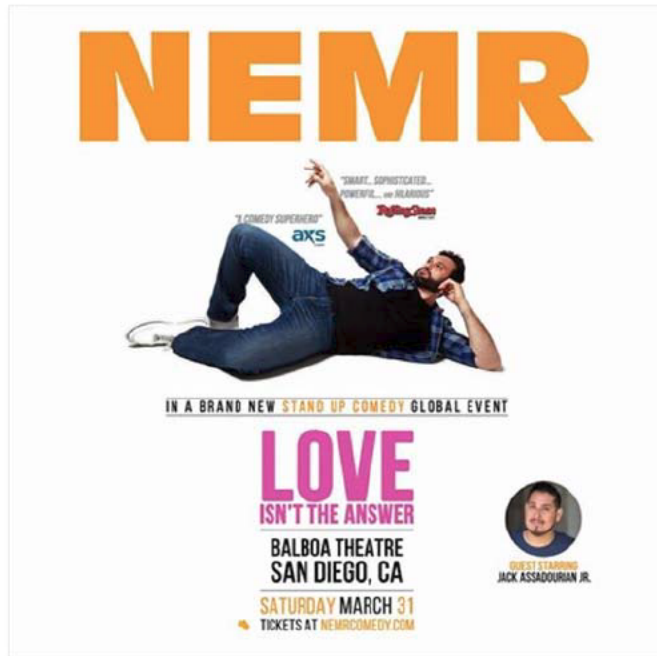
Posts



Miss Middle East USA

March 27 at 9:55pm · 🌐

We can't wait for this! **NEMR** & Jack Assadourian will be performing in San Diego this Saturday March 31st in San Diego 😊 You can purchase tickets at nemrcomedy.com



Like

Comment

Share

1



Write a comment...



Miss Middle East USA shared Ben Kalasho's post.

December 18, 2017 · 🌐

2017 Queen **Parand Biranvand** volunteered with the **El Cajon Elves** to pass out gifts and sing Christmas Carols to seniors! #QueenDuties

Chat (13)



Miss Middle East USA
@missmiddleeastusa



1,380 Views

Ben Kalasho

December 17, 2017 · Final Cut Pro X · 🌐

*****IF YOU CARE ABOUT SENIORS*****MUST WATCH*****
The All New El Cajon Elves #ElCajonElves

👍 Like

💬 Comment

➦ Share

👍 2



Write a comment...



See All

Posts



Miss Middle East USA

November 19, 2017 · 🌐

Pageant Founder **Ben Kalasho** joined Civil Society Organizations in San Diego protesting the proposed amendment to the Iraqi statute law no. 188 which aims legalize girls as young as 9 years old to get married. Mr. Kalasho vowed to do what we can to protect children from these nasty practices.
#NoChildBrides



221 Views

👍 Like

💬 Comment

➦ Share

Chat (13)



MOTION TO DEEM ADMITTED EXA020

Miss Middle East USA
@missmiddleeastusa

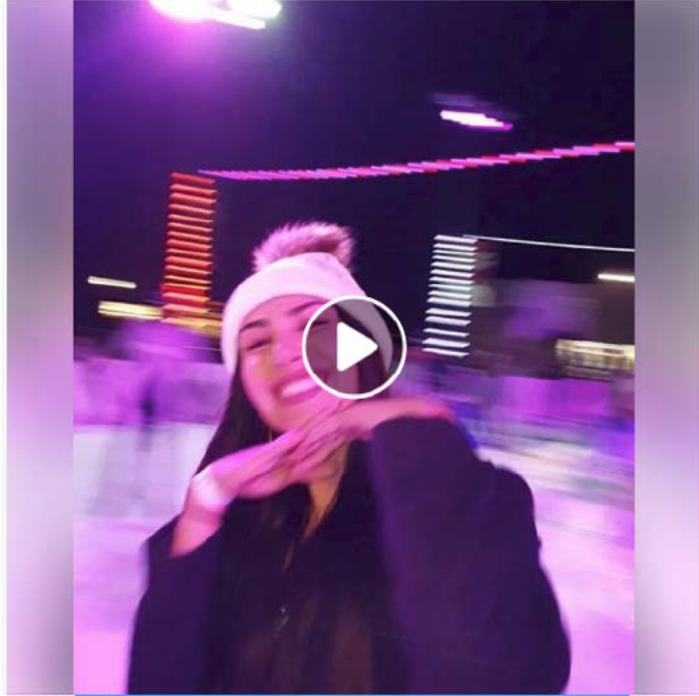
Write a comment... 



Miss Middle East USA

November 13, 2017 · Instagram · 

It's the most wonderful time of the year 🎄 @elonabrande @parand_b
@thenativewolf_90
#missmiddleeastusa



130 Views

 Like

 Comment

 Share

 9

Top Comments ▾

1 Share



Write a comment... 



Alberto Reynaldi Wonderful Beauties 😊

Like · Reply · 20w

See More ▾

Chat (13)



Exhibit C

Melissa Peirson



Melissa Peirson

Add Friend

Message

Timeline

About

Friends 1 Mutual

Photos

More

DO YOU KNOW MELISSA?

To see what she shares with friends, send her a friend request.

Add Friend

1 Mutual Friend

Intro

Fashion Modeling at LA Models

Self-Employed

Studied Business Administration at San Diego State University

Went to Poway High School

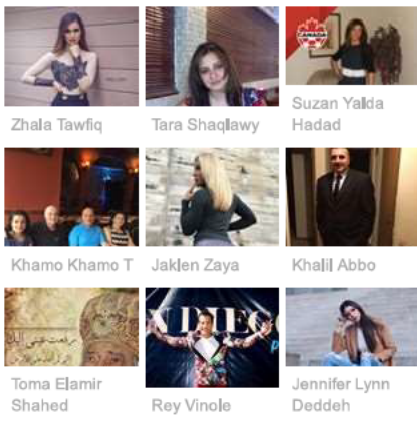
Lives in Poway, California

From San Diego, California

Photos



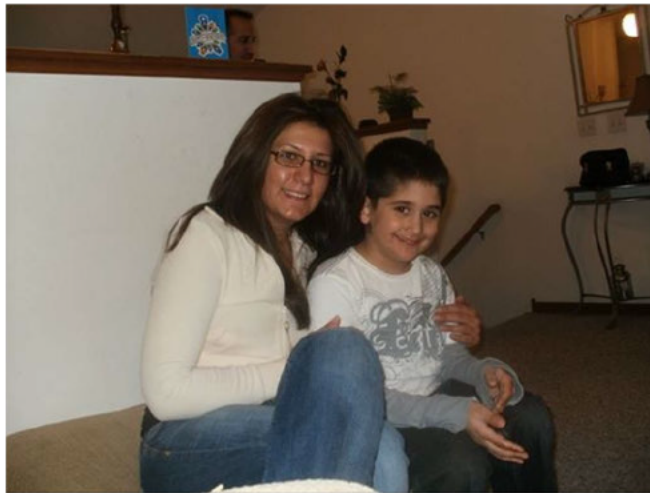
Friends · 186 (1 Mutual)



English (US) · Español · Português (Brasil) · Français (France) · Deutsch

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Suzan Yalka Hadad celebrating Thanksgiving Day with Kristin Polo and 13 others at Canada Alberta. November 24, 2016 ·



Like Comment Share

91

Top Comments

Write a comment...

Blanca E Landaverde Happy thanksgiving 🍂 to u and your family Like · Reply · November 24, 2016 at 4:50am

Linda Dinkha God bless you both hun Like · Reply · November 24, 2016 at 9:02am

Martin Ashur

Like · Reply · November 26, 2016 at 1:39am

Saif A Habeb

منورين الطوين الله يحفظكم

See Translation

Like · Reply · November 24, 2016 at 12:14pm

View 18 more comments

Melissa Peirson October 3, 2015 ·

Love this product!



Share

5



Wisam Koota Beautiful very very nice

[See Translation](#)

October 3, 2015 at 6:34pm

[See More Recent Stories](#) ▾

Exhibit D



THE BEST LAWYERS IN SAN DIEGO

Poll Ends 6/7/15

Results Posted 6/8/15

PUBLIC POLL

Attention, The Chamber is holding a poll for the purpose of determining which attorney in San Diego will score the highest in 3 categories: Honesty, Service & Results. Results will be publicly announced.

 **Chaldean American Chamber of Commerce**


Like This Page · June 4, 2015 ·


Click Link to Submit Form!
<http://www.jotform.us/form/51548591948167>


Like Comment Share

5 [Top Comments](#)


2 shares [2 Comments](#)

 **Robert Forbes** I can tell you who the worst one is, Lina Charry
 Like · Reply · 2 · June 4, 2015 at 9:28pm

 **Melissa Peirson** When Lina Charry wasn't failing her exams, she was sleeping with the guys!
 Like · Reply · June 4, 2015 at 10:22pm · Edited

 Write a comment...

Friend Requests [See All](#)

 **Nash Shiba**
 9 mutual friends
 Confirm Friend

@aptus
 COURT REPORTING

Exhibit: 10
 Witness: J. Deddeh
 Date: 10-4-17

Exhibit E

Ben George



Ben George

Message

- Timeline
- About
- Friends
- Photos
- More

DO YOU KNOW BEN?

If you know Ben, send him a message.

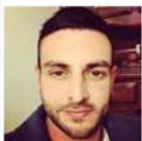
Intro

Driver at UPS

Went to Calvin Coolidge, Washington, DC

Married

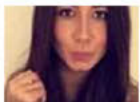
Photos



Friends · 103



Milad Alanis



Muna Mansour



Radni Yusef



Muhammed Jallow



Samira Sasou



Ziad S. Kassab



Aprem Mako



Anelia Genchev



Monica Denegri Keeley

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Ben George updated his profile picture.

January 9, 2016 ·



Share

10



Diane Church Nice Pic !!!
January 9, 2016 at 11:38am



Patricia Jaeger
Translated from Portuguese
Beautiful beautiful
See Original
January 9, 2016 at 11:49am



Maryfrans Balet bon

January 9, 2016 at 1:03pm



Pungpet Thumsiri

EXHIBIT F

BEST MEXICAN FOOD IN EL CAJON CONTEST

Ends 10/17/16

**RATE
US!**



Chaldean American Chamber of
Commerce

Like This Page · October 14, 2016 ·

Click to vote <https://form.jotform.com/51548591948167>

Like Comment Share Attach a Photo or Video



Write a comment...

Exhibit G

BEST MEXICAN FOOD IN EL CAJON CONTEST RESULTS



BEST

- Hacienda Casa Blanca
- Por Favor El Cajon
- El Cotixan Mexican Food
- Pancho's Mexican Restaurant
- El Mariachi Mexican Food
- Colimas Mexican Food
- Albert's Mexican Food
- La Casita's Grill & Seafood
- Rita's Mexican Food
- Rubio's
- Mis Dos Gallos
- Estrada's Mexican Food
- TRES Taqueria Mariscos Cantina

WORST

 **Chaldean American Chamber of Commerce**
 Like This Page · October 18, 2016 ·

The online survey contest our Chamber conducted has revealed interesting results. We would like to thank the hundreds of hungry El Cajonians for participating in this poll. Enjoy!

Like Comment Share


7


[Top Comments](#)

30 shares

25 Comments

 **Ben George** I went to TRES Taqueria Mariscos Cantina and ordered rolled tacos. They were dry and I got really sick and ended up with food poisoning. If you guys want, I can do a video about my experience and you guys can share it. Hollywood Casino Jamul-San Diego better wake up.
 Like · Reply · 1 · October 19, 2016 at 10:17am · Edited

 **Chaldean American Chamber of Commerce**
 We aren't interested in doing a video to bash restaurants. We wish every restaurant prosperity and success in our community. We hope that the ones who polled near the bottom will strive to improve rather than bash this post, the chamber or our polling.
 Like · Reply · 1 · October 19, 2016 at 10:49am · Edited
[View more replies](#)

 **Priscilla Rendon** I think you got this poll wrong dude. First off your missing Karinas Seafood, Las Parrillas and Tres Taqueria is awesome. Why would you put Rubio's. That's not even authentic Mexican food. It's like a Taco Bell. You really need to start helping your community and eat at all these restaurants and see for yourself which ones are the best. I'm Mexican I know what good restaurants



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@ChaldeanAmericanChamber

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- Posts**
- Community

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Chaldean American Chamber of Commerce
October 18, 2016 ·

The online survey contest our Chamber conducted has revealed interesting results. We would like to thank the hundreds of hungry El Cajonians for participating in this poll. Enjoy!

BEST MEXICAN FOOD IN EL CAJON CONTEST RESULTS



BEST

- Hacienda Casa Blanca
- Por Favor El Cajon
- El Cotixan Mexican Food
- Pancho's Mexican Restaurant
- El Mariachi Mexican Food
- Colimas Mexican Food
- Albert's Mexican Food
- La Casita's Grill & Seafood
- Rita's Mexican Food
- Rubio's
- Mis Dos Gallos

Organization in Santee, Calif
Closed Now

Community

- Invite your friends to like this
- 5,444 people like this
- 5,175 people follow this

About

Map showing location near Fletcher Pkwy

(619) 663-7710

Typically replies within a few hours
Send Message

www.ChaldeanAmericanChamber.com

Organization

Opens at 9:00am
Closed Now

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- Sharp Rees-Stealy M
- 7-Eleven (9111 Missi

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CHALDEAN AMERICAN CHAMBER OF COMMERCE

Chaldean American Chamber of Commerce



Chaldean American Chamber of Commerce
@ChaldeanAmericanChamber

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Priscilla Rendon I think you got this poll wrong dude. First on your missing Karinas Seafood, Las Parrillas and Tres Taqueria is awesome. Why would you put Rubio's. That's not even authentic Mexican food. It's like a Taco Bell. You really need to start helping your community and eat at all these restaurants and see for yourself which ones are the best. I'm Mexican I know what good restaurants are authentic. Try again buddy.

Like · Reply · 14 · October 19, 2016 at 10:29am

Chaldean American Chamber of Commerce This poll was conducted online by El Cajon residents. We don't control the outcome. Don't bash the poll because it wasn't the results you wanted. Take care.

Like · Reply · 1 · October 19, 2016 at 10:36am

Priscilla Rendon Really! Add Taco Bell then cause all those are crap except for the last one. I'm not just writing because I know them. The food is really good. That is not a true poll. I know Las Parrillas and Karinas would be #1. I can give a rats ass about your poll. So you take care! Peace out. 🙏

Like · Reply · 2 · October 19, 2016 at 10:40am

Chaldean American Chamber of Commerce Again, we don't add to the list. It was generated based on polling. Don't complain, VOTE.

Like · Reply · October 19, 2016 at 10:50am

Matt Gerold Yea this "poll" is missing a lot of good restaurants; I'm interested to see the actual poll results be published with hard numbers of people polled and how it was conducted. Most accredited companies who do polling will be able to produce these figures. And back to what I originally said, if this is real poll how on earth were more established restaurants simply left off??

Like · Reply · 7 · October 20, 2016 at 12:21am · Edited

Mike McHugh Karina's is awful They do not Sauce even offer Red sauce enchilada's Tortillas are cooked too long sauce taste like out of the can refried beans Gave them a chance since I tried the Original one now gone on Broadway in Chula Vista No difference food stinks

Like · Reply · November 10, 2016 at 1:01pm

Mike McHugh I agree with the comment Why are you bashing the Poll It was a poll asking the best Have you ever seen the Karina's parking lot??? It is always empty I drive by there 3 or 4 times a day It has no customers I'd rather eat at Alberts

Like · Reply · November 10, 2016 at 1:03pm

Mike McHugh Priscilla Rendon Las Parrillas Was the Best when it was by Mole 6 and Mom and Dad ran it, But it went down when they divorced and their Kid took over it and moved it back to the original location Last time we went there tables were dirty a cook was st... See More

Like · Reply · November 10, 2016 at 1:06pm

Mike McHugh BTW Authentic Every part of Mexico has a different style of cooking so what may be authentic to you not the same as deep Mexico or over by Juarez where Ground Beef is favored over Shredded and Carne.

Like · Reply · November 10, 2016 at 1:08pm

Write a reply...

Ben George The funniest thing is that you have this girl commenting. Funny thing is that she slurped it up 2 weeks ago in the parking lot across my Fluxx. LMAO <https://www.facebook.com/profile.php?id=678424822&fref=ts>

Like · Reply · October 19, 2016 at 1:17pm · Edited

Crystal Yousef exposin the chaldo hoes i see

Like · Reply · October 21, 2016 at 11:00pm

Write a reply...

Brandon Watson Nick Owen how did Tres get the lowest?

Like · Reply · 1 · October 20, 2016 at 5:05pm

Nick Owen No idea they just put a new place called Haricandas

Organization in Santee, Calif

Closed Now

Community

Invite your friends to like this

5,444 people like this

5,175 people follow this

About



(619) 663-7710

Typically replies within a few

Send Message

www.ChaldeanAmericanChamber.com

Organization

Opens at 9:00am

Closed Now

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CHALDEAN AMERICAN CHAMBER OF COMMERCE

MOTION TO DEEM ADMITTED EXA034

Chaldean American Chamber of Commerce



Chaldean American Chamber of Commerce

@ChaldeanAmericanChamber

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or our posting.
Like · Reply · 1 · October 19, 2016 at 10:49am · Edited

Edna Garcia Well that place is disgusting so...
Like · Reply · October 19, 2016 at 8:20pm

Write a reply...

Bunyamin Alkan TRES is the best 🍌
Like · Reply · 3 · October 20, 2016 at 1:00am

Ashley Yacoub The fact that rubies is even on here lmao. Tres is bombbbb and should be at the top
Like · Reply · 2 · October 20, 2016 at 12:11am

Robert Forbes I ate at TRES Taqueria Mariscos Cantina and got really really sick. I don't know how Hollywood Casino Jamul-San Diego has them in their food court area. Don't think they will last long.
Like · Reply · 2 · October 19, 2016 at 10:13am

2 Replies · October 19, 2016 at 8:21pm

Natasha Pitina Tres is #1!!!!!! 🍌🍌🍌 BOMB FOOD!!!!
Like · Reply · 9 · October 19, 2016 at 11:29am

Ferris Somo Agreed
Like · Reply · 3 · October 19, 2016 at 6:58pm

Write a reply...

Mindy Williams Trest Taqueria is The best!
Like · Reply · 3 · October 19, 2016 at 6:46pm

Michael Elia Tres hermanos is top 5, all others are garbage. James Elia Ferris Somo Feddwon Somo
Like · Reply · 3 · October 19, 2016 at 6:33pm

Amy Sherbundy Ponchos on Main and El Cotixan on Jhonson st are the two best in El Cajon, right B.b. 😊😊
Like · Reply · 2 · October 19, 2016 at 6:19pm

Steve Abdal You guys haven't been to la posta. Fire
Like · Reply · October 19, 2016 at 5:11pm

Jack Houseberg Tres sucks
Like · Reply · 1 · October 19, 2016 at 4:58pm

Kristina Naoum Donya Khan I love TRES Taqueria Mexican food on Washington in El Cajon the MichiladAs r bomb they have good food
Like · Reply · 1 · October 19, 2016 at 4:16pm

Donya Khan Salem I'm not gonna lie I went there once and I wasn't pleased. There was no salsa at the bar, they ran out of what I wanted. ldk
Like · Reply · 1 · October 19, 2016 at 4:19pm

Write a reply...

Alicia Palozzi Number one in my book! 🍌🍌
Like · Reply · October 19, 2016 at 3:44pm

Chance Wilkomm Tres is the best
Like · Reply · 2 · October 19, 2016 at 3:37pm

Melissa Peirson I personally hate Rubios (there street tacos are ok) but I noticed that a lot of people like Rubios very much. I've tried Hacienda Casa Blanca and they are one of my favorites. I need to try a few others. I haven't tried Tres Taqueria though because I've heard of some pretty bad experiences from people 😊
Like · Reply · 2 · October 19, 2016 at 10:39am · Edited

2 Replies · October 19, 2016 at 12:29pm

Carlos Reyna I've gone to almost so the places on the list. TRES is my top

Organization in Santee, Calif
Closed Now

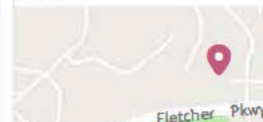
Community

👤 Invite your friends to like this

👍 5,444 people like this

👤 5,175 people follow this

About



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🗨 Typically replies within a few
Send Message

🌐 www.ChaldeanAmericanCha

🏢 Organization

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CHALDEAN AMERICAN CHAMBER OF COMMERCE

MOTION TO DEEM ADMITTED EXA035

Exhibit H




**THE BEST
LAWYERS
IN
SAN DIEGO**

**Poll Ends
6/7/15**

**Results Posted
6/8/15**

PUBLIC POLL

Attention, The Chamber is holding a poll for the purpose of determining which attorney in San Diego will score the highest in 3 categories: **Honesty, Service & Results. Results will be publicly announced.**



Chaldean American Chamber of Commerce


Like This Page · June 4, 2015 ·

Click Link to Submit Form!
<http://www.jotform.us/form/51548591948167>

Like Comment Share

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3 shares [2 Comments](#)

 **Robert Forbes** I can tell you who the worst one is, Lina Charry
[Like](#) · [Reply](#) · 2 · June 4, 2015 at 9:28pm

 **Melissa Peirson** When Lina Charry wasn't failing her exams, she was sleeping with the guys!
[Like](#) · [Reply](#) · June 4, 2015 at 10:22pm · Edited

 Write a comment...

Buy and Sell Groups Near You



 **Everything Baby San Diego**
1 friend · 3,657 members [Join](#)

Exhibit I

Search bar

Self Home

Create Page

Edit History

Chaldean American Chamber of Commerce June 8 at 7:57pm

The results are in, YOU ALL voted for San Diego's highest rated attorneys

Chaldean American Chamber of Commerce June 8 at 8:47pm

The results are in, YOU ALL voted for San Diego's highest rated attorneys We have over 330 people who submitted their votes!

Chaldean American Chamber of Commerce June 8 at 8:48pm

The results are in, YOU ALL voted for San Diego's highest rated attorneys We had over 330 people who submitted their votes!



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6 Months For Less vantage.com Save more, talk more, with unlimited calls to 60 countries. Offer ends soon-get Vantage now

umber of

This is visible to anyone who can see this post.

Close

or San Diego's over 330 people

on Puerto Los Cabos - sive, \$207. This all- anfront resort offers...

who submitted their votes!

Like · Comment · Share

4 people like this.

2 shares



Write a comment...

Sponsored

Create Ad

RESULTS

Good

- Michael Brown, Thomas Palecek, Tara Yelman, David J. Noonan, Jylan Megahed, James R. Dawe, Seltzer Caplan, McMahon Vitek, Sara Neumann, David Ruyle, Samuel Spital, David Weil, William Hannosh, William Daley, John Rodriguez, Michael Pines, Keith Stone, Gerald Linkon, Edward Wong, Jarod Bona, Alan Brubaker, Thomas C. Frost, Patricia P. Hollenbeck, Daniel Kaplan, Michael Kirby, Claudette G. Wilson, Robert M. Juskie, Wingert Grebing, Charles A. Bird, William E. Beamer, Robert J. Bell, Justin Chikat...

Chaldean American Chamber of Commerce in Timeline Photos



RESULTS

Good

Average

- Samuel Spina
- David Weil
- William Hannosh
- William Daley
- John Rodriguez
- Michael Pines
- Keith Stone
- Gerald Linkon
- Edward Wong
- Jarod Bona
- Alan Brubaker
- Thomas C. Frost
- Patricia P. Hollenbeck
- Daniel Kaplan
- Michael Kirby
- Claudette G. Wilson
- Robert M. Juskie
- Wingert Grebing
- Charles A. Bird
- William E. Beamer
- Robert J. Bell
- Cynthia Chihak
- John E. Gartman
- Vanessa Pena



♥ 41 likes

chaldean_chamber The results are in, YOU ALL voted for your choice of highest rated attorneys in San Diego :)

view all 5 comments

sam_yousif1977 Who was the worst rated attorney?

chaldean_chamber @sam_yousif1977 >> Lina Charry was worst. She works at Law Office of Jennifer Hasso. Her Lic# 281508.

chaldean_chamber Lina Charry scored the lowest in all categories. Thanks to the hundreds of people who voted :)

aptus
COURT REPORTING

Exhibit: 8
Witness: J. Deddeh
Date: 10-4-17



vanillla_mint



3h



RE

PATRICIA P. HOLLENBECK
Daniel Kaplan
Michael Kirby
Claudette G. Wilson
Robert M. Juskie
Wingert Grebing
Charles A. Bird
William E. Beamer
Robert J. Bell
Cynthia Chihak
John E. Gartman
Vanessa Pena

Average



Chaldean American Chamber of Commerce

The results are in, YOU ALL voted for San Diego's highest rated attorneys 😊 We had over 330 people who submitted their votes!

Chaldean American Chamber of Commerce's Photos in Timeline Photos · 3 hours ago ·

[View Full Size](#) · [Send as Message](#) · [Report Photo](#)

Like

Comment

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2 people like this.

Write a comment...



Robert Singer

Do you guys know who scored the absolute worst?

Like · 1 · Reply · More · 3 hours ago



Chaldean American Chamber of Commerce

Yes, Lina Charry <http://members.calbar.ca.gov/fal/Member/Detail/281508>

State Bar of CA :: Lina Charry

The State Bar of California maintains a database of ...

members.calbar.ca.gov

Exhibit J

Submission Date	IP	Name of restaurant	Taste	Consistency	Freshness
10-17-2016 18:53:44	68.8.123.178	Rubio's	Very Satisfied	Very	Very
10-19-2016 15:09:40	72.199.201.148	TRES	Very Satisfied	Very	Very
10-19-2016 18:42:33	70.181.201.244	Tres	Very Satisfied	Very	Very
10-20-2016 00:51:34	108.255.201.19	tres taqueria mariscos cantina	Very Satisfied	Very	Very



 Exhibit: 14

 Witness: J. Decker

 Date: 10-4-19

Exhibit K

Submission Date	IP	Name of restaurant	Taste	Consistency	Freshness
10-20-2016 00:51:34	108.255.201.19	tres taqueria mariscos cantina	Very Satisfied	Very	Very
10-19-2016 18:42:33	70.181.201.244	Tres	Very Satisfied	Very	Very
10-19-2016 15:09:40	72.199.201.148	TRES	Very Satisfied	Very	Very
10-17-2016 18:53:44	68.8.123.178	Rubio's	Very Satisfied	Very	Very
07-03-2015 17:44:19	70.211.8.207	Juylanmegahead	Very Satisfied	Very Honest	Great Service
06-15-2015 00:13:28	174.254.64.35	Abdelali Krani	Very Satisfied	Very Honest	Great Service
06-10-2015 14:47:02	107.184.255.44	megahed esq	Very Satisfied	Very Honest	Great Service
06-09-2015 19:30:41	71.238.29.168		Very Satisfied	Very Honest	Great Service
06-09-2015 16:24:31	148.168.216.22	Megahed, ESQ.	Very Satisfied	Very Honest	Great Service
06-09-2015 00:39:39	68.111.206.186		Very Satisfied	Very Honest	Great Service
06-08-2015 22:09:33	68.3.249.38	Megahed Esq	Very Satisfied	Very Honest	Great Service
06-08-2015 11:28:47	147.1.234.163	MEGAHED, ESQ	Very Satisfied	Very Honest	Great Service
06-08-2015 11:26:31	70.211.10.23	magahed, Esq.	Very Satisfied	Very Honest	Great Service
06-08-2015 11:25:44	104.244.241.149		Very Satisfied	Very Honest	Great Service
06-08-2015 11:18:47	24.115.63.41	MEGAHED, ESQ	Very Satisfied	Very Honest	Great Service
06-08-2015 08:00:23	107.77.70.84	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-08-2015 03:54:34	197.135.127.218	Megahed, esq	Very Satisfied	Very Honest	Great Service
06-08-2015 03:01:39	107.132.35.67	Megahed, ESQ.	Very Satisfied	Very Honest	Great Service
06-08-2015 00:59:11	166.137.8.63	MEGAHED, ESQ	Very Satisfied	Very Honest	Great Service
06-08-2015 00:41:38	98.248.220.51	Megahed Esq	Very Satisfied	Very Honest	Great Service
06-08-2015 00:22:14	66.27.87.159	megahed, Esq	Very Satisfied	Very Honest	Great Service
06-07-2015 23:52:12	172.56.39.139	Megahed ESQ	Very Satisfied	Very Honest	Great Service
06-07-2015 23:50:20	96.234.134.70	Megahed, esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:43:48	174.65.164.96	Megahed, esq	Very Satisfied	Very Honest	Great Service
06-07-2015 23:39:29	101.99.150.128	Megahead, ESQ	Very Satisfied	Very Honest	Great Service
06-07-2015 23:38:28	76.176.52.93	MEGAHED, ESQ.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:33:32	66.27.109.254	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:22:32	66.75.20.247	Megahed low office	Very Satisfied	Very Honest	Great Service
06-07-2015 23:21:25	66.75.20.247	Mogahed low office	Very Satisfied	Very Honest	Great Service
06-07-2015 23:17:47	70.176.219.184	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:13:34	66.27.109.254	Megahed, ESQ.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:04:40	74.101.198.120	Jylan Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:04:10	124.149.58.144	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:03:28	137.110.195.54	MEGAHED, ESQ.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:03:24	98.160.199.210	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:01:21	99.74.217.205	Megahed esq	Very Satisfied	Very Honest	Great Service
06-07-2015 23:01:20	99.13.58.233	megahed, ESQ	Very Satisfied	Very Honest	Great Service
06-07-2015 23:00:59	137.110.195.53	MEGAHED, ESQ.	Very Satisfied	Very Honest	Great Service
06-07-2015 23:00:34	172.56.38.212	megahead esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 22:59:32	66.27.109.254	MEGAHED, ESQ.	Very Satisfied	Very Honest	Great Service
06-07-2015 22:57:25	97.117.143.216	Megahed esg	Very Satisfied	Very Honest	Great Service
06-07-2015 22:49:42	66.27.109.254	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-07-2015 01:04:32	166.170.5.84		Very Satisfied	Very Honest	Great Service
06-06-2015 20:38:03	184.98.73.169	Jylan Megahed	Very Satisfied	Very Honest	Great Service
06-06-2015 19:52:02	76.183.122.46	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-06-2015 19:36:14	99.50.200.114	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-06-2015 19:28:43	70.209.205.163	Jylan Megahed esq	Very Satisfied	Very Honest	Great Service
06-06-2015 14:12:49	70.209.195.162	Megahed	Very Satisfied	Very Honest	Great Service
06-06-2015 08:23:06	66.27.109.254	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-06-2015 08:23:01	66.27.109.254	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-06-2015 01:07:55	172.13.98.137	Jylan Megahed	Very Satisfied	Very Honest	Great Service
06-06-2015 00:10:37	68.101.179.60	Megahed esq	Very Satisfied	Very Honest	Great Service
06-05-2015 23:42:55	99.59.117.174	Megahed esquire	Very Satisfied	Very Honest	Great Service
06-05-2015 23:40:55	172.56.17.73	megahed esq	Very Satisfied	Very Honest	Great Service
06-05-2015 23:36:12	166.137.246.57		Very Satisfied	Very Honest	Great Service
06-05-2015 22:37:16	74.100.70.19	Megahed esq --->firm	Very Satisfied	Very Honest	Great Service
06-05-2015 22:26:24	23.113.28.39		Very Satisfied	Very Honest	Great Service
06-05-2015 22:26:12	23.113.28.39		Very Satisfied	Very Honest	Great Service
06-05-2015 22:16:53	166.137.246.46	Megahed, ESQ.	Very Satisfied	Very Honest	Great Service
06-05-2015 22:01:35	75.80.48.185	Megahed, Esq	Very Satisfied	Very Honest	Great Service
06-05-2015 21:46:04	76.88.20.111	Megahed, ESQ.	Very Satisfied	Very Honest	Great Service
06-05-2015 21:42:43	172.89.240.171	Law offices of Jylan Megahed	Very Satisfied	Very Honest	Great Service

06-05-2015 21:31:55	162.201.151.15		Very Satisfied	Very Honest	Great Service
06-05-2015 21:06:27	50.126.143.58	Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-05-2015 20:27:49	72.197.211.33	Megahed Esq.	Very Satisfied	Very Honest	Great Service
06-05-2015 19:28:20	166.137.246.26	Megahed Esq	Very Satisfied	Very Honest	Great Service
06-05-2015 19:08:00	70.209.76.62	Megahed Esq	Very Satisfied	Very Honest	Great Service
06-05-2015 19:01:41	70.209.205.40	magahed, Esq.	Very Satisfied	Very Honest	Great Service
06-05-2015 18:47:46	70.209.76.62	Megahed sq	Very Satisfied	Very Honest	Great Service
06-05-2015 18:37:40	70.209.76.62	Family lawattorne	Very Satisfied	Very Honest	Great Service
06-05-2015 18:19:46	174.17.36.169	Family lawattorne	Very Satisfied	Very Honest	Great Service
06-05-2015 18:16:08	70.209.204.151		Very Satisfied	Very Honest	Great Service
06-05-2015 18:14:38	66.87.65.15		Very Satisfied	Very Honest	Great Service
06-05-2015 17:47:44	76.79.136.118	The Law Offices of Dale Dixon	Very Satisfied	Very Honest	Great Service
06-05-2015 17:44:22	166.170.14.26	Megahed Esq	Very Satisfied	Very Honest	Great Service
06-05-2015 17:42:11	70.168.62.52		Very Satisfied	Very Honest	Great Service
06-05-2015 17:18:45	70.168.62.52		Very Satisfied	Very Honest	Great Service
06-05-2015 17:17:18	174.65.52.86	Jylan Megahed, Esq.	Very Satisfied	Very Honest	Great Service
06-05-2015 17:17:14	66.87.71.104	ESQ	Very Satisfied	Very Honest	Great Service
06-05-2015 17:15:59	24.25.212.238		Very Satisfied	Very Honest	Great Service
06-05-2015 17:15:03	172.56.16.110	Jylan Megahed	Very Satisfied	Very Honest	Great Service
06-05-2015 17:14:09	72.220.80.70		Very Satisfied	Very Honest	Great Service
06-05-2015 17:12:01	208.54.39.228	Megahed, Esq	Very Satisfied	Very Honest	Great Service
06-05-2015 17:05:53	70.176.220.28	ESQ	Very Satisfied	Very Honest	Great Service
06-05-2015 17:04:49	70.209.67.19	Megahed, ESQ	Very Satisfied	Very Honest	Great Service
06-05-2015 17:04:30	75.80.173.147		Very Satisfied	Very Honest	Great Service
06-05-2015 17:00:46	68.8.238.252	Megahed law	Very Satisfied	Very Honest	Great Service
06-05-2015 16:43:32	12.188.84.66		Very Satisfied	Very Honest	Great Service
06-05-2015 16:43:05	12.188.84.66		Very Satisfied	Very Honest	Great Service
06-05-2015 16:42:40	12.188.84.66	Megahed, esq	Very Satisfied	Very Honest	Great Service
06-05-2015 16:42:34	12.188.84.66	Megahed, esq	Very Satisfied	Very Honest	Great Service
06-04-2015 23:18:38	70.179.54.69	Single practice	Very Satisfied	Very Honest	Great Service

Exhibit L

zhala_tawfiq_fanpage



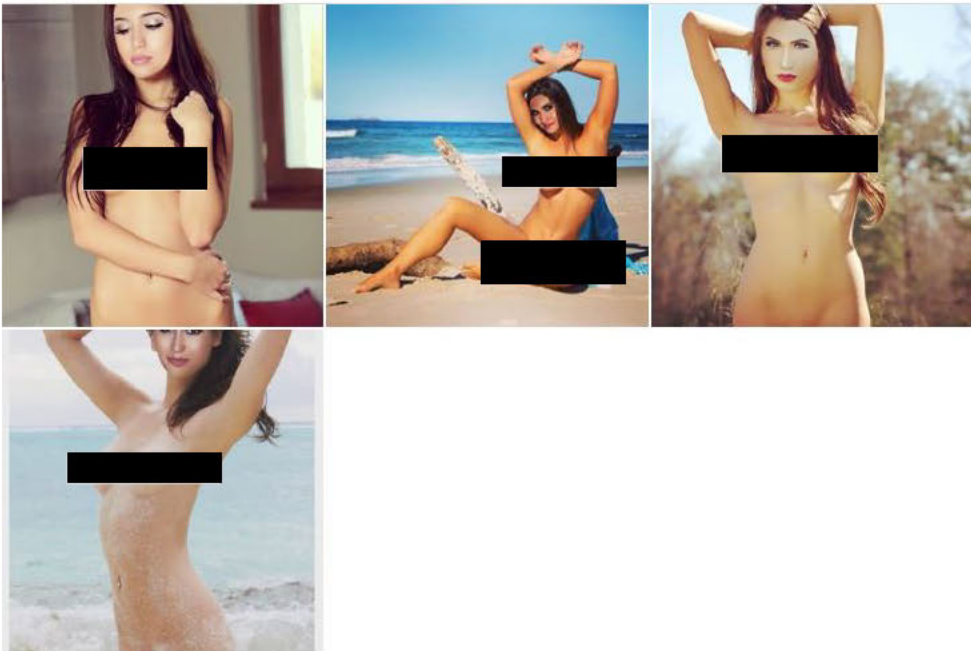
4 posts

0 followers

0 following

Follow

Leaked images of Miss Middle East Beauty Queen fanpage



4.

Following

You

NEW



zhala_tawfiq_fanpage mentioned you in a comment: Another photo of the Kurdish beauty queen!



Bunny ¹⁰⁰ 🥰 @zhalatawfiq_ Miss Middle East #bigfan #sandiego #beauty#queen #zhalatawfiq #missmiddleeast #middleeast #art #model #beach #beautiful #body #kurdish #kurdistan #kurdishgirl 21s

SEEN



zhala_tawfiq_fanpage mentioned you in a comment: @zhalatawfiq_ the gorgeous Kurdish beauty queen posing at the beach. Miss Middle East from America #sandiego #beauty#queen #zhalatawfiq #missmiddleeast #middleeast #art #model #beach #beautiful #body #kurdish #kurdistan #kurdishgirl 2m



ahmad_sport_99 started following you. 11m

Follow



qubayi started following you. 40m

Follow



5.

Exhibit B

1 JIMMIE DAVIS PARKER, ESQ. (SBN: 252023)
2 **LAW OFFICE OF JIMMIE DAVIS PARKER, APC**
3 4241 ARDEN WAY
4 SAN DIEGO, CALIFORNIA 92103
5 619-887-3300
6 JDParker@gmail.com

7 Attorney for Plaintiffs Zhala Tawfiq,
8 Paris Kargar, 3 Brothers Taco Shop, Inc. dba Tres Taqueria

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN DIEGO**

12 ZHALA TAWFIQ, et al.,

13 Plaintiffs,

14 v.

15 MISS MIDDLE EAST BEAUTY PAGEANT
16 USA, INC, et al.,

17 Defendants.

) Case No.: 37-2017-00019692-CU-FR-CTL

)

) [IMAGED FILE]

)

) [Assigned to Hon. Timothy Taylor for
all purposes]

)

) **PROOF OF SERVICE - RFA (TWO);**
) **FROG (THREE) FROM PLAINTIFFS TO**
) **KALASHO DEFENDANTS**

)

) **Complaint Filed: May 31, 2017**
) **Trial Date: August 10, 2018**

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1 **PROOF OF SERVICE**

2 I, JIMMIE D. PARKER, declare that I am employed in the City and County of San Diego,
3 California. I am over the age of eighteen years. My business address is 4241 Arden Way San Diego,
4 California 92103. I am not a party to the above-entitled action.

5 On the 4th day of April 2018, I served true and correct copies of the foregoing:

- 6 • PLAINTIFFS' REQUEST FOR ADMISSIONS SET TWO TO KALASHO DEFENDANTS
- 7 • PLAINTIFFS' REQUEST FOR RESPONSES TO FORM INTERROGATORY 17.1 (THREE)
- 8 • DECLARATION OF JIMMIE DAVIS PARKER IN SUPPORT OF PLAINTIFFS' REQUEST
9 FOR ADMISSION SET (TWO)

10 ~~by placing the same in an envelope, postage pre paid, and by placing the same in the United States
11 Mail with a FedEx Parcel Service provider at San Diego, California, addressed as follows:~~

12 By electronic service and US MAIL:

13 Stephen Liosi, Esq. (Counsel for Defendants "KALASHO")
14 PO Box 396
Pasadena, California 91102
attorneyliosi@gmail.com

15 Jennifer Hasso, Esq. (Counsel for Plaintiff Lina Charry)
16 Law Office of Jennifer Hasso
2765 Second Ave.
17 San Diego, California 92103
jhasso@gmail.com
18 (via email only)

19 Counsel for Malouf Defendants:
20 Steven Cooper, Esq.
21515 Hawthorne Blvd Ste 980
21 Torrance, CA 90503
sco2059339@aol.com
22 (via email only)

23 COPY TO PUTATIVE COUNSEL FOR KALASHOS:

24 James Finigan, Esq.
25 Law Offices of James P. Finigan
6437 Caminito Blythefield Suite C
26 La Jolla, California 92037
jpf@finiganlaw.com

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed this 4th day of April 2018, at San Diego, California.

3
4
5 **Law Office of Jimmie Davis Parker, APC**


6
7
8 By:  _____
9 Jimmie Davis Parker, Esq.
10 Attorney for Plaintiffs Zhala Tawfiq, Paris
11 Kargar, 3 Brothers Taco Shop, Inc. dba Tres
12 Taqueria
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Exhibit C

1 JIMMIE DAVIS PARKER, ESQ. (SBN: 252023)
2 **LAW OFFICE OF JIMMIE DAVIS PARKER, APC**
3 4241 ARDEN WAY
4 SAN DIEGO, CALIFORNIA 92103
5 619-887-3300
6 JDParker@gmail.com

7 Attorney for Plaintiffs Zhala Tawfiq,
8 Paris Kargar, and 3 Brothers Taco Shop, Inc. dba Tres Taqueria

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN DIEGO**

12 ZHALA TAWFIQ, *et al.*,) Case No.: 37-2017-00019692-CU-FR-CTL
13)
14 Plaintiffs,) [IMAGED FILE]
15 v.) [Assigned to Hon. Timothy Taylor for all purposes]

16 MISS MIDDLE EAST BEAUTY PAGEANT)
17 USA, INC., a California non-profit corporation, *et*)
18 *al.*,) DECLARATION OF JIMMIE DAVIS
19 Defendants.) PARKER, ESQ. IN SUPPORT OF
20) PLAINTIFFS' REQUEST FOR ADMISSION
21) SET (TWO)

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Complaint Filed: May 31, 2017
Trial Date: August 10, 2018
Date: N/A
Time: N/A
Location: C-72

1 I, JIMMIE DAVIS PARKER, declare as follows:

2 1. I am one of the counsel of record for several of the Plaintiffs in this action.

3 2. I am propounding to Defendants Jessica Kalasho (Deddeh), Bessmon Kalasho,
4 Miss Middle East Beauty Pageant USA, Inc., and Middle Eastern Chamber of Commerce
5 fka San Diego East County Chaldean American Chamber of Commerce the attached set of
6 requests for admission.

7 3. This set of requests for admission will cause the total number of requests
8 propounded to the parties to whom they are directed to exceed the number of requests
9 permitted by Section 2033.030 of the Code of Civil Procedure.

10 4. I have previously propounded a total of ten requests for admission to this party.

11 5. This set of requests for admission contains a total of 92 requests.

12 6. I am familiar with the issues and the previous discovery conducted by all of the
13 parties in this case.

14 7. I have personally examined each of the requests in this set of requests for
15 admission.

16 8. This number of requests for admission is warranted under Section 2033.040 of the
17 Code of Civil Procedure because of number of plaintiffs, defendants and the complexity
18 and quantity of issues in the instant lawsuit warrant each one of these requests for
19 admission. Additionally, truthful responses to this set of RFA will greatly eliminate the
20 number of triable issues before the Court.

21 9. None of the requests in this set of requests is being propounded for any improper
22 purpose, such as to harass the party, or the attorney for the party, to whom it is directed,
23 or to cause unnecessary delay or needless increase in the cost of litigation.

24

25 [endorsement on next page]

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28 DECLARATION OF JIMMIE DAVIS PARKER, ESQ. IN SUPPORT IN SUPPORT OF PLAINTIFFS' REQUEST
FOR ADMISSION SET (TWO)

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I declare under penalty of perjury under the laws of California that the foregoing is true and correct, and that this declaration was executed on April 4, 2018.

LAW OFFICE OF JIMMIE DAVIS PARKER, APC

By:  _____
Jimmie Davis Parker, Esq.
Attorneys for Plaintiffs Zhala Tawfiq, Three Brothers
Taco Shop, Inc. and Paris Kargar