

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

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

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

ZHALA TAWFIQ, *et al.*,

Plaintiffs,

V.

MISS MIDDLE EAST BEAUTY PAGEANT
USA, INC., a California non-profit corporation, *et al.*,

Defendants.

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

Cross- Complainants,

V.

ZHALA TAWFIQ, et al.,

Cross-Defendants.

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

[IMAGED FILE]

[Assigned to Hon. Timothy Taylor for all purposes]

DECLARATION OF JIMMIE DAVIS
PARKER, ESQ. IN SUPPORT OF
PLAINTIFFS THREE BROTHERS TACO
SHOP, INC., PARIS KARGAR, ZHALA
TAWFIQ's MOTION TO STRIKE
PURSUANT TO CODE OF CIVIL
PROCEDURE SECTION 425.16

Complaint Filed: May 31, 2017

Trial Date: None Set

Date: December 22, 2017

Time: 1:30 PM

Location: C-72

**DECLARATION OF JIMMIE DAVIS PARKER IN SUPPORT OF PLAINTIFFS/CROSS-DEFENDANTS MOTION
TO STRIKE PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 425.16**

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
4 above-entitled action. I have personal knowledge of the matters stated herein and, if
5 called upon, I could and would competently testify thereto.

6 2. I met and conferred with Counsel for Defendants/Cross-Complainants,
7 Steve Liosi, Esq. pursuant to Code of Civil Procedure section 430.41 upon review of the
8 Cross-Complaint where I noted the various deficiencies in the cross-action against my
9 clients. I informed Mr. Liosi that the action as filed is improper on its face and subject to
10 sanction. I further noted that under the weight of the evidence that has been obtained and
11 shared, his action is abusive and unethical. He instructed me that he would remedy the
12 deficiencies by filing a First Amended Cross-Complaint ("FACC"). However, the FACC
13 did not remedy the noted deficiencies. Attached hereto as Exhibit A is a true and correct
14 copy of a correspondence memorizing the meet and confer effort.

15 3. Attached hereto as Exhibit B is a true and correct copy of the solicitation to
16 vote for Mexican Restaurants in El Cajon and link to Jotform to vote published on October
17 17, 2016 by Defendant MIDDLE EASTERN CHAMBER OF COMMERCE fka SAN DIEGO
18 EAST COUNTY CHALDEAN AMERICAN CHAMBER OF COMMERCE 's ("Chamber")
19 Facebook page ran by the KALASHOS.

20 4. Attached hereto as Exhibit C is a true and correct copy of the graphic
21 published by the Chamber on their Facebook page on October 18, 2016 representing the
22 results of the Mexican Restaurant Poll, that the poll received "hundreds" of votes and that
23 Tres was voted the worst Mexican Restaurant in El Cajon.

24 5. Plaintiffs subpoenaed the company that hosted the Chamber's "Mexican
25 Food Poll", Jotform, Inc. and it provided the raw data for the vote. Attached hereto as
26 Exhibit D is Plaintiffs' Subpoena to JotForm and their response indicating that the
27 "Mexican Food Poll" only received one response before the results of the poll were
28

1 published by the Chamber.

2 6. Mr. Hallack's interaction with the KALASHO campaign of October 12, 2016
3 whereby a COUNCILMAN KALASHO campaign worker requested to post signs at the
4 restaurant, Mr. Hallack's refusal, and his suspicions that the CHAMBER's subsequent
5 "poll" was merely a pretense to defame the restaurant in retaliation for not posting
6 COUNCILMAN KALASHOS' campaign signs was contemporaneously memorialized by
7 Mr. Hallack via his Facebook post of October 19, 2016, attached hereto as Exhibit E.

8 7. Plaintiffs sought the login history and IP addresses of various alias Facebook
9 profiles that Plaintiffs suspected to be under the control of the KALASHOS via subpoena
10 attached hereto as Exhibit F. In response to the subpoena, Facebook provided the IP
11 addresses of various logins to the Facebook Profiles of "Robert Forbes," "Ben George," and
12 "Melissa Pierson," as well as, the IP addresses of the known KALASHO Facebook profiles
13 including their own personal pages, that of the Chamber and of the Pageant. These
14 responses are provided here in their pertinent parts as Exhibit G. The IP addresses were
15 then targeted by Plaintiffs' subpoena to Cox Communications to identify the account
16 holder and physical address of the various logins to the alias Facebook profiles. The Cox
17 Communications subpoena and response thereto is attached hereto as Exhibit H. The
18 information compiled establishes that the Facebook profiles of "George," "Forbes," and
19 "Pierson" were accessed at least 194 times from the Kalasho's El Cajon home and is also
20 the location of where these three profiles were also deleted after the filing of the litigation.
21 Attached hereto as Exhibit I is a true and correct compilation of the data provided to
22 Plaintiffs via subpoena.

23 8. Attached hereto as Exhibit J is a true and correct copy of the Facebook
24 posting of "Robert Forbes" on October 19, 2017 which states: "I ate at TRES and got really
25 really sick. I don't know how Hollywood Casino Jamul-San Diego has them in their food
26 court area. Don't think they will last long"

27 9. Attached hereto as Exhibit K is a true and correct copy of the Facebook
28

1 posting of "Ben George" on the CHAMBER's Facebook page on October 19, 2016: "I went
2 to TRES and ordered rolled tacos. They were dry and I got really sick and ended up with
3 food poisoning. If you guys want, I can do a video about my experience and you guys can
4 share it. Hollywood Casino Jamul-San Diego better wake up." The CHAMBER
5 responded to the post: "We aren't interested in doing a video to bash restaurants. We wish
6 every restaurant prosperity and success in our community. We hope that the ones who
7 polled near the bottom will strive to improve rather than bash this post, the chamber or
8 our polling."

9 10. The \$2,000 cash prize promised to the winner of the 2016 Miss Middle East
10 USA Beauty Pageant was donated by a local attorney. This is evidenced by a sponsorship
11 announcement, deposition testimony of Jessica Kalasho and name on the oversized check
12 given to Plaintiff Tawfiq at the contest when she was announced the winner. See Exhibit
13 P at 114:5-25.

14 11. Attached hereto as Exhibit L is a true and correct copy of the putative
15 contract at issue between the PAGEANT and ZHALA TAWFIQ authenticated by the
16 deposition Testimony of Jessica Kalasho (Deddeh). See Exhibit P at 115:19-116:3. The
17 contract was executed three days after she won the Pageant and was already entitled to
18 her \$2000 cash prize.

19 12. Attached hereto as Exhibit M is a slightly redacted, true and correct copy of
20 the Instagram account "Zhala_Tawfiq_Fanpage" on April 7, 2017 and the four falsified
21 nude images of Plaintiff Tawfiq.

22 13. In response to subpoena, Instagram identified the IP address of the culprit
23 who published the falsified nudes of Ms. Tawfiq as 47.41.199.154. Attached hereto as
24 Exhibit N is a true and correct copy of the Instagram responsive records identifying the IP
25 address. Plaintiffs obtained an Order from this Court on October 3, 2017 directing Charter
26 Communications to produce information responsive to an outstanding subpoena
27 identifying the account holder of the targeted IP address. Charter Communications
28

1 identified the subscriber as Elie Malouf of 12432 Pine Creek Road, Cerritos, California
2 90730. Attached hereto as Exhibit O is a true and correct copy of Charter Communications
3 responsive records, identifying the offending IP address and subscriber as Elie Malouf.

4 14. Elie Malouf is the father of Stephanie Malouf who also resides at the same
5 residence. Stephanie Malouf is a close friend of the KALASHOS and former winner of
6 their beauty pageant. JESSICA KALASHO testified at her deposition that she was with
7 Ms. Malouf in the Cerritos area the weekend the nude images were published from Ms.
8 Malouf's Cerritos home. Attached hereto as Exhibit P is a true and correct copy of an
9 excerpt of the Deposition Transcript of Ms. KALASHO (Deddeh). See Exhibit P at 119:5-
10 24.

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct. Executed on Nov. 5, 2017, at San Diego, California.

14
15 Date: November 5, 2017

LAW OFFICES OF JIMMIE DAVIS PARKER, APC

16
17
18 By: 

19 Jimmie Davis Parker, Esq.
20 Attorneys for Plaintiffs Zhala Tawfiq, Three
21 Brothers Taco Shop, Inc. and
22
23
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Exhibit *A*



Jimmie Parker <jdparker@gmail.com>

Kalasho

Jimmie Davis Parker, Esq. <jdparker@gmail.com>
To: "Stephen J. Liosi, Esq." <attorneylios@gmail.com>

Tue, Aug 22, 2017 at 9:05 AM

[REDACTED]

Steve,

Can we please set up a time to have a call? I have the following items on the agenda.

[REDACTED]

2) **Insurance information.** I have propounded the requests and I hope to see the actual insurance documents in the time provided for response. [REDACTED]

3) **Cross-Claim.** We need a meet and confer pursuant to CCP 430.41 and CCP 128.7. The cross-complaint is patently sanctionable and absurd on its face. It will not withstand scrutiny on demurrer, motion to strike and/or an anti-SLAPP motion. I will be asking for sanctions for the filing unless it is withdrawn as it was clearly filed for improper purposes of press attention and retaliation.

The majority of the "causes of action" are not actually causes of action and/or stem from clearly protected conduct (filing of a lawsuit, speaking to the press about the lawsuit, etc.). Moreover, you allege that my clients defamed and intentionally inflicted emotional distress upon the Kalashos by the mere filing of the lawsuit for conduct in which we now have incontrovertible proof your client is responsible for; it is pretty reprehensible that a victim of online bullying by a city councilman has to endure the continued harassment at the hands of their tormentor by being wrongly sued in retaliation for seeking justice.

Lastly, you do not indicate how, nor the actual terms of, a contract that was allegedly breached by Tawfiq.

These are all fatal flaws in the Cross.

Please advise if you intend on withdrawing or amended your Complaint so that I may prepare my responsive filings appropriately.

4) **Computer discovery.** Your client offered inspection. I agreed to it. I have proposed a protocol to ensure confidence that the computer we inspect is the one that will provide us the best information and I have yet to hear back. This has been two weeks pending. Also provide the requested Facebook information to further exonerate your clients. If we cannot agree to a protocol, it makes sense to go in *ex parte* to have the judge issue his thoughts on it.

5) **Witness Tampering.** Amazingly you allege that my client has been attempting to tamper with witnesses in your cross-complaint. Unfortunately, I have proof that Mr. Kalasho is tampering with witnesses and extra-judicially interfering with lawfully issued subpoenas. This makes Matrix's refusal to comply with my subpoena your problem as well as mine. If you and your client do not ensure sure Matrix (and any and all other witnesses) comply with the subpoena issued and I am forced to go to Court to compel compliance, I will have no choice but to attach exhibits establishing that Mr. Kalasho was interfering with my clients' discovery rights.

There is a lot to talk about here Steve and I am under a short fuse to respond to the bogus cross-complaint you put your name on along with many other matters that demand my time.

We have missed quite a few scheduled calls. Let's make sure this one we schedule is attended.

Thanks,

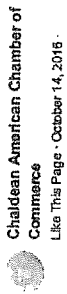
Jimmie

Exhibit B

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



Write a comment...

Search & Find a Page

Friend Requests

Chantel Parker

Confirm Friend

See All

aptus
COURT REPORTING

Exhibit: 10

Witness: J. Dedek

Date: 10-4-17

Exhibit C

BEST MEXICAN FOOD IN EL CAJON CONTEST

RESULTS

RATE
US!



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



Middle Eastern 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

Most Recent

30 shares

25 Comments



Mike McHugh Hacienda is the right place for #1 best Mexican food in East County and San Diego Food is a awesome and always has been Had great food when it was Antonio's then Marietta's bought it and food went down hill changing cooks. Tony and Cindy Bought it 8 years ago returned the original recipe's found old cooks and servers and brought them back Tacos, enchilada's, fajita's every thing is great

Like · Reply · November 10, 2016 at 1:15pm



Priscilla Martinez 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 are authentic. Try again buddy.

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

View 2 more replies



Middle Eastern 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



Write a comment...

aptus
COURT REPORTING

Exhibit: 11

Witness: J. Dettle

Date: 10-4-17

Exhibit D

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Jimmie Davis Parker, Esq. (SBN 252023) Law Office of Jimmie Davis Parker, APC 4241 Arden Way San Diego, California 92103 TELEPHONE NO.: 619.887.3300 FAX NO.: E-MAIL ADDRESS: JDParker@gmail.com ATTORNEY FOR (Name): Zhala Tawfiq	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: 330 West Broadway CITY AND ZIP CODE: San Diego 92101 BRANCH NAME: Main - Central	
PLAINTIFF/PETITIONER: Zhala Tawfiq DEFENDANT/RESPONDENT: Miss Middle East BEauty Pageant, Inc.; et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: 37-2017-00019692-CU-FI

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
JotForm, Inc. c/o Dennis Sullivan 601 California Street 16th Floor San Francisco, California 94108

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer):	
On (date) :	At (time):
Location (address):	
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- a. ☒ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

See Attachment 3

☒ Continued on Attachment 3.

- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: July 13, 2017

Jimmie Davis Parker, Esq.

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney at Law

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Zhala Tawfiq	CASE NUMBER:
DEFENDANT/RESPONDENT: Miss Middle East BEauty Pageant, Inc.; et al.	37-2017-00019692-CU-FI

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

▶ _____

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

▶ _____

(SIGNATURE)

Tawfiq v. Miss Middle East Beauty Pageant USA, Inc.; Bessmon Kalasho, et al.
Superior Court of California
County of San Diego
Case No. 37-2017-00019692-CU-FR-CTL
Attachment 3 to Deposition Subpoena for Production of Business Records

THE PEOPLE OF THE STATE OF CALIFORNIA, TO:

Jotform, Inc.
Registered Agent: DENNIS SULLIVAN
601 CALIFORNIA STREET, 16TH FLOOR SAN FRANCISCO CA 94108

You have been subpoenaed to produce the following categories of documents (reasonable costs will be incurred by the requesting party):

1. **Please produce ANY AND ALL** account information, documents, communications, subscriber identifying information, click counts, view counts, forms created, forms stored, IP addresses, log-in information, email addresses, phone numbers, associated with the account that loaded and had controlling access to jotform.com's services at the following URL: <https://form.jotform.com/51548591948167> (in particular the forms and information contained thereon, located at the cited URL as they existed on October 18, 2016, October 16, 2016; June 7, 2015; and June 8, 2015).

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. Dedden
 Date: 10-4-19

Exhibit E

<https://www.facebook.com/DuraidHallak/posts/10154387099517745>

EXHIBIT F

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Jimmie Davis Parker, Esq. (SBN 252023) Law Office of Jimmie Davis Parker 4241 Arden Way San Diego, California 92103 TELEPHONE NO.: 619.887.3300 FAX NO.: E-MAIL ADDRESS: JDParker@gmail.com ATTORNEY FOR (Name): Zhala Tawfiq	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: 330 West Broadway CITY AND ZIP CODE: San Diego 92101 BRANCH NAME: Central	
PLAINTIFF/PETITIONER: Zhala Tawfiq DEFENDANT/RESPONDENT: Miss Middle East Beauty Pageant, Inc.; et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: 37-2017-00019692-CU-FR-CTL

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Facebook, Inc. c/o "CSC" 2710 Gateway Oaks Dr STE 150N Sacramento, California 95833

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer):

On (date) :

At (time):

Location (address):

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☒ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

Records requested described on Attachment 3

☒ Continued on Attachment 3.

- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: May 31, 2017

Jimmie Davis Parker, Esq.

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney at Law

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Zhala Tawfiq	CASE NUMBER:
DEFENDANT/RESPONDENT: Miss Middle East Beauty Pageant, Inc.; et al.	37-2017-00019692-CU-FR-CTL

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

▶ _____

(SIGNATURE)

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:

▶ _____

(SIGNATURE)

Tawfiq v. Miss Middle East Beauty Pageant USA, Inc.; Bessmon Kalasho, et al.
Superior Court of California
County of San Diego
Case No. 37-2017-00019692-CU-FR-CTL
Attachment 3 to Deposition Subpoena for Production of Business Records

THE PEOPLE OF THE STATE OF CALIFORNIA, TO:

Facebook, Inc.

Registered Agent: CORPORATION SERVICE COMPANY WHICH WILL DO BUSINESS IN
CALIFORNIA AS CSC - LAWYERS INCORPORATING SERVICE
2710 GATEWAY OAKS DR STE 150N
SACRAMENTO, CALIFORNIA 95833

You have been subpoenaed to produce the following categories of documents (reasonable costs will be incurred by the requesting party):

1. **Please produce ANY AND ALL** non-content, non-exempt basic subscriber information from the below-listed Facebook and Instagram accounts from the date of the accounts' inception to the present. The information for each account should include but is not limited to, associated email addresses, cell phone numbers, IP addresses, log-in dates, times, and IP addresses and account creation/deletion email addresses, cell phone numbers, dates, times, and IP addresses and/or all other non-exempt information that may be helpful in identifying the individuals who control and have access to the accounts listed.

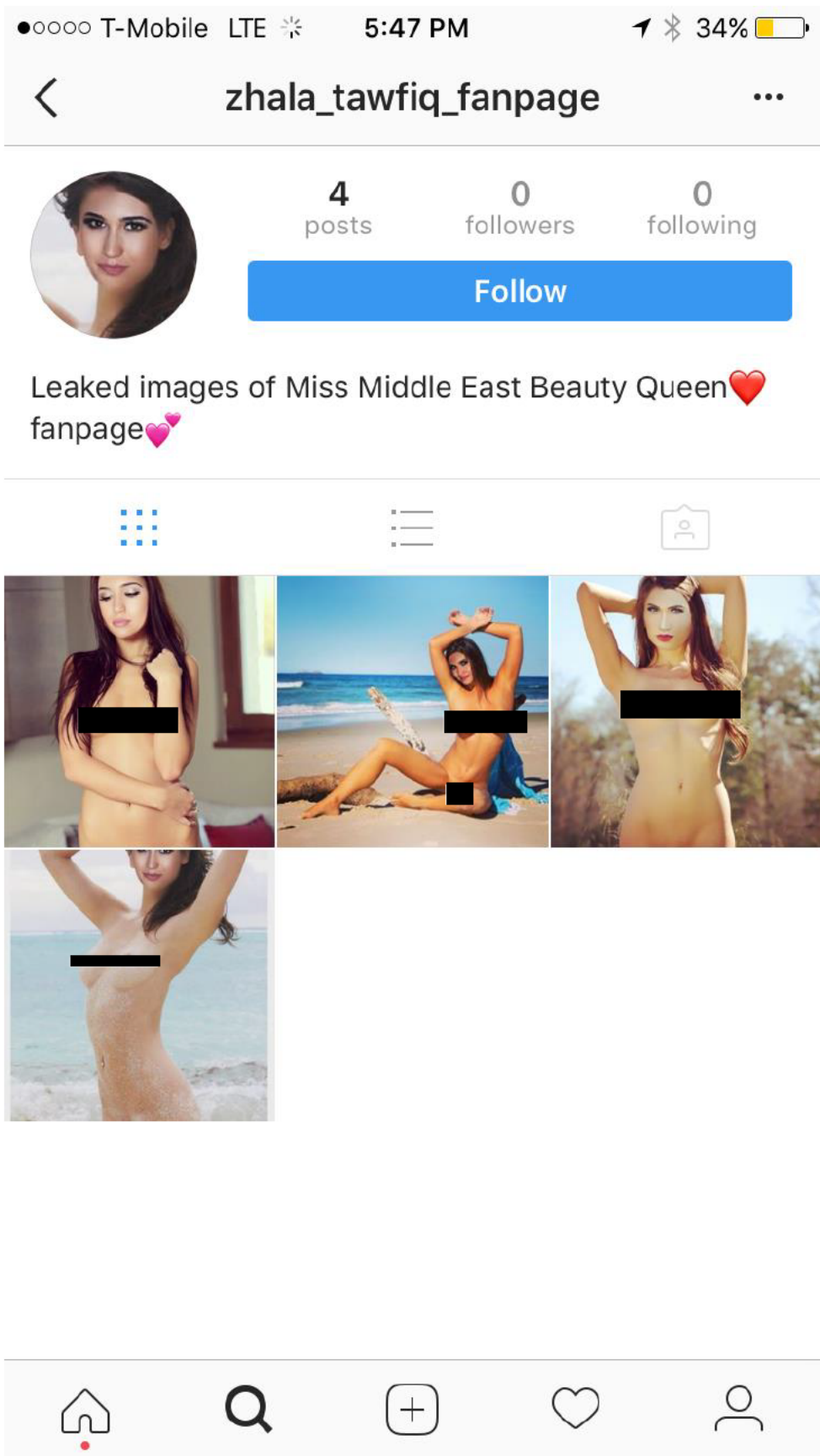
Facebook Accounts:

1. Ben George - URL - <https://www.facebook.com/ben.george.967> (deleted on or about June 26, 2017)
2. Melissa Peirson - URL - <https://www.facebook.com/profile.php?id=100009491748798> (deleted on or about June 26, 2017)
3. Robert Forbes - URL - <https://www.facebook.com/robert.singer.9210> (deleted on or about June 26, 2017)
4. Chantel Parker - URL - <https://www.facebook.com/chantel.parker.52035>
5. Ben Kalasho – URL - <https://www.facebook.com/ben.kalasho.7>
6. Jessica Kalasho – URL - <https://www.facebook.com/jessica.kalasho>
7. Middle Eastern Chamber of Commerce – URL
<https://www.facebook.com/MiddleEasternChamber/>
8. Miss Middle East Beauty Pageant – URL -
<https://www.facebook.com/missmiddleeastusa/>
9. Matt Awabi – URL - <https://www.facebook.com/matt.abawi>

Instagram Accounts:

1. “zhala_tawfiq_fanpage” (Please refer to screenshot of the account provided herein.)
2. “sam_yousif1977”

2. **Please produce ANY AND ALL** non-content, non-exempt, identifying information embedded in, or hidden in, any of the images uploaded to the Instagram Account “zhala_tawfiq_fanpage”. This information may be known as EXIF data or other metadata that may exist as identifying information hidden within the properties of the uploaded images and which may be useful in identifying the otherwise anonymous creator and publisher of the actionable content.



3.

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. 49m

Follow



Exhibit G

Service Facebook
Target 100009491748798
Generated 2017-08-14 17:37:18 UTC
Date Range 2004-01-01 00:00:00 UTC to 2017-07-13 23:59:00 UTC
Name
 First Me ssa
 Middle
 Last Pe rson

Registered 100009491748798@facebook.com
Email me ssape rson5@gma .com
Addresses

Vanity Name

Registration 2015-06-05 04:28:23 UTC
Date

Registration Ip 72.192.179.215

Account Closure Date **Account Still** fa se
 Active
 Time 2017-06-26 03:56:03 UTC

Phone
Numbers

Credit Cards

Logins

IP Address	72.197.218.86
Time	2017-06-26 03:54:25 UTC
Location	WWW
IP Address	72.197.218.86
Time	2017-03-29 05:28:42 UTC
Location	WWW
IP Address	72.197.218.86
Time	2017-03-25 01:33:08 UTC
Location	WWW
IP Address	2607:fb90:4881:7746:0:43:c0c2:8201
Time	2016-12-01 19:26:15 UTC
IP Address	107.139.75.98
Time	2016-12-01 19:23:15 UTC
IP Address	2607:fb90:22c6:e5af:0:48:3e41:201
Time	2016-10-23 01:01:01 UTC
IP Address	2607:fb90:2284:6b6c:0:22:fb87:2701

Time

2016-10-22 04:57:07 UTC

IP Address 2607:fb90:2264:4b7:0:5:c59e:c101**Time** 2016-10-21 21:14:38 UTC**IP Address** 72.197.218.86**Time** 2016-10-20 23:34:02 UTC**IP Address** 72.197.218.86**Time** 2016-10-20 23:22:36 UTC**IP Address** 172.58.19.199**Time** 2016-10-20 07:04:18 UTC**IP Address** 72.197.218.86**Time** 2016-10-19 21:16:45 UTC**IP Address** 72.197.218.86**Time** 2016-10-19 20:25:27 UTC**IP Address** 72.197.218.86**Time** 2016-10-19 19:23:01 UTC**IP Address** 72.197.218.86**Time** 2016-10-19 17:28:40 UTC**IP Address** 72.197.218.86**Time** 2016-10-19 05:56:59 UTC**IP Address** 72.197.218.86**Time** 2016-10-18 17:14:43 UTC**IP Address** 2605:e000:2301:b400:1493:49e1:1485:36ca**Time** 2016-10-16 21:38:30 UTC**IP Address** 2605:e000:2301:b400:1493:49e1:1485:36ca**Time** 2016-10-16 21:29:40 UTC**IP Address** 2605:e000:2301:b400:1493:49e1:1485:36ca**Time** 2016-10-16 20:56:13 UTC**IP Address** 172.58.19.59**Time** 2016-10-12 05:57:25 UTC**IP Address** 72.197.218.86**Time** 2016-10-10 05:40:31 UTC**IP Address** 2607:fb90:54e:ff48:0:b:f7af:b901**Time** 2016-10-08 18:03:28 UTC**IP Address** 172.56.16.68**Time** 2016-10-05 21:20:27 UTC**IP Address** 2602:306:b8b4:b620:d8c5:7146:1aeb:71db**Time** 2016-10-03 21:38:27 UTC**IP Address** 107.139.75.98**Time** 2016-09-29 15:58:30 UTC

IP Address 72.197.218.86
Time 2016-09-28 05:10:27 UTC

IP Address 2607:fb90:5ac:e985:0:3:e2a7:6401
Time 2016-09-26 00:37:18 UTC

IP Address 70.166.17.247
Time 2016-09-24 18:57:31 UTC

IP Address 72.197.218.86
Time 2016-09-18 16:35:47 UTC

IP Address 72.197.218.86
Time 2016-09-11 16:47:28 UTC

IP Address 72.197.218.86
Time 2016-09-01 02:40:12 UTC

IP Address 72.197.218.86
Time 2016-08-30 04:10:03 UTC

IP Address 72.197.218.86
Time 2016-08-24 06:32:06 UTC

IP Address 72.197.218.86
Time 2016-08-20 06:56:50 UTC

IP Address 2602:306:b8b4:b620:68ee:f3d1:10d2:abc0
Time 2016-08-19 21:48:34 UTC

IP Address 2602:306:b8b4:b620:f19b:d7f:b4c4:70f3
Time 2016-08-16 16:44:08 UTC

IP Address 2607:fb90:5bd:7e3b:0:3:f644:2701
Time 2016-08-09 22:48:23 UTC

IP Address 2607:fb90:4c2e:d1f6:0:4f:b9a7:2201
Time 2016-08-04 18:14:36 UTC

IP Address 2602:306:b8b4:b620:4c2d:34ad:243c:3ce0
Time 2016-07-30 16:45:02 UTC

IP Address 2602:306:b8b4:b620:68c9:2394:b716:dec3
Time 2016-07-24 21:35:47 UTC

IP Address 2600:8801:8906:cd00:d043:c166:e7d0:9803
Time 2016-07-10 08:39:07 UTC

IP Address 2602:306:b8b4:9320:214f:b1b7:e5e7:ab32
Time 2016-07-06 23:21:39 UTC
Location WWW

IP Address 2600:8801:8906:cd00:ec1f:ee1f:98f5:7393
Time 2016-07-04 06:49:14 UTC

IP Address 2602:306:b8b4:9320:49cf:8651:a156:b466
Time 2016-07-03 16:51:49 UTC

IP Address 2600:8801:8906:cd00:8417:6359:6cb6:23a6
Time 2016-06-25 04:45:06 UTC

IP Address 2602:306:b8b4:9320:f5a9:6639:5bfc:b4d2
Time 2016-06-20 19:08:56 UTC

IP Address 2600:8801:8906:cd00:19d:34c4:9a4f:8fe7
Time 2016-06-13 05:43:48 UTC

IP Address 2600:8801:8906:cd00:e124:257a:354f:d8e1
Time 2016-05-31 04:35:59 UTC
Location WWW

IP Address 2600:8801:8906:cd00:7008:44ad:b565:7998
Time 2016-05-29 18:15:17 UTC
Location WWW

IP Address 2600:8801:8906:cd00:c0b0:a5cb:8338:3fd9
Time 2016-05-11 04:03:10 UTC
Location WWW

IP Address 2600:8801:8906:cd00:1f7:fc7f:e391:a7be
Time 2016-05-04 04:11:14 UTC
Location WWW

IP Address 2602:306:b8b4:9320:5d82:f577:d3df:3150
Time 2016-04-23 22:01:37 UTC

IP Address 2602:306:b8b4:9320:488e:4b02:4206:62b5
Time 2016-04-20 23:37:47 UTC
Location WWW

IP Address 2600:8801:8906:cd00:2949:f79c:ddd6:13ad
Time 2016-04-19 04:26:13 UTC
Location WWW

IP Address 2607:fb90:5b7:353b:0:4b:9a8a:6801
Time 2016-04-12 07:33:27 UTC

IP Address 2600:8801:8906:cd00:adb2:2a0d:201f:945e
Time 2016-04-09 05:00:52 UTC
Location WWW

IP Address 2607:fb90:220b:b5d3:0:31:36fa:7a01
Time 2016-04-06 23:44:07 UTC

IP Address 72.192.179.215
Time 2016-04-05 03:50:01 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-04-05 03:23:52 UTC

IP Address 2607:fb90:2271:3d41:0:a:c0d8:6501
Time 2016-04-01 23:09:52 UTC

IP Address 72.192.179.215
Time 2016-03-29 21:11:00 UTC

IP Address

72.192.179.215

Time 2016-03-28 16:46:17 UTC**IP Address** 2607:fb90:483c:5464:0:1a:40c4:ff01**Time** 2016-03-26 03:56:52 UTC**IP Address** 2605:e000:ae8a:9e00:847f:cceb:46f8:668f**Time** 2016-03-21 05:00:48 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-03-19 19:24:38 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:b11c:1c53:66d1:a214**Time** 2016-03-17 21:45:13 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-03-14 07:02:51 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-03-11 08:51:34 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-03-11 07:49:14 UTC**IP Address** 2607:fb90:54f:446e:0:45:8217:1**Time** 2016-03-09 08:32:42 UTC**IP Address** 72.192.179.215**Time** 2016-03-07 07:10:46 UTC**IP Address** 72.192.179.215**Time** 2016-02-29 04:26:55 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-02-24 05:59:51 UTC**IP Address** 72.192.179.215**Time** 2016-02-19 16:43:12 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-02-18 00:52:30 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-02-16 07:34:15 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-02-16 06:27:34 UTC**Location** WWW

IP Address 72.192.179.215
Time 2016-02-16 06:25:31 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-02-15 04:58:26 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-02-12 05:41:18 UTC
Location WWW

IP Address 2602:306:b8b4:9320:5c80:f485:4ee2:c001
Time 2016-02-11 21:58:54 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-01-18 01:00:23 UTC

IP Address 72.192.179.215
Time 2016-01-17 20:14:40 UTC
Location WWW

IP Address 2607:fb90:5a4:7dcb:0:49:823:6201
Time 2016-01-15 21:02:48 UTC

IP Address 72.192.179.215
Time 2016-01-10 04:48:27 UTC

IP Address 2607:fb90:2209:482d:0:37:c693:c901
Time 2016-01-05 05:50:32 UTC

IP Address 72.192.179.215
Time 2015-12-31 05:01:18 UTC

IP Address 2607:fb90:485d:1c7f:0:4a:d1b9:9601
Time 2015-12-30 21:13:11 UTC

IP Address 72.192.179.215
Time 2015-12-29 02:27:32 UTC
Location WWW

IP Address 2607:fb90:546:8983:0:29:be07:6901
Time 2015-12-28 17:59:33 UTC

IP Address 72.192.179.215
Time 2015-12-28 03:16:58 UTC

IP Address 2607:fb90:2201:44f5:0:1b:6bbd:fc01
Time 2015-12-23 22:27:21 UTC

IP Address 72.192.179.215
Time 2015-12-12 04:33:21 UTC

IP Address 72.192.179.215
Time 2015-12-09 23:23:38 UTC

IP Address 72.192.179.215

Time 2015-12-05 01:55:09 UTC
Location WWW

IP Address 107.139.73.50
Time 2015-12-04 17:36:18 UTC

IP Address 2607:fb90:220e:658:0:2d:627d:6801
Time 2015-11-29 18:06:56 UTC

IP Address 2607:fb90:2203:9116:0:45:570b:1001
Time 2015-11-28 03:44:00 UTC

IP Address 2607:fb90:540:8c42:0:19:b827:7401
Time 2015-11-25 06:31:37 UTC

IP Address 2607:fb90:2208:4af8:0:8:17b7:f701
Time 2015-11-20 00:52:01 UTC

IP Address 2607:fb90:2208:4af8:0:8:17b7:f701
Time 2015-11-20 00:48:11 UTC

IP Address 2607:fb90:2204:98c7:0:20:8728:b801
Time 2015-11-20 00:00:45 UTC

IP Address 72.192.179.215
Time 2015-11-19 05:45:14 UTC

IP Address 72.192.179.215
Time 2015-11-18 04:13:45 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-11-17 03:15:01 UTC
Location WWW

IP Address 2607:fb90:547:84d2:0:23:84e4:f901
Time 2015-11-17 01:16:32 UTC

IP Address 72.192.179.215
Time 2015-11-15 03:04:29 UTC

IP Address 2607:fb90:2203:5df8:0:4:88b1:2d01
Time 2015-11-13 04:48:16 UTC

IP Address 72.192.179.215
Time 2015-11-10 19:10:17 UTC

IP Address 2607:fb90:54f:964b:0:48:9e7f:6701
Time 2015-11-09 03:39:33 UTC

IP Address 72.192.179.215
Time 2015-11-04 06:51:45 UTC
Location WWW

IP Address 2607:fb90:650:1777:0:c:e61c:1a01
Time 2015-11-02 19:52:30 UTC

IP Address 72.192.179.215

Time

2015-10-30 07:32:27 UTC

IP Address 2607:fb90:21c9:f8cc:0:1f:664c:2501**Time** 2015-10-28 17:02:14 UTC**IP Address** 72.192.179.215**Time** 2015-10-21 05:40:15 UTC**Location** WWW**IP Address** 64.134.228.23**Time** 2015-10-20 22:50:54 UTC**Location** WWW**IP Address** 2607:fb90:212f:4682:0:49:b77:c601**Time** 2015-10-15 21:46:22 UTC**IP Address** 2607:fb90:212f:4682:0:49:b77:c601**Time** 2015-10-15 21:35:41 UTC**IP Address** 2607:fb90:218f:f72b:0:9:dc37:6e01**Time** 2015-10-03 19:15:34 UTC**IP Address** 2607:fb90:2166:f8b9:0:37:24da:7c01**Time** 2015-09-30 20:38:32 UTC**IP Address** 2607:fb90:2286:d89c:0:16:bdd7:6501**Time** 2015-09-28 01:30:57 UTC**IP Address** 2607:fb90:2290:437b:0:b:154c:a001**Time** 2015-09-22 07:06:25 UTC**IP Address** 72.192.179.215**Time** 2015-09-22 04:50:14 UTC**Location** WWW**IP Address** 2607:fb90:542:fccf:0:34:32a4:5201**Time** 2015-09-19 07:26:24 UTC**IP Address** 2607:fb90:542:fccf:0:34:32a4:5201**Time** 2015-09-19 07:23:54 UTC**IP Address** 2607:fb90:542:fccf:0:34:32a4:5201**Time** 2015-09-18 19:55:48 UTC**IP Address** 64.134.228.23**Time** 2015-09-14 16:35:33 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-11 03:49:40 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-11 03:48:26 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-11 03:32:07 UTC

Location

WWW

IP Address 72.192.179.215**Time** 2015-09-09 16:48:28 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-05 06:59:14 UTC**Location** WWW**IP Address** 2607:fb90:637:ef69:0:45:54db:c901**Time** 2015-09-04 17:55:34 UTC**IP Address** 72.192.179.215**Time** 2015-09-02 03:11:45 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-01 04:01:39 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-01 03:05:27 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-06-05 05:06:42 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-06-05 04:28:23 UTC**Location** WWW**Logouts****Time** 2017-06-26 03:56:04 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2017-06-26 03:56:03 UTC**Location** WWW**IP Address** 72.197.218.86

Service Facebook
Target 100007836847067
Generated 2017-08-14 17:37:32 UTC
Date Range 2004-01-01 00:00:00 UTC to 2017-07-13 23:59:00 UTC
Name
 First Robert
 Middle
 Last Forbes

Registered robert.s nger.9210@facebook.com
Email k ntgeorge1950rr2@gma .com
Addresses

Vanity Name robert.s nger.9210

Registration 2014-02-22 01:18:10 UTC
Date

Registration Ip 2602:304:cef3:7060:e2f8:47ff:fe43:d868

Account Closure Date
Account Still Active fa se
Time 2017-06-26 04:09:58 UTC

Phone Numbers

Credit Cards

Logins
IP Address 72.197.218.86
Time 2017-06-26 04:09:12 UTC
Location WWW
IP Address 2602:306:b8b4:b620:3439:965b:6d63:ee36
Time 2017-06-19 21:13:24 UTC
Location WWW
IP Address 72.197.218.86
Time 2017-06-07 17:00:23 UTC
Location WWW
IP Address 72.197.218.86
Time 2017-05-10 07:00:03 UTC
Location WWW
IP Address 107.139.75.98
Time 2017-04-05 19:32:42 UTC
Location WWW
IP Address 72.197.218.86
Time 2017-03-24 00:14:13 UTC

Location

WWW

IP Address 107.139.75.98**Time** 2017-03-08 19:32:11 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2017-02-13 04:58:17 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2017-02-06 05:24:48 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2017-01-16 21:23:22 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2017-01-09 20:09:56 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2017-01-09 03:16:36 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-12-10 22:43:47 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-12-07 02:39:20 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-11-16 14:40:08 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-11-16 14:27:14 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-11-10 05:16:47 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-11-09 12:47:59 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-11-07 03:46:27 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-11-04 19:16:21 UTC**Location** WWW

IP Address 107.139.75.98
Time 2016-11-03 21:27:54 UTC
Location WWW

IP Address 72.197.218.86
Time 2016-11-01 22:56:26 UTC
Location WWW

IP Address 72.197.218.86
Time 2016-11-01 16:57:54 UTC
Location WWW

IP Address 72.197.218.86
Time 2016-11-01 16:38:46 UTC
Location WWW

IP Address 72.197.218.86
Time 2016-11-01 06:41:00 UTC
Location WWW

IP Address 107.139.75.98
Time 2016-10-21 21:21:17 UTC
Location WWW

IP Address 72.197.218.86
Time 2016-10-20 23:23:27 UTC
Location WWW

IP Address 108.255.202.208
Time 2016-10-20 06:47:06 UTC
Location WWW

IP Address 107.139.75.98
Time 2016-10-19 17:37:05 UTC
Location WWW

IP Address 107.139.75.98
Time 2016-10-19 17:27:22 UTC
Location WWW

IP Address 107.139.75.98
Time 2016-10-19 17:11:10 UTC
Location WWW

IP Address 108.255.202.208
Time 2016-10-19 06:48:56 UTC
Location WWW

IP Address 107.139.75.98
Time 2016-10-18 19:08:53 UTC
Location WWW

IP Address 72.197.218.86
Time 2016-10-13 05:31:53 UTC
Location WWW

IP Address 107.139.75.98
Time 2016-10-12 19:17:03 UTC

Location

WWW

IP Address 107.139.75.98**Time** 2016-10-12 18:55:14 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-10-12 18:50:34 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-10-06 20:11:16 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-29 15:55:20 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-29 15:49:47 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-29 15:47:51 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-14 19:01:22 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-14 17:58:02 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-14 17:53:20 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-09-13 21:02:57 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-08-05 02:26:11 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-07-28 16:43:06 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-07-14 01:52:33 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-07-12 06:06:15 UTC**Location** WWW

IP Address 72.192.179.215
Time 2016-07-12 05:50:41 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-07-12 03:20:39 UTC
Location WWW

IP Address 2600:8801:8906:cd00:3961:1aed:aa05:305b
Time 2016-07-05 03:15:00 UTC
Location WWW

IP Address 2600:8801:8906:cd00:f1e8:6cd:8d10:eb
Time 2016-06-20 01:35:31 UTC
Location WWW

IP Address 2602:306:b8b4:9320:5193:6427:9f36:fe54
Time 2016-05-28 21:38:05 UTC
Location WWW

IP Address 2600:8801:8906:cd00:981b:5f7a:babf:b526
Time 2016-05-28 03:32:51 UTC
Location WWW

IP Address 2602:306:b8b4:9320:9ed:823:77:a3ca
Time 2016-05-25 19:02:04 UTC
Location WWW

IP Address 2602:306:b8b4:9320:9ed:823:77:a3ca
Time 2016-05-25 18:54:50 UTC
Location WWW

IP Address 2600:8801:8906:cd00:a4e9:4dfd:74a0:d248
Time 2016-05-23 05:50:51 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-05-14 06:48:10 UTC
Location WWW

IP Address 2600:8801:8906:cd00:2d39:14fd:c5c6:bcde
Time 2016-05-06 16:02:35 UTC
Location WWW

IP Address 2600:8801:8906:cd00:2d39:14fd:c5c6:bcde
Time 2016-05-06 04:52:47 UTC
Location WWW

IP Address 2600:8801:8906:cd00:e8ed:a05e:3210:87d1
Time 2016-05-04 03:37:24 UTC
Location WWW

IP Address 2602:306:b8b4:9320:d900:92d:1dba:67f
Time 2016-05-01 23:21:01 UTC
Location WWW

IP Address 2602:306:b8b4:9320:d900:92d:1dba:67f
Time 2016-05-01 22:48:34 UTC

Location

WWW

IP Address 2602:306:b8b4:9320:c5d0:9706:c3d3:be4d**Time** 2016-04-26 19:54:29 UTC**Location** WWW**IP Address** 2600:8801:8906:cd00:915a:3c7a:4385:9894**Time** 2016-04-26 01:26:53 UTC**Location** WWW**IP Address** 2600:8801:8906:cd00:915a:3c7a:4385:9894**Time** 2016-04-26 01:25:22 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:20aa:f469:5d40:517b**Time** 2016-04-24 16:55:15 UTC**Location** WWW**IP Address** 2600:8801:8906:cd00:bcc7:5f58:67e2:4490**Time** 2016-04-24 06:33:30 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-04-24 06:30:19 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:8fc:604d:22ab:dd3e**Time** 2016-04-23 23:04:20 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:8fc:604d:22ab:dd3e**Time** 2016-04-23 22:47:35 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:818e:2e37:fab3:bf2f**Time** 2016-04-23 21:38:29 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:818e:2e37:fab3:bf2f**Time** 2016-04-23 18:03:53 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:818e:2e37:fab3:bf2f**Time** 2016-04-23 17:55:34 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:818e:2e37:fab3:bf2f**Time** 2016-04-23 17:41:17 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:818e:2e37:fab3:bf2f**Time** 2016-04-23 16:59:36 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:2124:7931:144c:51d0**Time** 2016-04-23 16:43:53 UTC**Location** WWW

IP Address 2600:8801:8906:cd00:4874:be8:2532:3771
Time 2016-04-23 14:49:33 UTC
Location WWW

IP Address 2600:8801:8906:cd00:4874:be8:2532:3771
Time 2016-04-23 07:33:53 UTC
Location WWW

IP Address 2600:8801:8906:cd00:4874:be8:2532:3771
Time 2016-04-23 06:55:50 UTC
Location WWW

IP Address 2600:8801:8906:cd00:4874:be8:2532:3771
Time 2016-04-23 06:41:54 UTC
Location WWW

IP Address 2602:306:b8b4:9320:f825:2d2b:2bc7:4810
Time 2016-04-23 00:06:29 UTC
Location WWW

IP Address 2600:8801:8906:cd00:49e7:bacc:4c80:8a05
Time 2016-04-22 01:00:51 UTC
Location WWW

IP Address 2602:306:b8b4:9320:7c5e:bd0c:3e18:ef1e
Time 2016-04-20 23:37:25 UTC
Location WWW

IP Address 2602:306:b8b4:9320:d03d:5cdd:caa5:be75
Time 2016-04-12 16:33:57 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-04-05 04:54:43 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-04-02 05:46:22 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-04-02 03:11:31 UTC
Location WWW

IP Address 2602:306:b8b4:9320:d529:abf3:7339:50c5
Time 2016-03-19 19:04:48 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-03-07 06:08:55 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-03-07 06:08:06 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-03-02 06:43:38 UTC

Location

WWW

IP Address 72.192.179.215**Time** 2016-02-24 05:58:32 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-02-24 05:56:32 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-02-11 03:39:54 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:51f1:3b20:cce2:e968**Time** 2016-02-10 22:21:54 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:51f1:3b20:cce2:e968**Time** 2016-02-10 22:20:47 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:39bf:e7a3:e342:34af**Time** 2016-02-09 00:32:05 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:c1c3:9e23:d6f4:3d5e**Time** 2016-02-04 16:37:55 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:68a9:5546:5c5c:5197**Time** 2016-01-27 20:17:44 UTC**Location** WWW**IP Address** 107.139.73.50**Time** 2016-01-27 20:10:04 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-18 03:31:06 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-18 03:28:58 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-12 07:07:45 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-11 02:10:44 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-12-23 22:29:01 UTC**Location** WWW

IP Address 72.192.179.215
Time 2015-12-03 05:39:11 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-11-28 04:46:17 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-11-18 04:11:48 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-11-12 03:08:03 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-11-11 07:06:47 UTC
Location WWW

IP Address 107.139.73.50
Time 2015-11-08 18:17:31 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-11-08 01:36:47 UTC
Location WWW

IP Address 2602:306:b8b4:9320:c0f6:ba98:34e1:ab8f
Time 2015-11-07 22:06:04 UTC
Location WWW

IP Address 107.139.73.50
Time 2015-10-31 22:27:45 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-10-29 01:09:37 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-10-26 01:50:38 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-10-25 18:31:38 UTC
Location WWW

IP Address 2602:306:b8b4:9320:526:24e:2ad1:e6e4
Time 2015-10-25 17:19:49 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-10-25 01:26:52 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-10-25 01:13:45 UTC

Location

WWW

IP Address 72.192.179.215**Time** 2015-10-21 05:34:47 UTC**Location** WWW**IP Address** 2607:fb90:6cd:e4be:0:16:3055:8701**Time** 2015-10-04 00:38:17 UTC**IP Address** 107.139.73.50**Time** 2015-10-03 18:59:35 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:8db8:1352:3bc5:4912**Time** 2015-09-04 16:51:16 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-04 03:17:12 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-09-03 01:52:27 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-08-31 22:34:03 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:6093:e362:e451:5f58**Time** 2015-08-31 21:22:35 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-08-30 03:40:17 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:9d88:b72a:a1f6:fb3b**Time** 2015-08-05 19:08:12 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-07-22 04:18:17 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:6c52:cb53:a6ac:e93**Time** 2015-07-17 16:11:15 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2015-07-10 15:22:54 UTC**Location** WWW**IP Address** 2602:306:b8b4:9d30:515b:b094:4b32:31c8**Time** 2015-07-06 17:26:38 UTC**Location** WWW**IP Address** 2602:306:b8b4:9d30:38db:b1b0:3a16:ea46

Time 2015-07-03 18:14:19 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-07-01 05:25:46 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-06-29 22:07:56 UTC
Location WWW

IP Address 2602:306:b8b4:9d30:1c51:b20c:551c:a839
Time 2015-06-29 18:42:57 UTC
Location WWW

IP Address 2602:306:b8b4:9d30:1c51:b20c:551c:a839
Time 2015-06-29 18:39:17 UTC
Location WWW

IP Address 2602:306:b8b4:9d30:10a0:63db:c3b0:73bd
Time 2015-06-25 18:35:24 UTC
Location WWW

IP Address 2602:306:b8b4:9d30:1da8:d571:166b:d81e
Time 2015-06-13 15:47:01 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-06-09 02:59:30 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-06-05 04:25:57 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-06-04 05:16:08 UTC
Location WWW

IP Address 2602:306:b8b4:9d30:bcc7:9613:aa10:f559
Time 2015-05-28 21:16:39 UTC
Location WWW

IP Address 72.192.179.215
Time 2015-05-23 22:39:13 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-05-21 03:47:10 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-05-19 02:29:25 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-05-19 02:06:26 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-05-19 01:51:04 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-05-19 01:47:55 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-04-20 02:30:55 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-04-07 02:05:16 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-03-30 07:23:04 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-03-30 07:18:59 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-03-25 03:02:08 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-03-24 02:00:52 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-03-23 05:05:05 UTC
Location WWW

IP Address 2602:304:cef3:7060:dc61:4091:f8e4:690c
Time 2015-01-31 21:26:25 UTC
Location WWW

IP Address 2602:304:cef3:7060:dc61:4091:f8e4:690c
Time 2015-01-31 21:24:46 UTC
Location WWW

IP Address 2602:304:cef3:7060:4dd4:c294:54c1:fdc9
Time 2015-01-31 17:33:09 UTC
Location WWW

IP Address 72.192.162.123
Time 2015-01-31 06:47:42 UTC
Location WWW

IP Address 2602:304:cef3:7060:75a9:7736:1c64:a6dc
Time 2014-12-23 17:42:26 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-12-22 23:49:46 UTC

Location

WWW

IP Address 2602:304:cef3:7060:2071:7cf5:2b1d:b7d8**Time** 2014-12-13 20:21:49 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:5c51:f83:ffc5:4ceb**Time** 2014-12-11 21:04:20 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:5c51:f83:ffc5:4ceb**Time** 2014-12-11 21:03:39 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:500:3fbf:b676:42f8**Time** 2014-12-07 23:48:30 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:5c82:d717:78ac:5707**Time** 2014-12-06 23:58:00 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:9004:8d9b:d9fa:47a5**Time** 2014-11-17 21:40:09 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:750e:f2a:fd41:6c4e**Time** 2014-11-16 20:56:37 UTC**Location** WWW**IP Address** 72.192.162.123**Time** 2014-11-11 04:09:41 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:854a:41fe:79e6:8d83**Time** 2014-11-08 21:42:53 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:3513:1c7d:5238:562**Time** 2014-10-27 15:44:04 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:c18c:454c:f0e:9236**Time** 2014-10-23 21:13:20 UTC**Location** WWW**IP Address** 72.192.162.123**Time** 2014-10-23 04:41:46 UTC**Location** WWW**IP Address** 2602:304:cef3:7060:5856:d9c5:5890:7e66**Time** 2014-10-22 20:28:07 UTC**Location** WWW**IP Address** 72.192.162.123**Time** 2014-10-02 13:46:50 UTC**Location** WWW

IP Address 72.192.162.123
Time 2014-10-02 02:16:30 UTC
Location WWW

IP Address 2602:304:cef3:7060:fd77:7174:94c2:250e
Time 2014-09-30 21:44:40 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-09-24 01:50:41 UTC
Location WWW

IP Address 2602:304:cef3:7060:ac52:cc99:cf7:43fb
Time 2014-09-16 15:35:03 UTC
Location WWW

IP Address 2602:304:cef3:7060:54c:bd68:5e07:44ce
Time 2014-09-15 23:25:44 UTC
Location WWW

IP Address 2602:304:cef3:7060:54c:bd68:5e07:44ce
Time 2014-09-15 23:18:44 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-19 06:21:39 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-19 01:22:51 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-15 01:43:29 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-09 03:24:47 UTC
Location WWW

IP Address 2602:304:cef3:7060:30c4:a31c:ca5:eca7
Time 2014-08-05 18:57:30 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-02 03:37:10 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-02 03:32:13 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-08-02 03:24:56 UTC
Location WWW

IP Address 2602:304:cef3:7060:4ce6:95ff:399b:358d
Time 2014-07-31 20:30:01 UTC

Location

WWW

IP Address 2602:304:cef3:7060:4ce6:95ff:399b:358d
Time 2014-07-31 20:23:17 UTC
Location WWW

IP Address 2602:304:cef3:7060:8501:6cd0:b2e5:951e
Time 2014-07-22 18:24:11 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-07-21 23:15:53 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-07-16 03:51:41 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-07-16 00:44:47 UTC
Location WWW

IP Address 2602:304:cef3:7060:b0e6:5bdb:143d:1de0
Time 2014-07-07 18:19:42 UTC
Location WWW

IP Address 2602:304:cef3:7060:7480:e63b:9334:eb3e
Time 2014-06-11 15:57:27 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-06-02 23:30:47 UTC
Location WWW

IP Address 2602:304:cef3:7060:486:6645:e4db:2484
Time 2014-05-31 21:44:47 UTC
Location WWW

IP Address 2602:304:cef3:7060:ad7e:ca87:df7b:9576
Time 2014-05-30 22:38:01 UTC
Location WWW

IP Address 2602:304:cef3:7060:f406:b06c:f3de:88ef
Time 2014-05-29 16:22:16 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-05-29 04:19:57 UTC
Location WWW

IP Address 72.192.162.123
Time 2014-05-29 03:35:59 UTC
Location WWW

IP Address 2602:304:cef3:7060:99a4:45c0:f0a2:3fa7
Time 2014-05-29 01:12:50 UTC
Location WWW

Logouts

Time 2017-06-26 04:09:59 UTC
Location WWW
IP Address 72.197.218.86

Time 2017-06-26 04:09:59 UTC
Location WWW
IP Address 72.197.218.86

Time 2017-06-19 21:16:13 UTC
Location WWW
IP Address 2602:306:b8b4:b620:3439:965b:6d63:ee36

Time 2017-06-07 17:01:47 UTC
Location WWW
IP Address 72.197.218.86

Time 2017-05-10 07:05:42 UTC
Location WWW
IP Address 72.197.218.86

Service Facebook
Target 100011030981619
Generated 2017-08-14 17:37:08 UTC
Date Range 2004-01-01 00:00:00 UTC to 2017-07-13 23:59:00 UTC
Name
 First Ben
 Middle
 Last George

Registered ben.george.967@facebook.com
Email jam n19833@gma .com
Addresses

Vanity Name ben.george.967

Registration 2016-01-07 20:10:52 UTC
Date

Registration Ip 72.192.179.215

Account **Account Still** fa se
Closure Date **Active**
 Time 2017-06-26 03:56:20 UTC

Phone
Numbers

Credit Cards

Logins
IP Address 72.197.218.86
 Time 2017-06-26 03:54:47 UTC
 Location WWW
IP Address 72.197.218.86
 Time 2016-11-10 05:15:57 UTC
 Location WWW
IP Address 72.197.218.86
 Time 2016-11-10 05:09:03 UTC
 Location WWW
IP Address 72.197.218.86
 Time 2016-11-10 05:06:47 UTC
 Location WWW
IP Address 72.197.218.86
 Time 2016-11-10 01:48:13 UTC
 Location WWW
IP Address 72.197.218.86
 Time 2016-11-10 01:46:02 UTC

Location

WWW

IP Address 107.139.75.98**Time** 2016-11-03 21:33:39 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-10-20 23:35:04 UTC**Location** WWW**IP Address** 108.255.202.208**Time** 2016-10-20 07:03:50 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-10-19 20:11:32 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-10-19 17:39:00 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-10-19 17:13:20 UTC**Location** WWW**IP Address** 72.197.218.86**Time** 2016-08-24 00:34:36 UTC**Location** WWW**IP Address** 107.139.75.98**Time** 2016-07-28 16:41:22 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-07-14 01:53:20 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:386b:dcb4:a008:f2e5**Time** 2016-05-18 19:57:09 UTC**Location** WWW**IP Address** 2600:8801:8906:cd00:892:ea7f:e01c:8c3**Time** 2016-05-14 22:16:53 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:fcc4:b6c9:caaf:5f66**Time** 2016-05-13 21:06:20 UTC**Location** WWW**IP Address** 107.139.73.50**Time** 2016-05-13 20:41:23 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:8ced:e723:ddd:d73a**Time** 2016-05-13 20:21:03 UTC**Location** WWW

IP Address 2602:306:b8b4:9320:8ced:e723:ddd:d73a
Time 2016-05-13 20:07:19 UTC
Location WWW

IP Address 2602:306:b8b4:9320:8ced:e723:ddd:d73a
Time 2016-05-13 19:47:45 UTC
Location WWW

IP Address 2602:306:b8b4:9320:8ced:e723:ddd:d73a
Time 2016-05-13 19:27:32 UTC
Location WWW

IP Address 2602:306:b8b4:9320:8ced:e723:ddd:d73a
Time 2016-05-13 17:22:25 UTC
Location WWW

IP Address 2602:306:b8b4:9320:818e:2e37:fab3:bf2f
Time 2016-04-23 17:54:17 UTC
Location WWW

IP Address 2602:306:b8b4:9320:818e:2e37:fab3:bf2f
Time 2016-04-23 17:13:42 UTC
Location WWW

IP Address 2602:306:b8b4:9320:f825:2d2b:2bc7:4810
Time 2016-04-23 00:11:46 UTC
Location WWW

IP Address 2602:306:b8b4:9320:7c5e:bd0c:3e18:ef1e
Time 2016-04-20 23:48:21 UTC
Location WWW

IP Address 2602:306:b8b4:9320:d529:abf3:7339:50c5
Time 2016-03-19 19:05:58 UTC
Location WWW

IP Address 2602:306:b8b4:9320:d529:abf3:7339:50c5
Time 2016-03-19 19:05:33 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-02-05 07:25:00 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-02-05 06:06:02 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-01-30 06:14:09 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-01-30 06:13:22 UTC
Location WWW

IP Address 72.192.179.215
Time 2016-01-29 04:40:42 UTC

Location

WWW

IP Address 2602:306:b8b4:9320:95e7:110f:2410:9eee**Time** 2016-01-28 22:56:39 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-28 06:17:04 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:68a9:5546:5c5c:5197**Time** 2016-01-27 21:15:05 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:68a9:5546:5c5c:5197**Time** 2016-01-27 20:19:45 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:68a9:5546:5c5c:5197**Time** 2016-01-27 20:16:04 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-18 03:33:11 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-18 03:31:20 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-18 03:30:34 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-18 03:28:04 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-11 02:11:49 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:54fa:1b71:93d5:4ecb**Time** 2016-01-09 21:37:47 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:b8ee:a74e:7597:fd50**Time** 2016-01-09 19:19:22 UTC**Location** WWW**IP Address** 2602:306:b8b4:9320:b8ee:a74e:7597:fd50**Time** 2016-01-09 19:14:50 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-08 04:45:36 UTC**Location** WWW

IP Address

72.192.179.215

Time 2016-01-08 01:43:26 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-08 00:58:20 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-08 00:54:58 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-08 00:22:12 UTC**Location** WWW**IP Address** 108.255.203.47**Time** 2016-01-07 20:58:15 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-07 20:34:41 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-07 20:26:27 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-07 20:22:41 UTC**Location** WWW**IP Address** 72.192.179.215**Time** 2016-01-07 20:11:27 UTC**Location** WAP**IP Address** 72.192.179.215**Time** 2016-01-07 20:10:54 UTC**Location** WWW**Logouts****Time** 2017-06-26 03:56:21 UTC**Location** WWW**IP Address** 72.197.218.86

Certificate of Authenticity of Domestic Records of Regularly Conducted Activity

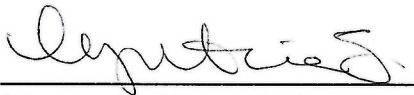
Under California Evidence Code section 1561, I Cynthia Velazquez, certify:

1. I am employed by Facebook, Inc., located in Menlo Park, California. I am a duly authorized custodian of records for Facebook and am qualified to certify Facebook's domestic records of regularly conducted activity.
2. I have reviewed the records produced by Facebook in response to the subpoena to Facebook dated July 13, 2017, in the case of Zhala Tawfiq v. Miss Middle EastBeauty Pageant USA, Inc. v. Bessmon Kalasho, et al., San Diego County Superior Court of California, Case No. 37-2017-00019692-CU-FR-CTL. The records are those located after a reasonable search and are true copies of the reasonably available basic subscriber information associated with the Facebook ID's:

ben.george.967
100009491748798
robert.singer.9210
chantel.parker.52035
ben.kalasho.7
jessica.kalasho
middleeasternchamber
missmiddleeastusa
matt.abawi

3. The records provided were made and kept by the automated systems of Facebook in the course of regularly conducted activity as a regular practice of Facebook. The records were made at or near the time the information was transmitted by the Facebook account holder.

I declare under penalty of perjury under the laws of the State of California that the foregoing certification is true and correct to the best of my knowledge.



(Signature of Records Custodian)

Date: September 19, 2017

Cynthia Velazquez

(Name of Records Custodian)

Exhibit H

Jimmie Davis Parker, Esq. (SNB 252023)
Law Office of Jimmie Davis Parker
4241 Arden Way San Diego, California 92103
 TELEPHONE NO.: **619.887.3300** FAX NO. _____
 E-MAIL ADDRESS: **JDParker@gmail.com**
 ATTORNEY FOR (Name): **Zhala Tawfig, et al.**

FOR COURT USE ONLY

SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego

STREET ADDRESS: 330 West Broadway
MAILING ADDRESS: 330 West Broadway
CITY AND ZIP CODE: San Diego 92103
BRANCH NAME: Central

PLAINTIFF/PETITIONER: Zhala Tawfiget al.

DEFENDANT/RESPONDENT: Bessmon Kalasho, et al.

AMENDED DEPOSITION SUBPOENA
FOR PRODUCTION OF BUSINESS RECORDS

CASE NUMBER:

37-2017-00019692-CU-FE

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):

Cox Communications, Inc. 6205-B Peachtree Dunwoody Road Atlanta GA 30328

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Jimmie Parker, Esq

On (date) : 9/21/2017

At (time): 10 AM

Location (address): 4241 Arden Way San Diego CA 92103 (OR VIA EMAIL) JDParker@gmail.com

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. *The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):*

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **Sept. 5, 2017** Sept. 7, 2017

Jimmie Parker, Esq.

(TYPE OR PRINT NAME)

► 17th

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney at Law

(Proof of service on reverse)

(TITLE)

PLAINTIFF/PETITIONER: Zhala Tawfiqet al.	CASE NUMBER:
DEFENDANT/RESPONDENT: Bessmon Kalasho, et al.	37-2017-00019692-CU-FI

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name): **Cox Communications**

b. Address where served:

SubpoenaResponse@cox.com

c. Date of delivery: **Sept. 5, 2017** Sept. 7, 2017

d. Time of delivery: **8 PM** 11 AM

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.


g. ☒ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

**Jimmie Parker
Law Office of Jimmie Davis Parker
4241 Arden Way
San Diego, CA 92103**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: **Sept 5, 2017** Sept. 7, 2017

▶ 

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

▶ _____
(SIGNATURE)

Tawfiq v. Miss Middle East Beauty Pageant USA, Inc.; Bessmon Kalasho, et al.
Superior Court of California
County of San Diego
Case No. 37-2017-00019692-CU-FR-CTL
Attachment 3 to Deposition Subpoena for Production of Business Records

THE PEOPLE OF THE STATE OF CALIFORNIA, TO:
Cox Communications, Inc. ATTN: Records Custodian
6205-B Peachtree Dunwoody Road
Atlanta, GA 30328
SubpoenaResponse@cox.com

You have been subpoenaed to produce the following categories of documents (reasonable costs will be incurred by the requesting party):

1. **Please produce ANY AND ALL** non-content, non-exempt basic subscriber information from the below-identified IP addresses. The information for the accounts should include but is not limited to, associated email addresses, cell phone numbers, account numbers, names on the account, IP address history and physical addresses of the subscriber from account inception to present.

Please produced the above-subpoenaed information for the accounts that were assigned the following IP addresses:

- 72.197.218.86 in use on or about Sept. 2016 to July 2017.
- 72.192.179.215 in use on or about June 2015 to June 2016.
- 72.192.162.123 in use on or about June 2014 to April 2015.
- 2600:8801:8404:c900:a4d2:1407:b305:dd0d in use on or about June, 13 2016.
- 2600:8801:8906:cd00:2dff:cefl:3493:32ad in use on or about July 19, 2016.
- 2600:8801:8906:cd00:4874:be8:2532:3771 in use on or about April 2016.
- 2600:8801:8906:cd00:892:ea7f:e01c:8c3 in use on or about May 2016.
- 2600:8801:8906:cd00:8417:6359:6cb6:23a6 is use on or about June 2016.
- 70.166.17.247 in use on or about September 2016 to Present.



Subpoena Compliance Office
Cox Communications, Inc.
6205B Peachtree Dunwoody Rd. 16th Floor
Atlanta, GA 30328
(404) 269-0100
FAX: (404) 269-1898
SubpoenaResponse@cox.com

TO: jdparker@gmail.com

From: Subpoena Response Office

Cox Communications

Tawfiqet v. Kalasho, et al

Date: Wednesday, October 04, 2017

Re: Customer Information Request

Number of pages (including cover): _____

In response to the referenced and attached, Cox Communications answers with the enclosed information.

We ask that you check to assure that the search performed was accurate and responsive before proceeding with its use. The information provided is from Cox systems of record, which are maintained for its business purposes and not for law enforcement or litigation matters. As such, Cox Communications accepts no responsibility for any use you may make of this response.

Also attached is an invoice for payment of the charges associated with this response.

Please note the current service and related information on the schedule attached.

Jacqueline Murray
Subpoena Specialist
Subpoena Compliance Office
Cox Communications

Responsive Records

72.197.218.86 in use on or about Sept. 2016 to July 2017.
72.192.179.215 in use on or about June 2015 to June 2016.
72.192.162.123 in use on or about June 2014 to April 2015.
2600:8801:8906:cd00:2dff:cef1:3493:32ad in use on or about July 19, 2016.
2600:8801:8906:cd00:4874:be8:2532:3771 in use on or about April 2016.
2600:8801:8906:cd00:892:ea7f:e01c:8c3 in use on or about May 2016.
2600:8801:8906:cd00:8417:6359:6cb6:23a6 is use on or about June 2016.

BEN KALASHO

1620 CLIFFDALE ROAD

EL CAJON, CA 92020

COX ACCOUNT NO. 63660-05

COX EMAIL ACCOUNT benkalasho@cox.net

**AUTHORIZED USER –
JESSICA**

IP HISTORY LOGS

IP Address	RDC	CM MAC*****	CPE MAC	Client ID	Hostname	Starts (GMT)	Ends (GMT)
72.197.218.86	sd	D4:0A:A9:52:4C:9D	2C:30:33:EB:0B:7F			2016-07-20 23:30:48	2017-10-05 20:04:34
2600:8801:ff00:900:35a8:4ea0:ee59:3158	sd	D4:0A:A9:52:4C:9D	10:9A:DD:68:FE:A5			2016-07-21 00:40:23	2016-07-22 00:52:00
72.192.178.185	sd	D4:0A:A9:52:4C:9D	10:9A:DD:68:FE:A5			2016-07-21 00:40:20	2016-07-22 00:42:13
172.19.197.186	sd	D4:0A:A9:52:4C:9D	2C:30:33:EB:0B:7F			2016-07-20 23:17:48	2016-07-21 00:21:09
172.19.197.184	sd	D4:0A:A9:52:4C:9D	EC:71:DB:98:2F:1A			2016-07-20 23:11:25	2016-07-21 00:15:14

PREVIOUS CM MAC (MODEM)

IP Address	RDC	CM MAC*****	CPE MAC	Client ID	Hostname	Starts (GMT)	Ends (GMT)
72.192.179.215	sd	44:94:FC:AF:5E:51	44:94:FC:AF:5E:52			2015-05-23 20:34:28	2016-07-20 18:10:57
2600:8801:8906:cd00:: - 2600:8801:8906:cdff:ffff:ffff:ffff:ffff	sd	44:94:FC:AF:5E:51	44:94:FC:AF:5E:52			2016-04-06 17:57:53	2016-07-20 15:16:00
2600:8801:ff00:900:80e6:9fad:ee7d:48c6	sd	44:94:FC:AF:5E:51	44:94:FC:AF:5E:52			2016-04-06 17:57:53	2016-07-20 15:16:00
72.197.216.177	sd	44:94:FC:AF:5E:51	44:94:FC:AF:5E:52			2015-05-22 11:10:49	2015-05-23 18:11:15
72.192.162.123	sd	44:94:FC:AF:5E:51	44:94:FC:AF:5E:52			2015-03-11 17:19:56	2015-05-22 12:01:53
72.192.162.123	sd	44:94:FC:AF:5E:51	44:94:FC:AF:5E:52			2014-05-06 06:28:26	2015-03-08 05:19:51

2600:8801:8404:c900:a4d2:1407:b305:dd0d in use on or about June, 13 2016.

SUHAILA ABAWI

1704 HORIZON HEIGHTS CIR

EL CAJON, CA 92019

COX ACCOUT NO. 907261-05

NO COX EMAIL ACCOUNT

AUTHORED USER - MATTHEW ABAWI

IP HISTORY LOGS

IP Address	RDC	CM MAC*****	CPE MAC	Client ID	Hostname	Starts (GMT)	Ends (GMT)
172.19.209.135	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2017-02-04 20:28:29	2017-02-05 01:13:32
2600:8801:8403:ac00:: - 2600:8801:8403:acff:ffff:ffff:ffff:ffff	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-12-08 20:57:34	2017-02-04 20:27:16
2600:8801:ff00:400:58db:b8b0:ab2:76f1	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-12-08 20:57:34	2017-02-04 20:27:16
72.199.254.33	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-12-08 20:57:25	2017-02-04 20:27:13
2600:8801:8403:ac00:: - 2600:8801:8403:acff:ffff:ffff:ffff:ffff	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-12-08 20:40:08	2016-12-08 20:54:24
2600:8801:ff00:400:95dd:9cd6:d77c:e320	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-12-08 20:40:08	2016-12-08 20:54:24
72.197.163.24	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-12-08 20:39:56	2016-12-08 20:54:21
2600:8801:8404:c900:: - 2600:8801:8404:c9ff:ffff:ffff:ffff:ffff	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-05-10 07:37:14	2016-12-08 20:38:34
2600:8801:ff00:400:9c5f:3792:69da:7b66	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-05-10 07:37:14	2016-12-08 20:38:34
72.197.163.58	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2015-07-29 22:39:52	2016-12-08 20:38:31
2600:8801:8404:c900:: - 2600:8801:8404:c9ff:ffff:ffff:ffff:ffff	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-04-07 11:14:14	2016-05-10 07:35:40
2600:8801:ff00:400:7d7a:20b2:fa:683	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2016-04-07 11:14:14	2016-05-10 07:35:40
172.16.209.133	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2015-07-29 07:08:58	2015-07-29 22:37:39
98.176.135.14	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2015-05-22 11:40:08	2015-07-29 20:33:32
72.199.203.14	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2015-05-22 09:29:02	2015-05-22 10:59:11
72.199.200.127	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2015-02-22 02:31:21	2015-05-22 10:29:44
172.19.209.238	sd	20:0C:C8:E1:1C:C8	20:0C:C8:E1:1C:C9			2015-02-22 02:11:54	2015-02-22 03:15:14

70.166.17.247 in use on or about September 2016 to Present.

STARBUCKS

ATTN: ERIKA VALDEZ

9325 MISSION GORGE ROAD

SANTEE, CA 92071

COX ACCOUNT NO. 217633-05

NO COX EMAIL ACCOUNT

****IP HISTORY LOGS ARE NOT AVAILABLE FOR STATIC IP ADDRESSES**

Exhibit I

<u>Account</u>	<u>IP Owner</u>	<u>IP Address</u>	<u>Reg. or Log-in Date</u>	<u>UTC Time</u>	<u>ISP</u>	<u>City</u>
Ben George Facebook	Ben Kalasho	72.192.179.215	1/7/2016	20:26	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/7/2016		Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	7/14/2016		Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	2/5/2016	7:25	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	2/5/2016	6:06	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/30/2016	6:14	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/30/2016	6:13	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/29/2016	4:40	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/28/2016		Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/18/2016	3:33	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/18/2016	3:31	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/18/2016	3:30	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/18/2016	3:28	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/18/2016	2:11	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/8/2016	4:45	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/8/2016	1:43	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/8/2016	0:58	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/8/2016	0:54	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/8/2016	0:22	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/7/2016	20:34	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/7/2016	20:22	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/7/2016	20:11	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.192.179.215	1/7/2016	20:10	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	6/26/2017		Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	6/26/2017		Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	11/10/2016	3:54	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	11/10/2016	5:15	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	11/10/2016	5:09	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	11/10/2016	5:06	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	11/10/2016	1:48	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	11/10/2016	1:46	Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	10/20/2016		Cox Communications	El Cajon
Ben George Facebook	Ben Kalasho	72.197.218.86	8/24/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	6/5/2015		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	6/5/2015		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	4/5/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	4/5/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/29/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/28/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/19/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/14/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/11/2016	8:51	Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/11/2016	7:49	Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	3/7/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	2/29/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	2/24/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.192.179.215	2/19/2016	16:43	Cox Communications	El Cajon

Melissa Peirson Facebook	Ben Kalasho	72.197.218.86	9/11/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.197.218.86	9/1/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.197.218.86	8/30/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.197.218.86	8/24/2016		Cox Communications	El Cajon
Melissa Peirson Facebook	Ben Kalasho	72.197.218.86	8/20/2016		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-05-21 03:47:10 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-05-19 02:29:25 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-05-19 02:06:26 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-05-19 01:51:04 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-05-19 01:47:55 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-04-20 02:30:55 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-04-07 02:05:16 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-03-30 07:23:04 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2015-03-30 07:18:59 UTC		Cox Communications	El Cajon
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Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2014-08-02 03:37:10 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2014-08-02 03:32:13 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2014-08-02 03:24:56 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2014-07-21 23:15:53 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.162.123	2014-07-16 03:51:41 UTC		Cox Communications	El Cajon
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Robert Forbes Facebook	Ben Kalasho	72.192.179.215	2015-09-04 03:17:12 UTC	Cox Communications	El Cajon
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Robert Forbes Facebook	Ben Kalasho	72.192.179.215	2015-07-01 05:25:46 UTC	Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.179.215	2015-06-29 22:07:56 UTC	Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.179.215	2015-06-09 02:59:30 UTC	Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.179.215	2015-06-05 04:25:57 UTC	Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.192.179.215	2015-06-04 05:16:08 UTC	Cox Communications	El Cajon
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Robert Forbes Facebook	Ben Kalasho	72.197.218.86	2017-05-10 07:05:42 UTC	Cox Communications	El Cajon
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Robert Forbes Facebook	Ben Kalasho	72.197.218.86	2016-11-07 03:46:27 UTC	Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.197.218.86	2016-11-01 22:56:26 UTC	Cox Communications	El Cajon
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Robert Forbes Facebook	Ben Kalasho	72.197.218.86	2016-10-13 05:31:53 UTC		Cox Communications	El Cajon
Robert Forbes Facebook	Ben Kalasho	72.197.218.86	2016-08-05 02:26:11 UTC		Cox Communications	El Cajon
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Exhibit J



Chaldean American Chamber of Commerce

@ChaldeanAmericanChamber

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on 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 Aikan 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 Pittina 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 Colixan 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. Idk

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 Peiron 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

Like

Like

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Fletcher Pkwy

(619) 663-7710

Typically replies within a few

Send Message

www.ChaldeanAmericanCha

Organization

Opens at 9:00am

Closed Now

Pages liked by this Page



Wireless R US



Sharp Rees-Stealy M



7-Eleven (9111 Missi

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CHALDEAN AMERICA CHAMBER OF COMMER

Search

Exhibit K

Posts

participating in this poll. Enjoy!

<http://www.ChaldeanAmericanChamber.com/>

BEST MEXICAN FOOD IN EL CAJON

CONTEST



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

Like

Comment

Share

7

Top Comments

30 shares



Write a comment.



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 at 10:17am · Edited

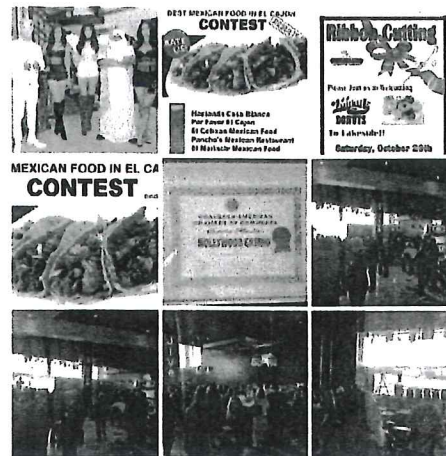


Chaldean American Chamber of Commerce We aren't interested in doing a video to bash restaurants. We wish every restaurant prosperity and success in our community. We hope that the ones who polled near the bottom will strive to improve rather than bash this post, the chamber or our polling.

Like · Reply · 1 · October 19 at 10:49am · Edited

chaldean american chamber of commerce

PHOTOS



VIDEOS

Chat (Off)



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 American
 Chamber of
 Commerce
 @ChaldeanAmericanCham
 ber

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Priscilla Hendon 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 are authentic. Try again buddy.

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

View 2 more replies



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 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 at 12:21am · Edited



Write a reply.



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 at 10:39am · Edited

Don't miss the November 11 SCOE
 Women's Networking Breakfast. Hear ...
 See More

1 Like

Like · Comment



Assyrian Forever
 August 13 at 3:29am

<https://www.facebook.com/Asssyrian/>

Like · Comment



Assyrian Forever
 August 13 at 3:29am

<https://www.facebook.com/Asssyrian/>

Like · Comment

LIKED BY THIS PAGE

aptus
 COURT REPORTING

Exhibit: 13

Witness: J. DeHleh

Date: 10-4-17

Exhibit L

Pageant Winner Contract Agreement

Date: 5/22/16

This Agreement is made between The Chaldean American Chamber of Commerce which owns the Miss Middle East Beauty Pageant referred to as "First Party" and the 1st Place Winner Zhala Tawfiq referred to as "Second Party".

The first party agrees that they will: Pay the second party the total sum of \$2,000 USD in 3 equal payments of \$666.66. The first Payment will be disbursed via check immediately. The second payment will be disbursed 6 months after the first check is to be deposited. The final payment will be disbursed the week before the 2017 Miss Middle East Beauty Pageant.

The second party covenants and agrees that it will: Post on any and all social media(s) any and all requests made by Ben Kalasho, Jessica Kalasho, The Chaldean American Chamber of Commerce and the Miss Middle East Pageant Organization.

Further more, second party agrees and acknowledges that they must appear at and sell 5 tickets to both the Royals Masquerade Ball and the 2017 Miss Middle East Pageant.

Finally, it is required that the Second party attend a minimum of 5 Chamber Events Annually.

Other observed terms between the first and second party: Are job scopes whereby appearances, photoshoots, modeling, commercials, promotions, political events, charity work and speaking engagements are pro bono and required by Second Party.

Fulfillment Clause: The second party must meet the requirements of this agreement in order to be paid above full amount of \$2,000.00 USD. If one or more requirements are not met in a timely manner decided by the Miss Middle East Pageant Committee and Chaldean Chamber Board of Directors then a forfeiture of prize money will be initiated. The Second Party understands that by signing this agreement, they will be bound and reviewed by the outlined terms and such penalties may arise.


This is the entire agreement. Both parties agree on what is stated above, and both realize that this is a binding contract between the parties, their successors, and personal representatives. The agreement will be enforced by the State of California

First Party:



Ben Kalasho, Founder & President

Second Party:



Zhala Tawfiq, 2016 Queen

Checks to be mailed to:

4241 Redwood Ave, Apt 2312
Marina Del Rey, CA 90266


COURT REPORTING

Exhibit:

Witness:

Date:

17
J. Decker
10-4-17

Exhibit M



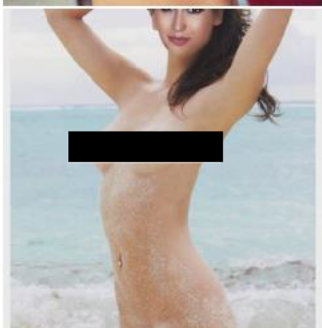
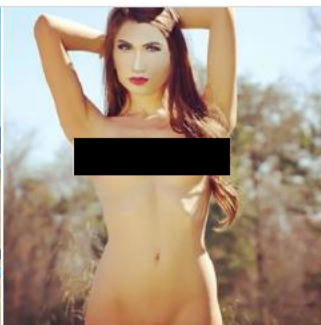
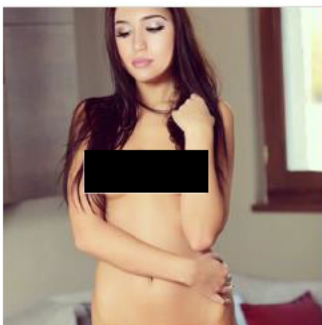
4
posts

0
followers

0
following

Follow

Leaked images of Miss Middle East Beauty Queen
fanpage



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 N

Service Instagram

Target 5059831582

Generated 2017-08-14 17:39:49 UTC

Date Range 2004-01-01 00:00:00 UTC to 2017-07-13 23:59:00 UTC

Name **First**

Registered zha a_tawf q@gma .com

Email

Addresses

Vanity Name zha a_tawf q_fanpage

Registration 2017-04-08 00:29:32 UTC
Date

Registration Ip 47.41.199.154

Account
Closure Date

Account Still fa se

Active

Time 2017-04-08 03:42:37 UTC

Phone
Numbers

Logins

IP Address 47.41.199.154

Time 2017-04-08 00:29:33 UTC

Instagram

Certificate of Authenticity of Domestic Records of Regularly Conducted Activity

Under California Evidence Code section 1561, I Cynthia Velazquez certify:

1. I am an authorized custodian of records for Instagram LLC and am qualified to certify Instagram's domestic records of regularly conducted activity.
2. I have reviewed the records produced by Instagram in this matter. The records include search results for basic subscriber information, for account identified by "zhala_tawfiq_fanpage" and "sam_yousif1977".
3. The records provided were made and kept by the automated systems of Instagram in the course of regularly conducted activity as a regular practice of Instagram. The records were made at or near the time the information was transmitted by the Instagram user.
4. I declare under penalty of perjury under the laws of the State of California that the foregoing certification is true and correct to the best of my knowledge.


(Signature of Records Custodian)

Date: September 19, 2017

Cynthia Velazquez

Exhibit O

October 27, 2017

James Davis Parker
Law Office of James Davis Parker, APC
4241 Arden Way
San Diego, CA 92103

Re: Charter Subscriber Information Request Dated 9/5/2017

Charter Case ID: 40344

Charter Communications, Inc., ("Charter") acknowledges receipt of the above referenced request for subscriber information. Pursuant to the specific obligations imposed by 18 U.S.C. §2703, this letter is to advise you that Charter investigated and was able to identify the attached information.

Charter's billing and customer records from which the above information is obtained are subject to human error and Charter cannot always guarantee the accuracy of such records. You should not rely solely on this information and should always independently corroborate the information Charter provides with other information you have concerning the identity of the individual.

We understand this satisfies Charter's obligations in this regard. If you would like to discuss this matter, please contact me at (314) 394-9731. When calling, please reference Charter case number 40344.

Respectfully,



ShaRayne Jackson
Paralegal
eroc@charter.com
www.charter.com/ea

SUBSCRIBER RECORD

Target Details	47.41.199.154, 4/8/2017 12:00:00 AM, GMT, 0
Subscr ber Name:	ELIE MALOUF
Subscr ber Address:	12432 PINE CREEK RD, CERRITOS, CA 90703-2045
User Name or Features:	SAMOURAM@AOL.COM
Phone number:	(562)572-9927, (562)926-5167
Advanced Subscriber Info	
Account Number:	8245100420186492
Other Details	
Other Informat on:	Lease Start Date: 2/08/2017, Lease End Date: 9/13/2017 IP H story: See Attachment.

DECLARATION OF CUSTODIAN OF RECORDS

Pursuant to 28 U.S.C. § 1746, I, the undersigned, do hereby declare:

1. My name is ShaRayne Jackson. I am over 18 years of age and employed by Charter Communications, Inc., ("Charter").
 2. Part of my job responsibilities is to review the records that Charter maintains relating to individual subscriber and customer accounts to specific business records.
 3. I make this declaration based on a review of Charter's business records which are created contemporaneously with the activity.
 4. These records are kept in the ordinary course of Charter's business and pertain to the regular business of Charter.
 5. I am in receipt of legal process served on 9/5/2017, signed by Judge David S. Parker, and requesting specific records of Charter.
 6. Attached to this declaration are records responsive to the request.
 7. These records are business records of Charter.
- I DECLARE under penalty of perjury that the foregoing is true and correct.



ShaRayne Jackson
Paralegal
Legal Response Operations Center
Charter Communications, Inc.
12405 Powerscourt Drive
St. Louis, Missouri 63131
eroc@charter.com
www.charter.com/ea

Exhibit P

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF SAN DIEGO

3
4 ZHALA TAWFIQ, LINA CHARRY, PARIS
5 KARGAR, 3 BROTHERS TACO SHOP,
INC. dba TRES TAQUERIA,

6 Plaintiffs,

7 vs. Case No.:
37-2017-00019692-CU-FR-CTL

8 MISS MIDDLE EAST BEAUTY PAGEANT

9 USA, INC., a California
10 non-profit corporation; BESSMON
KALASHO, an individual; JESSICA
11 KALASHO an individual; BESSMON
and JESSICA KALASHO, a married
12 couple, dba "Miss Middle East USA
Beauty Pageant"; MIDDLE EASTERN
13 CHAMBER OF COMMERCE fka SAN DIEGO
EAST COUNTY CHALDEAN AMERICAN
14 CHAMBER OF COMMERCE, a suspended
California non-profit
15 corporation; DOES 1-10,
inclusive,

16
17 Defendants.
18

19 VIDEOTAPED DEPOSITION of JESSICA MARIE DEDDEH,
20 VOLUME I, taken on behalf of Plaintiffs, at Aptus Court
21 Reporting at 600 West Broadway, Suite 300, San Diego,
22 California, beginning at 1:09 p.m., and ending at
23 4:18 p.m., on Wednesday, October 4, 2017, before Linda
24 E. Marquette, RPR, CLR, Certified Shorthand Reporter
25 No. 11874.

1 SAN DIEGO, CALIFORNIA; WEDNESDAY, OCTOBER 4, 2017

2 1:01 P.M. to 4:18 P.M.

3

4 THE VIDEOGRAPHER: We are now on the record.

5 Today's date is October 4th, 2017, and the time is

6 1:01 p.m.

7 This begins the video-recorded deposition of
8 Jessica Deddeh being taken on behalf of the plaintiff in
9 the matter of Zhala Tawfiq versus -- et al., versus Miss
10 Middle East Beauty Pageant USA, Inc., pending in the
11 Superior Court of the State of California, for the
12 County of San Diego. Case
13 No. 37-2017-00019692-CU-FR-CTL.

14 We are at Aptus Court Reporting.

15 And my name is Ryan Asanas, the videographer
16 of Aptus Court Reporting, located at 600 West Broadway,
17 Suite 300, San Diego, California 92101.

18 Will all counsel present please identify
19 yourselves and state whom you represent, starting with
20 the taking attorney.

21 MR. PARKER: My name is Jimmie Parker, Law
22 Offices of Jimmy Davis Parker. I represent 3 Brothers
23 Taco Shop, Incorporated, Zhala Tawfiq, and Paris Kargar.

24 MS. RAZOOKI: Sally Razooki on behalf of the
25 Law Offices of Jennifer Hasso for plaintiff, Lina

1 probably make copies of this, so let's just hold onto it
2 for now. We'll keep it separate. But I do want it
3 produced because I haven't seen it.

4 BY MR. PARKER:

5 Q. And the last thing you have is handwritten
6 notes.

7 A. Mm-hmm.

8 Q. And those are your notes?

9 A. Mm-hmm.

10 Q. Okay. Can I see that? Okay. All right.
11 Did you bring any other documents with you?

12 A. (Shakes head.)

13 Q. Did you speak with anyone regarding -- in
14 preparation for your deposition, aside from your
15 attorney?

16 A. No.

17 Q. And aside from your husband -- I'm assuming
18 you spoke with him -- did you speak with -- who is
19 "Stephanie Malouf"? Is that her last name?

20 A. Yes.

21 Q. Who is she?

22 A. She was the 2014 Miss Middle East.

23 Q. Are you friends with her?

24 A. I am friends with her.

25 Q. Okay. Did you talk to her about this lawsuit

1 BY MR. PARKER:

2 Q. Can you identify Exhibit 10 for me, please?

3 A. It says, "Best Mexican Food in El Cajon
4 Contest."

5 Q. And so that's something that was posted by the
6 Chamber?

7 A. Yes.

8 Q. And is there a JotForm link to that?

9 A. Yes.

10 Q. Did you create that graphic?

11 A. No.

12 Q. Do you know who did?

13 A. I don't know.

14 Q. Do you use Photoshop?

15 A. No.

16 Q. What programs do you use to create marketing
17 materials for Miss Middle East Beauty Pageant?

18 A. I don't create the marketing materials.

19 Q. Who does?

20 A. Ben is one of the people that creates
21 marketing material.

22 Q. Does Ben use Photoshop?

23 A. For -- for pageant-related stuff and for
24 fliers, for mixer events, yes.

25 Q. Like, for instance, for this graphic, was that

1 that anytime. She didn't need me to do the teeth
2 whitening. So -- and she had the dentist's phone number
3 so she could have easily gone in and -- and done that.
4 She didn't need me for it.

5 Q. Did King Aminpour donate \$2,000 to the 2016
6 Miss -- Miss Middle East Beauty Pageant?

7 A. Yeah. So there's a check of him holding it on
8 stage.

9 Q. And he donated that for the prize money?

10 A. Yes.

11 Q. Have you given King the \$666.66 that you
12 refused to give Zhala?

13 A. So that was to the pageant, so ...

14 Q. So the answer is "no"?

15 A. Zhala breached her contract so she wouldn't
16 get that 66- -- the last \$666.

17 Q. You -- is that -- you're keeping that \$666?
18 Have you given it back to King?

19 A. No. We have not.

20 Q. Okay. Why not?

21 A. That was his contribution to the beauty
22 pageant.

23 Q. He donated the prize, right?

24 A. Which is the contribution to the beauty
25 pageant.

1 Q. Have you told King this?

2 A. Personally?

3 Q. Yes.

4 A. That -- exactly what? That we will not be
5 giving him --

6 Q. That he paid a \$2,000 cash price and you've
7 paid \$1200 of it, and you're going to pocket the
8 remaining 666 of 1300?

9 A. It goes straight to the beauty pageant. And
10 he -- that wasn't his first time sponsoring the \$2,000
11 check.

12 MR. PARKER: Let's mark this next exhibit.

13 (Exhibit 17 marked for identification
14 by the Certified Shorthand Reporter.)

15 MR. PARKER: You already have this, Steve,
16 it's the contract.

17 MR. LIOSI: Oh, okay.

18 BY MR. PARKER:

19 Q. Do you recognize this?

20 A. Yes.

21 Q. And this is what?

22 A. The contract.

23 Q. This is the contract between Zhala and the
24 pageant, correct?

25 A. Yes.

1 **Q. And this is the contract that you allege Zhala**
2 **breached, correct?**

3 **A. This is the contract she breached.**

4 Q. Okay. When was the first time you notified
5 Zhala that there was a problem with her performance
6 under the terms of the contract?

7 A. Her and I had met. It was either end of March
8 or beginning of April, in person, before she went to
9 Kurdistan. And we had discussed -- that's when she
10 brought up the prizes. She had asked me when she could
11 do the photo shoot with Durrani and I had told her,
12 "When you come back, I will set that up for you, just
13 give me your schedule."

14 And then I had told her since we were at least
15 two months out, two months before our beauty pageant,
16 she would have to post on her social media pages,
17 Facebook and Instagram, that we're having our upcoming
18 beauty pageant.

19 She -- I told her, "There are fliers that I
20 want you to post." I e-mailed her. I texted her, and I
21 Facebook messaged her. I said, "Here are the fliers,"
22 and I wrote a description of what she could write.

23 She didn't have to keep those posts on for
24 very long. She could delete it right after. But as
25 part of her job as queen, she has to promote our

1 MR. LIOSI: Objection. Irrelevant.
2 BY MR. PARKER:
3 Q. Was it about 25 bucks?
4 A. I don't remember.
5 Q. And you said there was another video. So you
6 said the first one at your house, where was the second
7 video?
8 A. The second video was in Hollywood Hills. And
9 it was myself, Stephanie, and Elona shooting this
10 promotional video.
11 Q. Did you stay the weekend in Los Angeles?
12 A. I only stayed April 8th. And it was at
13 Elona's house.
14 Q. Where does Elona live?
15 A. Porter Ranch.
16 Q. What time -- how did you get there? How did
17 you get to -- strike that.
18 So it was a Los Angeles -- it was a Hollywood
19 Hills video.
20 When was that filmed?
21 A. I believe that was filmed April 8th.
22 Q. April 8th.
23 When did you drive up to the Los Angeles area?
24 A. I believe April 8th.
25 Q. April 8th?

1 STATE OF CALIFORNIA)
2)
3 COUNTY OF SAN DIEGO)

4 I, Linda E. Marquette, a Certified Shorthand
5 Reporter, do hereby certify:

6 That prior to being examined, the witness in the
7 foregoing proceedings was by me duly sworn to testify to
8 the truth, the whole truth, and nothing but the truth;

9 That said proceedings were taken before me at the
10 time and place therein set forth and were taken down by
11 me in shorthand and thereafter transcribed into
12 typewriting under my direction and supervision;

13 I further certify that I am neither counsel for,
14 nor related to, any party to said proceedings, nor in
15 anywise interested in the outcome thereof.

16 In witness whereof, I have hereunto subscribed my
17 name.

18
19 Dated: October 16, 2017

20
21 

22 _____
23 Linda E. Marquette
24 RPR, CLR, CSR No. 11874,
25

Pageant Winner Contract Agreement

Date: 5/22/16

This Agreement is made between The Chaldean American Chamber of Commerce which owns the Miss Middle East Beauty Pageant referred to as "First Party" and the 1st Place Winner Zhala Tawfiq referred to as "Second Party".

The first party agrees that they will: Pay the second party the total sum of \$2,000 USD in 3 equal payments of \$666.66. The first Payment will be disbursed via check immediately. The second payment will be disbursed 6 months after the first check is to be deposited. The final payment will be disbursed the week before the 2017 Miss Middle East Beauty Pageant.

The second party covenants and agrees that it will: Post on any and all social media(s) any and all requests made by Ben Kalasho, Jessica Kalasho, The Chaldean American Chamber of Commerce and the Miss Middle East Pageant Organization.

Further more, second party agrees and acknowledges that they must appear at and sell 5 tickets to both the Royals Masquerade Ball and the 2017 Miss Middle East Pageant.

Finally, it is required that the Second party attend a minimum of 5 Chamber Events Annually.

Other observed terms between the first and second party: Are job scopes whereby appearances, photoshoots, modeling, commercials, promotions, political events, charity work and speaking engagements are pro bono and required by Second Party.

Fulfillment Clause: The second party must meet the requirements of this agreement in order to be paid above full amount of \$2,000.00 USD. If one or more requirements are not met in a timely manner decided by the Miss Middle East Pageant Committee and Chaldean Chamber Board of Directors then a forfeiture of prize money will be initiated. The Second Party understands that by signing this agreement, they will be bound and reviewed by the outlined terms and such penalties may arise.

This is the entire agreement. Both parties agree on what is stated above, and both realize that this is a binding contract between the parties, their successors, and personal representatives. The agreement will be enforced by the State of California

First Party:


Ben Kalasho, Founder & President

Second Party:


Zhala Tawfiq, 2016 Queen

Checks to be mailed to:

4241 Redwood Ave, Apt 2312
Marina Del Rey, CA 90266

@ptus
COURT REPORTING

Exhibit: 17

Witness: J. Decker

Date: 10-4-17