

Alla Zorikova, acting Pro Se
5644 Park Oak Place,
Los Angeles, CA 90068
3232095186
Stevejohn19732017@gmail.com

LIST OF EXHIBITS

EXHIBIT 1

(Bryan Pease's knowingly false declaration under penalty of perjury claiming "daily ongoing threats=communication" by daughter of Zorikova)

EXHIBIT 2

(true and correct copies of random communication (if any)
by Olivia Jeong to Bryan Pease for extensive period of time)

EXHIBIT 3

(true and correct copy of call history from Olivia Jeong's phone for extensive amount of time.
There is NO a single phone area code that would starts from (619) – Bryan's phone number)

EXHIBIT 4

(true copies of emails sent by extensive amount of time)

EXHIBIT 5

(Notice of Violation of Residential Code)

EXHIBIT 6

(Court Order to Deem Alla Zorikova's Detention Never Occurred and to Seal
False Arrest Records, providing CA Penal Code's penalty for Violation of Such Order)
Court Order to deem arrest of Plaintiff Zorikova never occurred, to seal all arrest and related

records, to make illegal any sealed records dissemination to 3rd parties under CA Penal Code 851.91, 851.92.

Court order had been issued by Victorville Court on Sep 06 of 2023 and picked up by Alla Zorikova the clerk of the Court on about Sept 06 of 2023.

ZORIKOVA'S EXHIBIT 7

(Allegedly Fabricated by Bryan Pease "Vet Report" presented by Pease's witness Justin Smith")

ZORIKOVA'S EXHIBIT 8

(Casey's Gish Knowingly false Declaration followed by clear and convincing tangible evidences of falsity)

EXHIBIT 9

(trespassing and interfering with private property)

EXHIBIT 10

(Bryan sending to Alla Zorikova rape threats)

True and correct copy of Bryan's electronic message to Plaintiff sent in the late night-early morning of Nov 15 of 2024 after he "obtained" by fraud his "restraining order" prohibiting Plaintiff attend trial in this case and violating Plaintiff's substantial constitutional rights.

Bryan's Message is professionally done (as Bryan had been taught by dad and in school) violent threat of rape of Plaintiff.

EXHIBIT 11

(Warrants to Search Thieves, represented by Bryan Pease, property)

EXHIBIT 12

EXHIBIT 13

(DECLARATION OF BRYAN PEASE ADMITTING HIS POSTS UPON ZORIOVA)

Posts by Bryan Pease located in Bryan Pease's Declaration from Dec 18 of 2020

EXHIBIT 14

(ALLEGEDLY FABRICATED BY BRYAN PEASE, WHILE KNOWIGNLY FALSE DECLARATION BY JUSTIN SMITH, WITNESS OF BRYAN PEASE)

DECLARATION OF JUSTIN SMITH

EXHIBIT 15

(ANIMAL CONTROL REPORT SHOWING ALLA ZORIKOVA'S DOGS ALWAYS HAD BEEN FOUND HAVING FOOD, WATER, HAVING GOOD HEALTH, NOT BEING IN DISTRESS)

EXHIBIT 16

(MALICIOUS KNOWIGNLY FALSE UNLAWFUL POSTS BY BRYAN PEASE UPON ALLA ZORIKOVA)

EXHIBIT 17

(BRYAN PEASE UNLAWFULLY DISSEMINATES SEALED ZORIKOVA'S RECORDS. VIOLATION BY BRYAN PEASE CA PENAL CODE 851.92, 851.91)

Exhibit R is a true and correct copy of posts by Bryan Pease occurred AFTER Pease was served with Court Order prohibiting unlawful dissemination of Zorikova's sealed detention records and deem arrest never occurred . Dissemination in violation of CA Penal Codes 851.92, 851.91, 161.

EXHIBIT 18 B

(FABRICATED BY BRYAN PEASE "NOTICE OF VIOLATION" WHICHN IS NOT TRUE NOTICE BUT TAMPERED WITH "NOTIC

Exhibit 4 is Tampered with and maliciously misrepresented by Bryn Pease "Notice of Violation"

EXHIBIT 19

(MALICIOUS KNOWIGNLY FALSE POSTS BY BRYAN PEASE ABOUT ALLA ZORIKOVA AND HER DAUGHTER)

EXHIBIT 20

(MALICIOUS KNOWIGNLY FALSE POSTS BY BRYAN PEASE ABOUT ALLA ZORIKOVA AND HER DAUGHTER)

EXHIBIT 21

(MALICIOUS KNOWIGNLY FALSE POSTS BY BRYAN PEASE ABOUT ALLA ZORIKOVA AND HER DAUGHTER)

EXHIBIT 22

EXHIBIT 23

(9th Circuit Opinion Confirming “no charges filed against Alla Zorikova”)

Exhibit 3 is a true and correct copy of part of Opinion by 9th Circuit Court Affirming dismissal of Bryan Pease’s action on behalf of thieves of Zorikova’s dogs and against San Bernardino law enforcement searching for stolen Zorikova’s Dogs

EXHIBIT 24

(PEASE FABRICATES FALSE EVIDENCE, TAMPERING WITH OFFICIAL DOCUMENT)

EXHIBIT 25

(VERIFIED TRUE FACTS ABOUT BRYAN PEASE RADICAL)

EXHIBIT 26

(BRYAN PEASE IMPOSING ECONOMIC HARDSHIP AND DESTROYS ZORIKOVA’S BUSINESS BY KNOWINGLY FALSE MALICIOUS PUBLIC POSTS)

Oct 05, 2020 Pease implodes in his malicious campaign against victim of theft and victim of Bryan Pease, among of his hundreds of other similar victims, Alla Zorikova

Oct 05, 2020 Bryan Pease posts on that special created page of his website, his personal and APRL twitter account, his personal and APRL Facebook accounts knowingly false defamative malicious statements with the solo purpose to vilify victim of theft of her dogs Alla Zorikova while depriving her from ability to run her german shepherd business and those to deprive her from source of income.

EXHIBIT 27 a

(Another Unlawful Dissemination of Zorikova's Sealed Records in violation by Pease CA Penal Code 851.92, 851.91 and in Violation of CA Penal Code 161 of Court Order)

Bryan Pease's posts after Court Order prohibiting illegal dissemination had been issued

EXHIBIT 27 b

(Communication of Bryan Pease with Michael Wonder, who was charged by City Attorney in 2024 for sending to Alla Zorikova **DEATH THREATS**) Exhibit 1 is a true and correct copy of death threats sent by Bryan Pease's "buddy-conspirator" in 2023. Emails are screenshot from Alla Zorikova's email account stevejohn19732017@gmail.com that Ms Zorikova shares with multiple other business entities/persons

EXHIBIT 28

(CEASE AND DESIST NOTICES SENT BY ALLA ZORIKOVA TO BRYAN PEASE TO STOP PEASE'S HARASSING CRIMINAL ACTIONS TOWARDS ZORIKOVA)

Numerous repeated "CEASE and DESIST requests" sent by Alla Zorikova to Bryan in response for rape threats, offenses, harassment, cyberstalking

EXHIBIT 29

(PETITIONER ALLA ZORIKOVA WITH HER GERMAN SHEPHERD WIGO)

EXHIBIT 30

(ANOTHER STOP HARASSMENT REQUEST BY ALLA ZORIKOVA ADDRESSED TO DOCUMENTED HARASSER BRYAN PEASE)

Alla Zorikova sends numerous demand letters to Bryan Pease to refrain from, to cease and desist, to remove false statements from social media accounts of Bryan Pease, APRL, personal website

maintained by Bryan Pease, including unauthorized posts of likeness of Alla Zorikova.

CEASE and DESIST notices and request emailed and mailed to Bryan Pease by Alla Zorikova informing him that posted by him information upon Zorikova is false and requesting to remove posts.

EXHIBIT 31

(BRYAN PEASE'S COMMUNICATION WITH MICHAEL WONDER)

Exhibit 2 is a true and correct copy of emails that Michael Wonder sent from his email address to Alla Zorikova in 2023 (before Wonder was charged by City Attorney) to show communication between Wonder and Bryan Pease related to Alla Zorikova.

EXHIBIT 32

(KNOWINGLY FALSE STATEMENTS BY CASEY GISH UNDER PENALTY OF PERJURY)

EXHIBIT 33

(TRUE RANDOM EMAILS SENT IN REALITY
FOR THE WHOLE RANDOM MONTHS)

True and correct copy of real emails for the whole randomly selected months sent by ALL recipients as total from stevejohn19732017@gmail.com

Emails are nothing else but process service and notifications related to ongoing litigations.

Randomly selected month consist on average about 6-9 emails per month, totally

EXHIBIT 34

(DEATH THREATS BY MICHAEL WONDER UPON REQUEST BY BRYAN PEASE)

EXHIBIT 35

(Bryan Pease Vilifying and then DOXXING Alla Zorikova's Location to Impose her to Harm by 3rd Parties)

Exhibit S is a true and correct copy of Bryan Pease's Post presented in his declaration where Bryan Pease is doxing Alla Zorikova's location.

EXHIBIT 36

(Two of several "private investigators" reports from 2020 to 2024 after surveillance by Bryan Pease of Zorikova's vehicles, private properties, stalking, harassing, threatening with violence, trespassing property of Alla Zorikova)

Exhibit _W_ is a true and correct copy of TWO "private investigator" report presented by Gregory Tucker, who Pease hired to spy upon Zorikova's private property in Sept of 2024. (Pease keeping Alla Zorikova constantly under surveillance, escalating the tensivity of his spying activity upon Zorikova before Pease preparing the attack. First private investigator upon Zorikova's private property and her 18 years old daughter Olivia Pease conducted in Fall of 2020 and continued through present, 2024)

EXHIBIT 37

(Copy of Criminal Investigation Record opened by LAPD against Bryan Pease)

The true and correct copy of the LAPD criminal investigation report opened to investigate Bryan Pease's criminal dissemination of Zoirkova's sealed records in violation of CA Penal Codes 851.91, 851.92, violation of court order under CA Penal code 161, cyberstalking, harassment. I received the copy

of the investigation report data at the Hollywood department of LAPD on the same date when it was opened

EXHIBIT 38

The true and correct copy of emails Bryan sent to Alla on Nov 14 of 2024 (on the <u>exact date and after</u> Bryan just “obtained” his fraudulent “restraining order” in San Diego against Alla Zorikova without Zorikova’s knowledge.)

The true and correct copy of of emails Bryan sent to Alla on Nov 15 of 2024 (on the <u>exact date and before the TRIAL CALL</u> In defamation case Zorikova v Pease in San Diego.)

EXHIBIT 39

(Numerous repeated “CEASE and DESIST requests” sent by Alla Zorikova to Bryan in response for rape threats, offenses, harassment, cyberstalking)

EXHIBIT 40

(Report from web provider through which Bryan communicated with Zorikova. Report shows that initiation of communication had been done through “open search”)

Report from web provider through which Bryan communicated with Zorikova.

Report shows that initiation of communication had been done through “open search”

EXHIBIT 1

(Bryan Pease’s knowingly false declaration under penalty of perjury claiming “daily ongoing threats=communication by daughter of Zorikova)

CH-100 Request for Civil Harassment Restraining Orders

Read *Can a Civil Harassment Restraining Order Help Me?* (form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

Clerk stamps date here when form is filed

Electronically FILED by
Superior Court of California,
County of Los Angeles
9/23/2024 1:29 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By B. Lopez, Deputy Clerk

Assigned for all purposes to:
Commissioner Laura Cohen,
Department 5034

Fill in court name and street address:
**Superior Court of California, County of
Los Angeles**

Court fills in case number when form is filed.

Case Number:
24STRO06979

1 Person Seeking Protection

a. Your Full Name:
Bryan Pease, Esq. Age: 46
Your Lawyer (if you have one for this case)
Name: _____ State Bar No.: _____
Firm Name: _____

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.)
Address: 3960 W. Point Loma Blvd., Suite H-2562
City: San Diego State: CA Zip: 92110
Telephone: 619-723-0369 Fax: _____
Email Address: bryan@peaselaw.org

2 Person From Whom Protection Is Sought

Full Name: Olivia Dae Jeong Age: 23
Address (if known): unknown
City: Los Angeles State: CA Zip: _____

3 Additional Protected Persons

a. Are you asking for protection for any other family or household members? Yes No If yes, list them:
Full Name Gender Age Lives with you? How are they related to you?
Parisa Ijadi-Maghsoodi F 39 Yes No spouse

_____ Yes No _____
_____ Yes No _____
_____ Yes No _____

Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (Explain below):
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

This is not a Court Order.

Case Number: _____

4 Relationship of Parties

How do you know the person in (2)? (Explain below):
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.
I am an attorney representing fraud victims of Respondent in ongoing litigation

5 Venue

Why are you filing in this county? (Check all that apply):
a. The person in (2) lives in this county.

_____ Yes No
 _____ Yes No
 _____ Yes No

Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (Explain below):
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.

This is not a Court Order.

Case Number: _____

4 Relationship of Parties

How do you know the person in (2)? (Explain below):
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.
 I am an attorney representing fraud victims of Respondent in ongoing litigation

5 Venue

Why are you filing in this county? (Check all that apply):
 a. The person in (2) lives in this county.
 b. I was harassed by the person in (2) in this county.
 c. Other (specify): _____

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

Yes No (If yes, check each kind of case and indicate where and when each was filed.)

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(2) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody	_____	_____	_____
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Workplace Violence	_____	_____	_____
(9) <input type="checkbox"/> Small Claims	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input checked="" type="checkbox"/> Other (specify): Smith v. Jeong	Los Angeles	2024	24STCV04100

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? No Yes (If yes, attach a copy if you have one.)

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.
 (1) When did it happen? (provide date or estimated date): ongoing daily by email and phone
 (2) Who else was there?
Family members with whom Respondent has no connection nor reason to even know who they are, who Respondent nonetheless located and sent harassing and threatening messages to attacking my spouse and me, including my father-in-law, for no apparent reason

This is not a Court Order.

Case Number: _____

12 Request to Give Less Than Five Days' Notice of Hearing

You must have your papers personally served on the person in (2) at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.

13 No Fee for Filing or Service

- a. There should be no filing fee because the person in (2) has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. The sheriff or marshal should serve (notify) the person in (2) about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. There should be no filing fee and the sheriff or marshal should serve the person in (2) for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

14 Lawyer's Fees and Costs

I ask the court to order payment of my lawyer's fees Court costs.

The amounts requested are:

Item	Amount	Item	Amount
lawyer's fees	\$ TBD		\$
	\$		\$
	\$		\$

Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.



Case Number: _____

15 Possession and Protection of Animals

I ask the court to order the following:

- a. That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.
(Identify animals by, e.g., type, breed, name, color, sex.)

I request sole possession of the animals because (specify good cause for granting order):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.

- b. That the person in (2) must stay at least _____ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

16 Additional Orders Requested

I ask the court to make the following additional orders (specify):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested," for a title.

17 Number of pages attached to this form, if any: 21

Date: _____

Lawyer's name (if any)

Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: September 23, 2024

Bryan Pease, Esq.
Type or print your name

Sign your name

This is not a Court Order.

28 in-law, copying me and attacking my spouse and I, and stating to my father-in-law that he “might truly hate

1 USA and Caucasians,” referring to my spouse and I “placing a weak dog in baby stroller or stealing donated
2 child from another family,” telling me I should be “fucking real powerful and gorgeous woman,” and that I
3 “CHOOSE to serve Satan” (capitalization in original), stating she has a “line of another obsessed maniacs
4 who will not allow to see me hurt,” stating “you can’t simply leave the lawfare started,” stating “even Mom
5 from UK will not be able to help lol,” apparently referring to my mother-in-law, threatening to file a false
6 request for a restraining order against me and my co-counsel if we do not take down certain consumer
7 protection information from the Internet, stating “restraining pets in baby stroller is abusive,” and stating
8 that something “IRREVERSIBLE” is about to happen (emphasis in original).

9 7. I have never communicated with Jeong, and all of this communication is completely
10 unsolicited and unwanted. There is also no connection whatsoever between Jeong and my in-laws, and no
11 reason she should be contacting them or referring to them in emails to me.

12 8. Jeong also calls me constantly, such that I have had to block her number. I have never taken
13 one of these calls, nor have I ever called Jeong. She leaves voicemail messages telling me that I have to
14 send her a “cease and desist” if I want her to stop calling and emailing me.

15 9. Jeong continues to run a “protection dog” business, which has included training German
16 Shepherds to attack people. (*Zorikova v. Murcia*, Los Angeles Superior Court Case No. 23STCV13712.)

17 10. Jeong’s threats have become increasingly unhinged as she is losing her legal battles.

18 11. Jeong’s constant harassment serves no legitimate purpose and has caused me substantial
19 emotional distress, as it would any reasonable person.

20 12. Additionally, Jeong’s repeated and false accusations of violence and criminal activity
21 constitute a threat that Jeong will employ violence to pursue her extralegal ends—such as using her attack
22 dogs and henchmen to violently attack me or my family—and use these false accusations to justify it.
23 Accordingly, I ask the Court to waive filing fees and issue a TRO until this matter may be heard on notice.

24 13. It will be very difficult to locate and serve Jeong. The address she has listed for her
25 germanshepherddogslosangeles.com business, 5644 Park Oak Place, Los Angeles, is someone else’s
26 address that she is now prohibited from using, as confirmed in documents produced in the *Smith* case by the
27 owner of that address. She has also stolen the identity of another individual and listed her as the “CEO” of
28 her business with the Secretary of State (German Shepherd Dogs, LLC), and lists that persons address on

1 3. When San Bernardino County Animal Control refused to do its job and take the German
2 Shepherds in, Sheriff's deputies became concerned that they would be blamed for the dogs dying and so
3 called on community volunteers to rescue the dogs. Zorikova then began suing these volunteers for theft as
4 well as us attorneys over and over in different states as well as in federal court, which my co-counsel and I
5 have been defending pro bono and winning, which enrages Zorikova and Jeong. (*Zorikova v. Gregory*,
6 Nevada District Court Case No. A-20-820761; *Zorikova v. Vegas Shepherd Rescue*, Nevada District Court
7 Case No. A-20-821077; *Zorikova v. Pyle*, Nevada District Court Case No. A-20-821249; *Zorikova v.*
8 *Lamey*, San Bernardino Superior Court Case No. CIVDS2017383; *Zorikova v. Pease*, San Diego Superior
9 Court Case No. 37-2020-00036459; *Zorikova v. Gish*, U.S. Dist. Court Case No. 5:21cv1691; *Zorikova v.*
10 *Gregory*, Nevada District Court Case No. A-22-855742; *Zorikova v. Ward*, Nevada District Court Case No.
11 A-23-874626; *Zorikova v. Greiser*, San Bernardino Superior Court Case No. CIVSB2318134; *Zorikova v.*
12 *Pease*, San Diego Superior Court Case No. 37-2024-00002307; *Smith v. Zorikova*, Los Angeles Superior
13 Court Case No. 24STCV04100; *Zorikova v. Pease*, Los Angeles Superior Court Case No. 24STRO05768.)

14 4. Jeong and Zorikova have been harassing us and our clients nonstop since 2020, using the
15 same email address, stevejohn19732017@gmail.com, with a sender name of "Boris Stein," which is the
16 same email they both use for electronic filing and service in the various ongoing court cases. This is also the
17 email address they gave Sheriff's deputies upon their arrest as seen in Exhibit 1. They have also used
18 olivia.car@mail.ru. Their threats have escalated in particular this past week as they unsuccessfully
19 attempted to quash substituted service in the aforementioned consumer fraud case.

20 5. On September 17, 2024, Jeong filed a declaration in that case falsely accusing me of arson
21 and other crimes, which is concerning because Jeong appears to be setting up some kind of self-defense
22 argument for violent action she is planning.

23 6. Attached hereto as Exhibit 2 are true and correct copies of some of the harassing and
24 threatening emails I have received from Jeong over the years, including asking my co-counsel and I if we
25 are Jewish and therefore hate Germans, referring to my spouse and I as an "infertile couple" based on
26 pictures she apparently found on social media of us with our chihuahuas in a dog stroller, telling me I
27 should eat meat to increase "sexual activity" and to "think about before the wedding," emailing my father-
28 in-law, copying me and attacking my spouse and I, and stating to my father-in-law that he "might truly hate

EXHIBIT 2

(true and correct copies of random communication (if any))

by Olivia Jeong to Bryan Pease for extensive period of time)

← Search in mail

Sent From To Bryan Pease Attachm

Bryan Pease, You failed to answer formal int... ☆

me May 31
Olivia Jeong notice
Bryan Pease, Olivia Jeong had never receiv... ☆

me May 28
Responses due
Zorikova vs Pease Formal interrogatories re... ☆

me May 21
Intent to reinstate Appeal
Bryan Pease, I intended to move court of ap... ☆

me, Bryan 8, Draft May 20
Notice Depositions
Please don't attempt to instruct me... Inbox ☆

me May 20
Subpoena
Listen, Bryan Pease. Based on your last res... ☆

me May 20
Depositions
You will have to fly from New York, therefore... ☆


me May 20
Notice
Bryan Pease, Take notice that any and all of... ☆





← Search in mail

Sent From To Bryan Pease Attachn


 me Jun 16
Records forward to Smith
Justin Smith, Alla Zorikova's detention recor... ☆



 me Jun 14
Evidentiary hearing meet and confer
Bryan Pease, you requested to reply to this... ☆

 me Jun 14
Meet and confer
Bryan Pease, if you fail to meet and confer... ☆

 me Jun 5
Meet and confer
Bryan Pease, This is another attempt to res... ☆

 me Jun 1
(no subject)
Bryan Pease, I understood, you, person, exp... ☆

 me May 31
Reminder
Bryan Pease, you are acting as ProPer pers... ☆

 me May 31
Notice of intent
Bryan Pease, You failed to answer formal int... ☆

← Search in mail

Sent ▾

From ▾

To Bryan Pease ▾

Attachm

Wire fraud
Bryan Pease, receiving monetary donations... ☆

me Jun 20
Tracking
You both have been provided with multiple... ☆

me Jun 19
Meet and confer
Bryan Pease, It appears that you blocked m... ☆

Steve, me 2 Jun 18
demur
----- Forwarded message -----... Inbox ☆
 demurSmithAZ3 demurSmithAZ...

me 2 Jun 17
Meet and confer
Smith v Zorikova You shall contact me with... ☆

me Jun 16
Meet and confer Smith demurrer
Bryan Pease, I made multiple phone calls re... ☆

me Jun 16
Scope
Bryan Pease, If violation by Smith of 851.92 i... ☆

me Jun 16
Records forward to Smith

← Search in mail

Sent From To Bryan Pease Attachn

me Jul 26
Notice
I will file that unwelcomed letter with detecti... ☆

me Jul 26
Cease and desist
Pease, cease and desist any and all commu... ☆

B me, David, BARRY 5 Jul 11
Please forward in one email
To Pease as he was omitted on the r... Inbox ☆
PDF replyOppositDe...

me Jul 11
Barry
Joycelyne Lew just confirmed in writing that... ☆

me Jul 10
Smith v Zorikova
----- Forwarded message ----- Fr... ☆
PDF replyOppositDe...


me Jun 24
Wire fraud
Bryan Pease, receiving monetary donations... ☆

me Jun 20
Tracking

← Search in mail

Sent From To Bryan Pease Attachn

bryan Pease, I request you reply to this ema... ↩


 me Aug 3
Wiesand arrest in my case
Doesn't bring you to any goodness all the ti... ☆

 me Aug 2
Investigation
Bryan Pease, I submitted to detectives on y... ☆


 me Aug 2
Westside German Shepherd Rescue
<https://www.sheprescue.org/> Please, get bu... ☆

 me Aug 1
Wiesand
Listen, Pease, Wiesand had been in jail follo... ☆

 me Jul 27
Educational materials
I complaining upon you to law enforcement... ☆

 me Jul 27
Response on Letter Smith
Bryan Pease, listen, in this country officials... ☆

 me Jul 26
Notice
I will file that unwelcomed letter with detecti... ☆

 me Jul 26

← Search in mail

Sent From To Bryan Pease Attachn

Pease, offer to finish it all withdrawn, "stars... ☆

me Aug 12
Service POS
Service ☆
PDF POSparsonsCo...

me Aug 10
Meet and confer
Dear Bryan Pease, You have choice simply t... ☆

me Aug 4
Smith Notice POS
Justin Smith, You hereby requested to ceas... ☆

me Aug 4
Re: Notice
Bryan Pease, take notice that paraphrase "s... ☆

me Aug 4
Notice of lawsuit via counter complaint
Bryan Pease, Take notice that counter com... ☆

me Aug 3
Meet and confer Demurrer with Motion to S...
Bryan Pease, I request you reply to this ema... ☆

me Aug 3
Wiesand arrest in my case
Doesn't bring you to any address all the ti ☆

← Search in mail

Sent ▾

From ▾

To Bryan Pease ▾

Attachm



me

Aug 26

Lecture Zorikova vs Pease TRO URGENT

Bryan Pease, People are NOT interfere with...



me

Aug 26

Restraining order

Bryan Pease, Attached is a page #2 of the r...



Screenshot_202...



me

Aug 25

Dissemination of sealed records Jeong

Bryan Pease and Casey Gish, By California...



me

Aug 23

Notice

Bryan Pease, take notice that it's "you", not...



me

Aug 21

Notice , meet and confer

Bryan Pease, You don't have any judgement...



me

Aug 19

24STRO05768 RESTRAINING ORDER

Bryan Pease, Restraint order against you ha...



24STRO05768



me

Aug 19

Wiesand

Pease, Wiesand is officially deemed to be a...



Sent ▾

From ▾

To Bryan Pease ▾

Attachm



me

Aug 28

Cease and desist

Bryan Pease, You have been asked multiple... ☆



me

Aug 27

Zorikova vs Pease Notice Urgent

Bryan Pease, Just making sure you have the... ☆



Screenshot_202...



me

Aug 27

Discovery of Brian

Please explain why do you use Brian in legal... ☆



me

Aug 27

Meet and confer

Bryan Pease, Just briefly looking at the Los... ☆



me

Aug 26

Notice

Bryan Pease, Please notify that you are not... ☆



me

Aug 26

Meet and confer

Bryan Pease, i will move the court to deem... ☆



me

Aug 26

Lecture Zorikova vs Pease TRO URGENT

Bryan Pease, People are NOT interfere with... ☆



me

Aug 26

Restraining order

Bryan Pease, Attached is a page #2 of the r... ☆

← Search in mail

Sent From To Bryan Pease Attachm

Screenshot_202...

me Sep 10
Notice to abate
Bryan Pease, CA Penal Code 851.87 require... ☆

me Sep 4
Attached
Pease's another victim everyone needs to k... ☆

Screenshot_202...

me Sep 4
Pease's another victim everyone needs to k... ☆
Publishing this shortly and thinking about cl...

me Sep 4
Website updates, Notice Zorikova vs Pease... ☆
Bryan Pease, after i learned about another...

me Sep 3
Meet and confer
Bryan Pease, You are requested to reply to... ☆

me Sep 3
Notice of refiling
Bryan Pease, Denial of restraining order wa... ☆

me Aug 28
Cease and desist
▲

EXHIBIT 3

(true and correct copy of call history from Olivia Jeong's phone for extensive amount of time.

There is NO a single phone area code that would starts from (619) – Bryan's phone number)



Account: 773653726-00001
 Invoice: 9983479948
 Billing period: Jul 9 - Aug 8, 2024

Talk activity (cont.)



323-854-9167
 Google Pixel 7 Pro

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges Total
Jul 17	12:00 PM	213-████████	Los Angele, CA	████████	1	--	--
Jul 17	1:55 PM	949-████████	Los Angele, CA	████████	4	--	--
Jul 17	2:03 PM	949-████████	Los Angele, CA	████████	1	--	--
Jul 17	2:38 PM	504-████████	Los Angele, CA	████████ A	1	--	--
Jul 17	2:39 PM	267-████████	Los Angele, CA	████████ A	1	--	--
Jul 17	3:45 PM	323-8████████	Los Angele, CA	████████	1	--	--
Jul 17	3:46 PM	805-8████████	Los Angele, CA	Oxnard, CA	1	--	--
Jul 17	3:49 PM	805-████████	Los Angele, CA	Oxnard, CA	2	--	--
Jul 18	9:24 AM	313-████████	Trabuco CA, CA	████████	1	--	--
Jul 18	11:41 AM	213-████████	Corona, CA	Losangeles, CA	2	--	--
Jul 18	11:42 AM	7791-████████	Corona, CA	Losangeles, CA	1	--	--
Jul 18	12:46 PM	308-47████████	Palm Sprin, CA	Lsan DA 14, CA	3	--	--
Jul 18	12:50 PM	866-████████	Desert Hot, CA	████████	4	--	--
Jul 18	12:54 PM	866-████████	Cathedral, CA	████████	2	--	--
Jul 18	12:56 PM	866-████████	Cathedral, CA	████████	6	--	--
Jul 18	1:07 PM	323-████████	Indio, CA	Lsan DA 14, CA	1	--	--
Jul 18	1:08 PM	323-████████	Indio, CA	Lsan DA 14, CA	2	--	--
Jul 18	1:10 PM	504-████████	Indio, CA	████████ A	2	--	--
Jul 18	1:12 PM	504-████████	Coachella, CA	████████ A	3	--	--
Jul 18	1:16 PM	504-████████	Coachella, CA	████████ A	1	--	--
Jul 18	1:29 PM	212-████████	Thermal, CA	N████████	1	--	--
Jul 18	1:31 PM	212-████████	Thermal, CA	N████████	1	--	--
Jul 18	4:58 PM	310-████████	████████	Cmtn Grdn, CA	1	--	--
Jul 18	5:49 PM	267-████████	████████	Ph████████	2	--	--
Jul 18	8:18 PM	818-404-████████	████████	No Hollywd, CA	2	--	--
Jul 19	7:43 AM	AM213-████████	████████ M	Lsan DA 01, CA	6	--	--
Jul 19	7:48 AM	AM213-████████	████████ M	Lsan DA 01, CA	1	--	--
Jul 19	8:20 AM	AM213-████████	████████ M	Lsan DA 01, CA	1	--	--
Jul 19	9:58 AM	AM661-████████	████████	████████	1	--	--
Jul 19	1:09 PM	818-████████	████████	████████	1	--	--
Jul 19	2:26 PM	PM650-████████	████████	████████	2	--	--
Jul 19	7:01 PM	213-████████	████████	Lsan DA 01, CA	1	--	--
Jul 19	7:02 PM	213-████████	████████	Lsan DA 01, CA	1	--	--
Jul 19	7:21 PM	915-████████	████████	████████	1	--	--
Jul 20	9:37 AM	AM562-████████	████████	████████	1	--	--
Jul 20	11:15 AM	AM138-████████	████████	Lsan DA 01, CA	1	--	--
Jul 20	11:37 AM	AM0701-████████	████████	████████	1	--	--
Jul 20	12:31 PM	PM2265-████████	████████	Lsan DA 13, CA	1	--	--
Jul 20	6:51-7:42	303-████████	████████	Losangeles, CA	3	--	--
Jul 20	9:15-6:51	789-████████	████████	Losangeles, CA	3	--	--
Jul 20	7:012	2:05-████████	████████	Incoming, CL	2	--	--
Jul 20	3:45 PM	213-████████	████████	████████	1	--	--
Jul 20	1:22 PM	0212-████████	████████	████████	4	--	--
Jul 20	1:58 PM	████████	████████	Lsan DA 14, CA	1	--	--
Jul 20	████████	████████	████████	Lsan DA 08, CA	4	--	--
Jul 20	2:13 PM	323-████████	████████	Lsan DA 08, CA	1	--	--
Jul 20	4:24 PM	PM313-████████	████████	████████	2	--	--
					1		

Talk activity (cont.)

323-854-9167
Google Pixel 7 Pro

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges Total
Jul	1:49 PM	323-	Los Angeles, CA	Lsan DA 13, CA	1	--	--
13	1:52 PM	915-	Los Angeles, CA		2	--	--
Jul	8:04 PM	313-	Los Angeles, CA		2	--	--
13	7:15 AM	323-	Los Angeles, CA	Lsan DA 13, CA	1	--	--
Jul	7:40 AM	323-	Los Angeles, CA	Lsan DA 13, CA	2	--	--
13	10:13 AM	323-	Los Angeles, CA	Lsan DA 13, CA	1	--	--
Jul	10:15 AM	323-	Los Angeles, CA	Lsan DA 13, CA	1	--	--
14	10:20 AM	323-	Los Angeles, CA	Lsan DA 13, CA	2	--	--
Jul	12:18 PM	504-	Hollywood, CA		2	--	--
14	12:34 PM	323-	Los Angeles, CA	Lsan DA 13, CA	1	--	--
Jul	12:57 PM	504-	Los Angeles, CA		2	--	--
14	1:29 PM	313-	Los Angeles, CA		5	--	--
Jul	4:05 PM	202-	Los Angeles, CA		1	--	--
14	4:06 PM	313-	Los Angeles, CA		2	--	--
Jul	4:11 PM	323-	Los Angeles, CA		1	--	--
14	4:38 PM	323-	Los Angeles, CA		2	--	--
Jul	7:41 PM	504-	Los Angeles, CA		11	--	--
14	7:51 PM	626-	Los Angeles, CA		1	--	--
Jul	11:02 AM	310-	Los Angeles, CA		1	--	--
14	11:03 AM	310-	West Holly, CA		1	--	--
Jul	11:08 AM	504-	Los Angeles, CA		29	--	--
14	9:35 AM	866-	Los Angeles, CA		9	--	--
Jul	10:35 AM	424-	Los Angeles, CA	Beverlyhls, CA	7	--	--
14	10:49 AM	909-	Los Angeles, CA		9	--	--
Jul	11:50 AM	504-	Los Angeles, CA		1	--	--
14	1:51 PM	866-	Los Angeles, CA		17	--	--
Jul	2:24 PM	504-	Los Angeles, CA		7	--	--
14	2:31 PM	805-	Los Angeles, CA	Oxnard, CA	1	--	--
Jul	5:39 PM	915-	Hollywood, CA		1	--	--
14	5:50 PM	915-	Los Angeles, CA		1	--	--
Jul	6:33 PM	915-	Hollywood, CA		2	--	--
14	6:37 PM	267-	Los Angeles, CA		9	--	--
Jul	6:46 PM	267-	Los Angeles, CA		9	--	--
14	7:08 PM	915-	Los Angeles, CA		39	--	--
Jul	1:07 AM	737-	Los Angeles, CA		1	--	--
14	8:28 AM	943-34	San Bernar, CA		1	--	--
Jul	10:21 AM	213-	Rialto, CA	Losangeles, CA	5	--	--
15	10:37 AM	213-	Rancho Cuc, CA		1	--	--
Jul	10:39 AM	213-	Rancho Cuc, CA		5	--	--
15	10:43 AM	213-	Rancho Cuc, CA		1	--	--
Jul	10:45 AM	213-	Ranchocuca,		2	--	--
15	10:47 AM	213-	CA Rancho		8	--	--
Jul	10:55 AM	213-	Cuc, CA LA	Losangeles, CA	3	--	--

323-854-9167
Google Pixel 7 Pro

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges Total
Jul	11:47 AM	805-		Oxnard, CA	1	--	--
9	11:56 AM	915-			1	--	--
Jul	12:28 PM	202-			1	--	--
9	6:51 PM	626-			1	--	--
Jul	7:24 PM	775-			2	--	--
9	7:34 PM	626-			1	--	--
Jul	7:54 PM	760-		Victorvl, CA	2	--	--
9	10:23 PM	760-		Victorvl, CA	2	--	--
Jul	10:38 PM	760-			5	--	--
9	11:33 PM	626-			1	--	--
Jul	11:35 AM	909-		S Bernardino, CA	5	--	--
10	11:44 AM	909-		S Bernardino, CA	48	--	--
Jul	11:51 AM	760-		Victorvl, CA	2	--	--
10	11:59 AM	760-		Victorvl, CA	1	--	--
Jul	12:00 PM	213-		Lsan DA 01, CA	20	--	--
10	12:46 PM	915-			3	--	--
Jul	12:50 PM	775-			4	--	--
10	1:07 PM	760-		Victorvl, CA	1	--	--
Jul	1:44 PM	916-		Victorvl, CA	1	--	--
10	1:56 PM	265-			3	--	--
Jul	2:06 PM	5784-			2	--	--
10	2:07 PM	9246-			2	--	--

EXHIBIT 4

(true copies of emails sent by extensive amount of time)

Reconsidering
Sorry, it will be motion for reconsideration Z... ☆

me 8/3/2023
Rehearing
Please and Gish, this is second attempt to s... ☆

me 8/3/2023
Orders
It was 2 minute orders. Please, none of your... ☆

me 8/2/2023
Meet and confer
Motion for rehearing. Contact me over the... ☆

me 7/29/2023
Another fraud
Bryan Pease, The envelope in which you dro... ☆

Screenshot_202...

me, Mail 6 7/28/2023
Notice of lawsuit
Notice of lawsuit and Demand Letter... Inbox ☆

me 7/26/2023
Thought
Smart Gish, after you seeing us making har... ☆

me 7/25/2023
Notice of lawsuit
Notice of the Lawsuit and Demand Letter C... ☆

me 7/25/2023
Head
Gish, genetics produce not only different ab... ☆

Attachment

Older than a year

Is unread



me

10/2/2023

verdict zorikova v lamey
Proof of service will be amended, disregard... ☆

PDF generalVerdict



me

10/2/2023

joint witness list amended zorikova v lamey
(no body) ☆

PDF jointWitnessList...



me

10/2/2023

zorikova v lamey Exhibits
(no body) ☆

PDF jointExhibitsLis... ExhibitsTrialLa...



me

9/28/2023

zorikova v pease
attached complaint ☆



me

9/26/2023

exParte Notice
Zorikova v Gregory Attached by: Olivia Jeong ☆



extTimeServ... extTimeServ... +2

9/26/2023

to Appear on Trial ☆

Share, Edit, and Capture more buttons

← Search in mail

Attachment ▾

Older than a year ▾

Is unread

Results in mail



me 2

11/29/2023

DA

Wondering how much cleaner at supreme c... ☆



me

11/29/2023

Supplemental exhibit
(no body)



Screenshot_202...



me

11/27/2023

Meet and Confer and Joint exhibits witness...
Pease and Gish, You need to contact me via... ☆



me

11/22/2023

Subpoena
Zorikova vs Lamey Olivia Jeong ☆

Screenshot_... Screenshot_... +1



me

11/18/2023

Notice to appear
Notice to Tina Lamey to appear on trial on... ☆



me

11/15/2023

Proposed judgement
Pease and Gish, proposed judgement and... ☆



me

11/12/2023

Penalties

Attachment Older than a year Is unread

Please and Gish, be advised that in Motion f...



me 11/8/2022

Zorikova vs Lamey
Please and Gish, You had violated the Court...



me 10/26/2022

Defamation case
Pease, be advised that compensatory dama...



me 10/7/2022

Zorikova vs Lamey
Great Jon gathering all that info in Exhibit 5...



me 10/7/2022

Supplemental production
Zorikova vs Lamey Supplemental evidence,...



me 10/6/2022

Zorikova vs Lamey
Affidavit and Show Case toward contempt fi...



me 10/6/2022

Zorikova vs Lamey
Pease and Gish, Order has been issued and...



me 9/1/2022

Zorikova police report
Pease and Gish, In Zorikova v Lamey case l...



me 8/30/2022

Transcripts
Pease, I have transcripts 06/21/22 with your...



← Search in mail

Attachment ▾

Older than a year ▾

Is unread



me

1/9/2023

Zorikova vs Pyle reopen

Gish, this is a good faith attempt to resolve...



me

1/8/2023

Zorikova vs Gregory

Gish, this is 3rd meet and confer attempt to...



me ... , Mail 8, Drafts (2)

12/22/2022

A-22-855742

See attached Ms Jeong

Inbox



feeWaiver2022...

feeWaiver2022...



me

12/19/2022

zorikova vs pyle

Regards, Olivia Jeong



motionStayRemi...



me

12/2/2022

Zorikova vs Gregory Service

see attached



motionWithd...

ProofOfServi... +1



me

11/29/2022

Zorikova vs Gregory

Gish, after careful consideration i decided t...



me

11/29/2022

Zorikova vs Gregory

EXHIBIT 5

(Notice of Violation of Residential Code)



Land Use Services Department Code Enforcement **NOTICE OF VIOLATION**

ZINAIDA, DMITREEVA ETAL OR
TO: JEONG, OLIVIA NOTICE DATE: **10/13/2020**
ASSESSOR'S PARCEL NUMBER: 0502-085-75-0000 CASE #: **C202002475**
SITUS ADDRESS: 1335 TRUMP BLVD BARSTOW CA 92311
MAILING ADDRESS: [REDACTED]

THE INDICATED VIOLATION(S) OF THE INTERNATIONAL PROPERTY MAINTENANCE CODE AND/OR THE SAN BERNARDINO COUNTY CODE WERE OBSERVED ON THE SUBJECT PROPERTY DURING AN INSPECTION CONDUCTED ON 10/02/2020:

- IPMC 302.8 - **Motor Vehicles:** No inoperative motor vehicle shall be parked, kept, or stored on any premises other than in a garage.
Corrective Action: _____
- IPMC 108.1.4 - **Unlawful Structures:** An unlawful structure that was erected, altered, or occupied contrary to law.
 Room Addition Garage Conversion Patio Cover Decking Carport Residence / Manufactured Shed-Cargo Container-Barn-Animal Enclosure
Corrective Action: _____
- IPMC 108.1.5(7) - **Dangerous Structure on Premises:** The building or structure is neglected, damaged, dilapidated, unsecured, abandoned, or an attractive nuisance.
Corrective Action: _____
- IPMC 102.2 - **Maintenance:** Structure or premises shall be maintained in good working order.
Corrective Action: _____
- IPMC 302.7 - **Accessory Structures:** Accessory structures, including detached garages, fences and walls, shall be maintained, structurally sound, and in good repair.
Corrective Action: _____
- IPMC 308.1 - **Garbage:** Exterior and interior of property shall be free from any accumulation of rubbish or garbage.
Corrective Action: _____
- IPMC 504.1 - **Plumbing Systems and Fixtures:** Plumbing fixtures shall be properly installed and maintained in working order.
Corrective Action: _____
- IPMC 506.1 - **Sanitary Drainage:** Plumbing fixtures shall be properly connected to either a public sewer system or an approved private sewage disposal system.
Corrective Action: _____
- IPMC 602.2 - **Heating Facilities:** Dwellings shall be provided with heating facilities.
Corrective Action: _____
- SBCC 41.2503 - **Rental Dwelling Unit License Required:** A license is required for the operation of each rental dwelling unit.
Corrective Action: _____
- SBCC 84.25.070 A & C - **Occupancy/Camping:** It is unlawful to temporarily or permanently occupy any vehicle or temporary structure.
Corrective Action: _____
- SBCC 84.04.090(h) - **Animal Density Standards:** The number of animals shall be within approved limits.
Corrective Action: _____
- SBCC 82.02.020(b) **No Primary Use - Vacant**
Corrective Action: Operating a kennel on a property listed as vacant with no established Primary Use is not allowed. Remove 2 sheds, personal items, vehicles, dogs and makeshift animal enclosures.

The indicated violations must be corrected within **30** days from the date of this notice. A re-inspection of this property to verify compliance will be completed after 11/12/2020. Failure to correct the existing violation(s) may result in the issuance of administrative citations and/or civil or criminal prosecution. A lien and a special assessment on the property tax roll may also be placed against the subject property to recover any regulatory costs incurred by the County.

If you have questions regarding this notice please contact Code Enforcement at (909) 884-4056 or (760) 995-8140.

Notice received by: Standard Mail Code Enforcement Officer: G. Arroyo

08/31/2020: Referral received from T. Campos with veterinary services. Kennel operating on vacant parcel, POs living in tents and make shift storage units built on the parcel. On 8/8/2020 SBCSD found approx. 50 German Shepherds on the property, unclear how many dogs remain as of today. There also a lot of discarded meat that is picked up daily from the Barstow butcher and uses to feed the dogs. Per T. Campos PO has filed a lawsuit against the SBCSD. Photos taken by T. Campos saved to office links. E. Aguero

PROPERTY OWNER CONTACT

09/08/2020 Ella [REDACTED] called and would like a call back to know how to go about getting a kennel permit. P. Harris

PROPERTY OWNER CONTACT

09/09/2020: Ella, [REDACTED] would like to schedule the initial inspection on the property. She also stated that the meat on the property is used for composting. E. Aguero

FIELD INVESTIGATION

10/02/2020 Field investigation conducted at front fence with property owner Ella Zorikova. Ms. Zorikova did not consent to the investigation and all pictures were taken from the public right of way. Ms. Zorikova stated that she only stays on the property when dogs are present. There are 2 shed located on the property with one being metal and one wood Due to no consent to enter property i observed approximately 13 dogs present on the property in individual makeshift cages with tarp being used to shade dogs. 2 Sports utility vehicles were parked at the entrance of the property. Unable to determine if any disposed meat was present on the property.

Ms. Zorikova stated that she has attempted to obtain a kennel permit and I explained to her I was there to investigate the Land use Violation since the property is listed as vacant with no primary use. Ms. Zorikova stated she will attempt to get the kennel permit and if she cannot obtain permit she will leave the property. I explained to Ms. Zorikova that she must talk to planning. I gave Ms. Zorikova my business card and informed her I would be sending a notice. Ms. Zorikova provided me with an address to send notice to and asked any future communication to be with her attorney. I replied that is fine, but her attorney would need to contact Code enforcement and we will not reach out to them and it is her responsibility to keep her attorney informed not ours. Ms. Zorikova understood. Notice will be sent to address on file and also to address provided by Ms. Zorikova. [REDACTED]

G. Arroyo

NOTICE OF VIOLATION

Notice prepared on 10/07/2020 with a mail date of 10/13/2020. 30 day notice will be issued for the following violation: SBCC 82.02.020(b) No Primary Use - Vacant. Notice has been saved to office link and email has been sent to operations for regular mailing. G. Arroyo

NOTICE OF VIOLATION - MAILING:

10/13/2020: Notice of Violation mailed regular status with pictures and scanned to case file. Mailed to: [REDACTED]. N. Candelario

NOTICE OF VIOLATION - MAILING:

10/13/2020: Notice of Violation mailed regular status with pictures and scanned to case file. Mailed to: [REDACTED]. N. Candelario

EXHIBIT 6

(Court Order to Deem Alla Zorikova's Detention Never Occurred and to Seal False Arrest Records, providing CA Penal Code's penalty for Violation of Such Order)

CR-410 Order to Seal Arrest and Related Records (Pen. Code, §§ 851.91, 851.92)

Clerk stamps date here when form is filed.

1 Name: Zorikva Alla A
Last First Middle
 Mailing address: 5644 Park Oak Place
Street
Los Angeles CA 90068
City State Zip

FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF SAN BERNARDINO
 VICTORVILLE DISTRICT
 SEP 06 2023
 BY Lizette Flores
 LIZETTE FLORES DEPUTY

2 The court finds that the petitioner is eligible for the following requested relief and makes the following order:

The court GRANTS the petition. The record of arrest in the following matter shall be sealed under the provisions of section 851.91, and the arrest deemed not to have occurred:

Law enforcement agency report number: 082001029

Prosecuting agency report number: _____

Court case number: _____

Other: _____

Petitioner may answer any question relating to the sealed arrest as though it did not happen, and petitioner is released from all penalties and disabilities resulting from the arrest, except as follows:

- The sealed arrest may be pleaded and proved in any later prosecution of the petitioner for any other offense, and will have the same effect as if it had not been sealed.
- The sealing of an arrest under section 851.91 does not relieve the petitioner of the obligation to disclose the arrest, if otherwise required by law, in response to any direct question contained in a questionnaire or application for public office, for employment as a peace officer, for licensure by any state or local agency, or for contracting with the California State Lottery Commission.
- The sealing of an arrest under this section does not affect petitioner's authorization to own, possess, or have in his or her custody or control any firearm, or his or her susceptibility to conviction under Chapter 2 (commencing with section 29800) of Division 9 of Title 4 of Part 6, if the arrest would otherwise affect this authorization or susceptibility.
- The sealing of an arrest under this section does not affect any prohibition from holding public office that would otherwise apply under law as a result of the arrest.

Clerk fills in the name and street address of the court.

Superior Court of California, County of
San Bernardino
14455 Civic Drive
Victorville, CA
92382

Clerk fills in the number and name of the case.

Trial Court Case Number:
23AD000300

Trial Court Case Name:
 People of the State of California
 v. ZORIKOVA

- 3 The court DENIES the petition (check one):
- The petition does not meet the requirements listed in Penal Code section 851.91(b)(1).
 - Petitioner's arrest does not qualify under Penal Code section 851.91(a).
 - The court finds that sealing the arrest would not serve the interests of justice under Penal Code section 851.91(c)(2).

d. Other: _____
 Date: 9/6/2023



Shannon L. Faherty
 Signature of Judicial Officer
 Shannon L. Faherty

This is a Court Order.

ZORIKOVA'S EXHIBIT 7


(Allegedly Fabricated by Bryan Pease "Vet Report" presented by Pease's witness Justin Smith")

EXHIBIT HD

Garden Grove Dog & Cat Hospital

10822 Garden Grove Blvd.
Garden Grove, CA 92843
(Fax) 714-537-6012 ggpthospital.com
Tel: 714-537-8800

Bill for Services
DATE 12/03/19 INV. NUM 564742

Michelle Vuong


Acct no.: 123539
Mark D. Maio, DVM

Qty	Date	Patient	Description	Price	Ext	Tx
1	12/3/2019	Madeline	PS025- Exam @ No Charge	\$0.00	\$0.00	
1	12/3/2019	Madeline	Xr4952- Xray Orthopedic (3 view)	\$226.25	\$226.25	
1	12/3/2019	Madeline	Hw1000- Hazardous Waste	\$7.25	\$7.25	
1	12/3/2019	Madeline	*Eye- Dr. Esson - VOC note	\$0.00	\$0.00	
1	12/3/2019	Madeline	IDX5013- Fecal (Idexx)	\$26.50	\$26.50	
1	12/3/2019	Madeline	RP5550- Missing Link K9 + Joint Suppor	\$38.00	\$38.00	tx

Subtotal \$298.00

Tax \$3.33

Bill total \$301.33

Prev balance \$0.00

Payment (\$301.33)

NEW BALANCE \$0.00

Pmnt 1: Visa Amt: (\$301.33)
Note: Visa jb 3865

Pmnt 2: Amt: \$0.00
Note:

Thank you for choosing Garden Grove Dog and Cat Hospital for your pets health care needs. Your confidence in us is appreciated. If you have any questions or concerns regarding your pet please call 714-537-8800.

We appreciate your comments. See the Client Satisfaction Survey on our website at ggpthospital.com Garden Grove Dog and Cat Hospital is a full service veterinary clinic, but is not a 24 hour facility. The continuous presence of professional personnel may not be provided after our regular business hours.

Signs that may indicate PAIN in your pet:

NORMAL- NO PAIN - Asleep or interested in surroundings, Comfortable, Quiet, Normal heart rate/ respiration

EXHIBIT HE

Michelle Vuong



Client ID: 4469
Invoice #: 47667
Date: 5/3/2021

Patient ID: 9628	Weight: 51.50 pounds
Patient Name: Whiskey	Birthday: 11/04/2020
Species: Canine	Sex: Male
Breed: Shepherd, German	

	<u>Description</u>	<u>Staff Name</u>	<u>Quantity</u>	<u>Total</u>
5/3/2021	24639 IDEXX Fecal Panel Comprehensive	Dr. Dr. Ash	1.00	\$51.98
	Thank you for visiting UVC!		1.00	\$0.00
		Patient Subtotal:		\$51.98

Reminder

04/05/2022 Exam & Office Visit (Wellness)

Patient ID: 9627	Weight: 23.00 pounds
Patient Name: Coconut	Birthday: 11/15/2018
Species: Canine	Sex: Female
Breed: Bulldog, French	

	<u>Description</u>	<u>Staff Name</u>	<u>Quantity</u>	<u>Total</u>
5/3/2021	24639 IDEXX Fecal Panel Comprehensive	Dr. Dr. Ash	1.00	\$51.98
	Thank you for visiting UVC!		1.00	\$0.00
		Patient Subtotal:		\$51.98

Reminder

03/15/2022 Canine DAPPv 1 year
Exam & Office Visit (Wellness)
Bordetella Vaccine Intranasal 1 year

Invoice Total:	\$103.96
Total:	\$103.96
Balance Due:	\$103.96
Previous Balance:	\$0.00
Balance Due:	\$103.96
Visa:	(\$103.96)
Less Payment:	(\$103.96)
Balance Due:	\$0.00

Scheduled Appointments:

Appt. for Madeline on 5/10/2021 at 02:30 pm.
Appt. for Coconut on 6/7/2021 at 09:30 am.
Appt. for Madeline on 6/11/2021 at 03:00 pm.
Appt. for Coconut on 6/15/2021 at 09:00 am.

Our doctors and staff thank you for choosing our Hospital. We appreciate your business and enjoy providing care for your pets. Thank You.

APP214

000032

EXHIBIT HF



University Veterinary Center

www.UVCVET.com
1716 West Glenoaks Avenue
Anaheim, CA 92801
(714) 551-9911

Michelle Vuono



Client ID: 4469

Invoice #: 47835

Date: 5/6/2021

Patient ID:	9628	Weight:	65.00 pounds
Patient Name:	Whiskey	Birthday:	11/04/2020
Species:	Canine	Sex:	Male
Breed:	Shepherd, German		

	<u>Description</u>	<u>Staff Name</u>	<u>Quantity</u>	<u>Total</u>
5/5/2021	Panacur Granules 22.2% (50-75#)	Dr. Dr. Ash	2.00	\$70.00
5/6/2021	910 IDEXX Urinalysis		1.00	\$53.70
5/5/2021	Fecal Cup To Go Home w/ Client		1.00	\$0.00
5/6/2021	Thank you for visiting UVC!		1.00	\$0.00
		Patient Subtotal:		\$123.70

Reminder

04/05/2022 Exam & Office Visit (Wellness)

Invoice Total:	\$123.70
Total:	\$123.70
Balance Due:	\$123.70
Previous Balance:	\$0.00
Balance Due:	\$123.70
Visa:	(\$123.70)
Less Payment:	(\$123.70)
Balance Due:	\$0.00

Scheduled Appointments:

- Appt. for Madeline on 5/10/2021 at 02:30 pm.
- Appt. for Coconut on 6/7/2021 at 09:30 am.
- Appt. for Madeline on 6/11/2021 at 03:00 pm.
- Appt. for Coconut on 6/15/2021 at 09:00 am.
- Appt. for Coconut on 6/15/2021 at 12:00 pm.

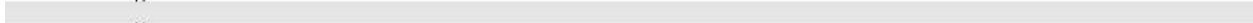
Our doctors and staff thank you for choosing our Hospital. We appreciate your business and enjoy providing care for your pets. Thank You.

EXHIBIT HG

27

28

DECLARATION OF JUSTIN SMITH APP186



1

2

Table of Exhibits

3

Exhibit 1: Sales Agreement (Von Schutz German Shepherds Purchase Contract)..... 7

4

Exhibit 2: Veterinary Bills 11

5

Exhibit 3: Veterinary Bill Summary 39

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Item	Date	Reason	Cost
1	02/21/21	Initial visit, Vaccinations Blood test 1 , UTI test 1, Fecal test 1 Frequent urination and diarrhea	\$ 458.00
2	02/22/21	Urine culture 1: due to extreme case of UTI Medication for UTI	\$ 207.25
3	02/22/21	Lab results was very abnormal, indication of very unhealthy puppy (items in red)	-
4	04/05/21	Blood test 2, UTI test 2, Fecal test 2 Frequent urination has not stopped and stool still runny	\$ 270.20
5	04/06/21	Lab results show still positive with UTI and positive 2 parasites and blood work abnormal (has anemia and many other issues)	-
6	04/08/21	Urine culture 2: due to extreme UTI Medication for UTI and parasite	\$ 271.88
7	04/10/21	Lab results for culture	-
8	04/24/21	Supplement for joint health due to likelihood of hip dysplasia	\$ 65.00
9	05/03/21	Fecal test 3: Follow-up test for parasite	\$ 51.98
10	05/02/21	Lab results show still positive with 1 of 2 parasites	-
11	05/06/21	UTI test 3: Follow-up retest Medicaion for parasite	\$ 123.70
12	05/08/21	Lab results show UTI has worsened with different bacteria	-
13	05/08/21	Urine culture 3: Worsened UTI	TBD
14	TBD	Medication for UTI	TBD
15	05/08/21	Supplement for joint health due to likelihood of hip dysplasia	\$ 80.00
	TBD	Blood test 3, UTI test 4, Fecal test 4, Medications, Xray: Anticipated follow-up tests due to abnormal symptoms of puppy. Vet has indicated this is extremely abnormal, as the puppy should have been cleared of UTI and parasites by now.	TBD
			<hr/> \$ 1,528.01

APP221

000039

ZORIKOVA'S EXHIBIT 8

(Casey's Gish Knowingly false Declaration followed by clear and convincing tangible evidences of falsity)

1 **PEASE LAW, APC**
2 Bryan W. Pease, Esq. (SBN 239139)
3 3960 W. Point Loma Blvd., Suite H-2562
4 San Diego, CA 92110
5 Phone 619-723-0369
6 E-mail: bryan@peaselaw.org

7 **LAW OFFICES OF CASEY D. GISH**
8 Casey D. Gish, Esq. (SBN 206289)
9 5940 S. Rainbow Blvd.
10 Las Vegas, NV 89118
11 Ph. (702) 583-5883
12 E-mail: casey@gishlawfirm.com

13 **LAW OFFICES OF G. DAVID TENENBAUM**
14 G. David Tenenbaum (SBN 150629)
15 269 S. Beverly Drive #1041
16 Beverly Hills, CA 90212
17 Ph. (312) 404-7723
18 E-mail: g.davidtenenbaum@gmail.com

19 Attorneys for Defendant and Cross-Complainants

20 **SUPERIOR COURT OF CALIFORNIA**

21 **COUNTY OF SAN DIEGO**

22 ALLA ZORIKOVA,)
23 Plaintiff,) CASE NO. 37-2020-00036459-CU-DF-CTL
24 vs.) **DECLARATION OF ATTORNEY**
25 BRYAN PEASE,) **CASEY GISH IN SUPPORT OF EX**
26 Defendant,) **PARTE APPLICATION**
27)
28 TINA LAMEY, ANTONETTA MASON, and)
29 BRYAN PEASE,)
30 Cross-Complainants,)
31 vs.)
32 ALLA ZORIKOVA; OLIVIA JEONG;)
33 DMITREEVA ZINAIDA; URID SEMENIKIN;)
34 VON MARKGRAF GERMAN SHEPHERDS;)
35 and DOES 1-25,)
36 Cross-Defendants.)

1 I, Casey Gish, Esq., declare:

2 1. I am an attorney licensed to practice before all California courts and am attorney for
3 cross-complainant Tina Lamey in the above-captioned action. I state the following of my own personal
4 knowledge.

5 2. I am representing Tina Lamey pro bono in this case and other cases involving Cross-
6 Defendants Zorikova and Jeong, who send me dozens of harassing emails every week and have done so
7 for the past three years that this litigation has been pending. Their behavior escalates when there are
8 hearings or pleadings pending. Both use the same email address, stevejohn19732017@gmail.com, which
9 is the email address they list in their pleadings.

10 3. On February 28, 2022 at 6:10 a.m., while multiple pleadings and hearings were pending,
11 Zorikova sent me an email stating that her father was a Russian oligarch, and stating, "You back off,
12 Gish, it will not go good for you, no your tactics designated for sneaking in frauds going to stand here.
13 You digged dip [sic] enough hole in sand, get out there while maybe possible." A true and correct copy
14 of this email is attached to the Pease Declaration as Exhibit 4.

15 4. About an hour later, Zorikova sent me an email stating, "Where is Olivia?" This was a
16 reference to my then 5-year-old daughter. She stated nothing else in the email, a true and correct copy of
17 which is also attached to the Pease Declaration as Exhibit 4.

18 5. Other emails Zorikova and Jeong have sent to both co-counsel and myself are also
19 attached to the Pease Declaration. Zorikova and Jeong have repeatedly accused us of blackmailing
20 judges, "organ harvesting," and other bizarre allegations. If Zorikova and Jeong are not immediately
21 enjoined from contacting or referring to family members of counsel in this case, it will negatively
22 impact my ability to effectively represent my client and will thereby cause irreparable harm.

23

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

25

26 Dated: October 8, 2023

By: 
Casey Gish, Esq.

27

28

REAL EMAILS RANDOMLY TAKEN from Zorikova's phone/emails
TO PROVE PERJURY BY CASEY DYLAN GISH



me

9/2/2023

Moore

It was T Ward on that picture, Pease, just sa...

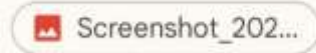


me

8/26/2023

Screenshot (Aug 26, 2023 10:32:00 PM)

2023 new law clarifying grand theft of pet, j...

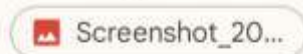


me

8/25/2023

Attempted cross complaint

See attached rules under which all your cha...



me

8/3/2023

Reconsidering

Sorry, it will be motion for reconsideration Z...



me

8/3/2023

Rehearing

Please and Gish, this is second attempt to s...



me

8/3/2023

Orders

It was 2 minute orders. Please, none of your...



me

8/2/2023

Meet and confer

Motion for rehearing. Contact me over the...



me

7/29/2023

Another fraud

Bryan Pease, The envelope in which you dro...



Attachment Older than a year Is unread

me 10/10/2023
Mason
Gish, there is no Mason in Zorikova vs Peas...

me 10/6/2023
Supplemental exhibits
Additional emails sent to Detectives are on...

me 10/6/2023
Supplemental exhibits
Zorikova vs Lamey Lamey's declaration fro...

me 10/4/2023
Supplemental exhibits
Zorikova vs Lamey Supplemental exhibit as...

me 10/2/2023
POS
(no body)
 POSLameyOppo...

me 10/2/2023
verdict zorikova v lamey
Proof of service will be amended, disregard...
 generalVerdict

me 10/2/2023
joint witness list amended zorikova v lamey
(no body)
 jointWitnessList...

me 9/11/2023
ex parte
zorikova v pease
 orderVict appExParte +4

me 2 9/11/2023
Order
Bryan Pease, see order attached requestin...
 PXL_20230911_1...

me 9/9/2023
Ex parte
Please and Gish, ex parte application will be...

me 9/2/2023
Moore
It was T Ward on that picture, Pease, just sa...

me 8/26/2023
Screenshot (Aug 26, 2023 10:32:00 PM)
2023 new law clarifying grand theft of pet, j...
 Screenshot_202...

me 8/25/2023
Attempted cross complaint
See attached rules under which all your cha...
 Screenshot_20... Screenshot_20...

me 8/3/2023
Reconsidering
Sorry, it will be motion for reconsideration Z...



me 9/2/2023
Moore
It was T Ward on that picture, Pease, just sa...

me 8/26/2023
Screenshot (Aug 26, 2023 10:32:00 PM)
2023 new law clarifying grand theft of pet, j...
 Screenshot_202...

me 8/25/2023
Attempted cross complaint
See attached rules under which all your cha...
 Screenshot_20... Screenshot_20...

me 8/3/2023
Reconsidering
Sorry, it will be motion for reconsideration Z...

me 8/3/2023
Rehearing
Please and Gish, this is second attempt to s...

me 8/3/2023
Orders
It was 2 minute orders. Please, none of your...

me 8/2/2023
Meet and confer
Motion for rehearing. Contact me over the...

me 7/29/2023
Another fraud
Bryan Pease, The envelope in which you dro...

Screenshot_202...



Notice of lawsuit Add label



Boris Stein 7/25/2023

to Casey



Notice of the Lawsuit and Demand Letter

Casey Gish, you are hereby notified that lawsuit for defamation, libel and possibly other causes of actions will be filed against you related to your knowingly false statements to the authorities occurred from 2021 to present based on the amendment taken place in 2021 that stripped privilege of such false statements.

Lawsuit will be filed unless you compensate damages in the amount of \$1,000,000 by August 15th of 2023.

Alla Zorikova



Reply



Reply all



Forward



Notice of lawsuit Add label



Boris Stein 7/25/2023

to Casey



Notice of the Lawsuit and Demand Letter

Casey Gish, you are hereby notified that lawsuit for defamation, libel and possibly other causes of actions will be filed against you related to your knowingly false statements to the authorities occurred from 2021 to present based on the amendment taken place in 2021 that stripped privilege of such false statements.

Lawsuit will be filed unless you compensate damages in the amount of \$1,000,000 by August 15th of 2023.

Alla Zorikova



Reply



Reply all



Forward



Warning

Add label



Boris Stein 6/21/2023

to Bryan, Casey







Pease and Gish, You and your buddies including ASPCA and other pasps required cease and desist any and all spams, code modification, unauthorized login and snooping to any and all my or my relatives websites.
I am trucking and documenting each instance of such activity with full log of ip addresses and location . Lawsuit will be filed for multiple causes
Alla Zorikova



Reply

Reply all

Forward

1:57    


5G   65%



Service Add label



Boris Stein 5/4/2023

to Bryan, Casey 



Pease and Gish, I am going take declarations of people and my own regarding you falsifying POS, particularly of the last your motions as judge made it clear that "officers of the court" will be in trouble for lying



Reply



Reply all



Forward

Attachment Older than a year Is unread

me 3/30/2023
Zorikova vs Lamey
Why you always saying to judge about som... ☆

me 3/30/2023
Join docs
Please be advised that if you fail to sign join... ☆

me 3/30/2023
Trial readiness
Please and Gish, I need you to cooperate, I... ☆

me 3/16/2023
Facts
Pease, I can't believe you inserted that bs a... ☆

me 3/13/2023
Motion to strike
Please and Gish, This is meet and confer att... ☆

me 3/6/2023
Money laundering
Gish, do you know that brave group of inves... ☆

me 2/24/2023
Meat protein
Pease, new science published undeniable f... ☆

me 2/21/2023
Objection
I am going object your letter, you better wit... ☆



← Search in mail

Attachment Older than a year Is unread

me 1/9/2023
Zorikova vs Pyle reopen
Gish, this is a good faith attempt to resolve... ☆

me 1/8/2023
Zorikova vs Gregory
Gish, this is 3rd meet and confer attempt to... ☆

me ... , Mail 8, Drafts (2) 12/22/2022
A-22-855742
See attached Ms Jeong Inbox ☆

me 12/19/2022
zorikova vs pyle
Regards, Olivia Jeong ☆

me 12/2/2022
Zorikova vs Gregory Service
see attached ☆
 +1

me 11/29/2022
Zorikova vs Gregory
Gish, after careful consideration i decided t... ☆

me 11/29/2022
Zorikova vs Gregory

Attachment Older than a year Is unread

Please and Gish, be advised that in Motion f...



me 11/8/2022

Zorikova vs Lamey
Please and Gish, You had violated the Court...



me 10/26/2022

Defamation case
Pease, be advised that compensatory dama...



me 10/7/2022

Zorikova vs Lamey
Great Jon gathering all that info in Exhibit 5...



me 10/7/2022

Supplemental production
Zorikova vs Lamey Supplemental evidence,...



me 10/6/2022

Zorikova vs Lamey
Affidavit and Show Case toward contempt fi...



me 10/6/2022

Zorikova vs Lamey
Pease and Gish, Order has been issued and...



me 9/1/2022

Zorikova police report
Pease and Gish, In Zorikova v Lamey case l...



me 8/30/2022

Transcripts
Pease, I have transcripts 06/21/22 with your...

Search in mail

Attachment Older than a year Is unread

Results in mail

- me 2 11/29/2023
DA
Wondering how much cleaner at supreme c...
- me 11/29/2023
Supplemental exhibit
(no body)
 Screenshot_202...
- me 11/27/2023
Meet and Confer and Joint exhibits witness...
Pease and Gish, You need to contact me via...
- me 11/22/2023
Subpoena
Zorikova vs Lamey Olivia Jeong
 Screenshot_... Screenshot_... +1
- me 11/18/2023
Notice to appear
Notice to Tina Lamey to appear on trial on...
- me 11/15/2023
Proposed judgement
Pease and Gish, proposed judgement and...
- me 11/12/2023
Resaltice

Attachment Older than a year Is unread

Security oppo...



me 10/2/2023

verdict zorikova v lamey
Proof of service will be amended, disregard... ☆

PDF generalVerdict



me 10/2/2023

joint witness list amended zorikova v lamey
(no body) ☆

PDF jointWitnessList...



me 10/2/2023

zorikova v lamey Exhibits
(no body) ☆

PDF jointExhibitsLis... ExhibitsTrialLa...



me 9/28/2023

zorikova v pease
attached complaint ☆



me 9/26/2023

exParte Notice
Zorikova v Gregory Attached by: Olivia Jeong ☆



extTimeServ... extTimeServ... +2

9/26/2023

to Appear on Trial ☆

[share icon] [edit icon] Capture more

Notice to Appear on Trial
Attached Zorikova v Lamey by: Olivia Jeong

noticeToAppear...

me 9/24/2023
first amended complaint Zorikova vs pease
(no body)

amendedCompl...

me 9/24/2023
Double agent
Impossible to believe that some of "Pease's...

me 9/23/2023
Statement
Bryan Pease, if you decide to move toward f...

me 9/23/2023
Demand additional Zorikova vs Pease
Bryan Pease, You have been provided multi...

me 9/23/2023
Supplemental exhibits Zorikova vs Lamey
Attached . So your Lamey provided 2 opposi...

Screenshot_... Screenshot_... +2

me 9/22/2023
Data
Be advised that I am far more advanced bas...

me 9/21/2023
Supplemental exhibits
Zorikova vs Lamey Attached Ms Zorikova

Screenshot_202...

Reconsidering
Sorry, it will be motion for reconsideration Z... ☆

me 8/3/2023
Rehearing
Please and Gish, this is second attempt to s... ☆

me 8/3/2023
Orders
It was 2 minute orders. Please, none of your... ☆

me 8/2/2023
Meet and confer
Motion for rehearing. Contact me over the... ☆

me 7/29/2023
Another fraud
Bryan Pease, The envelope in which you dro... ☆

Screenshot_202...

me, Mail 6 7/28/2023
Notice of lawsuit
Notice of lawsuit and Demand Letter... Inbox ☆

me 7/26/2023
Thought
Smart Gish, after you seeing us making har... ☆

me 7/25/2023
Notice of lawsuit
Notice of the Lawsuit and Demand Letter C... ☆

me 7/25/2023
Head
 Gish, genetics produce not only different ab... ☆

EXHIBIT 9

(trespassing and interfering with private property)

2:40

LTE 30%















7:33

LTE 55%

X (323) 854-9167
1 min

Edit

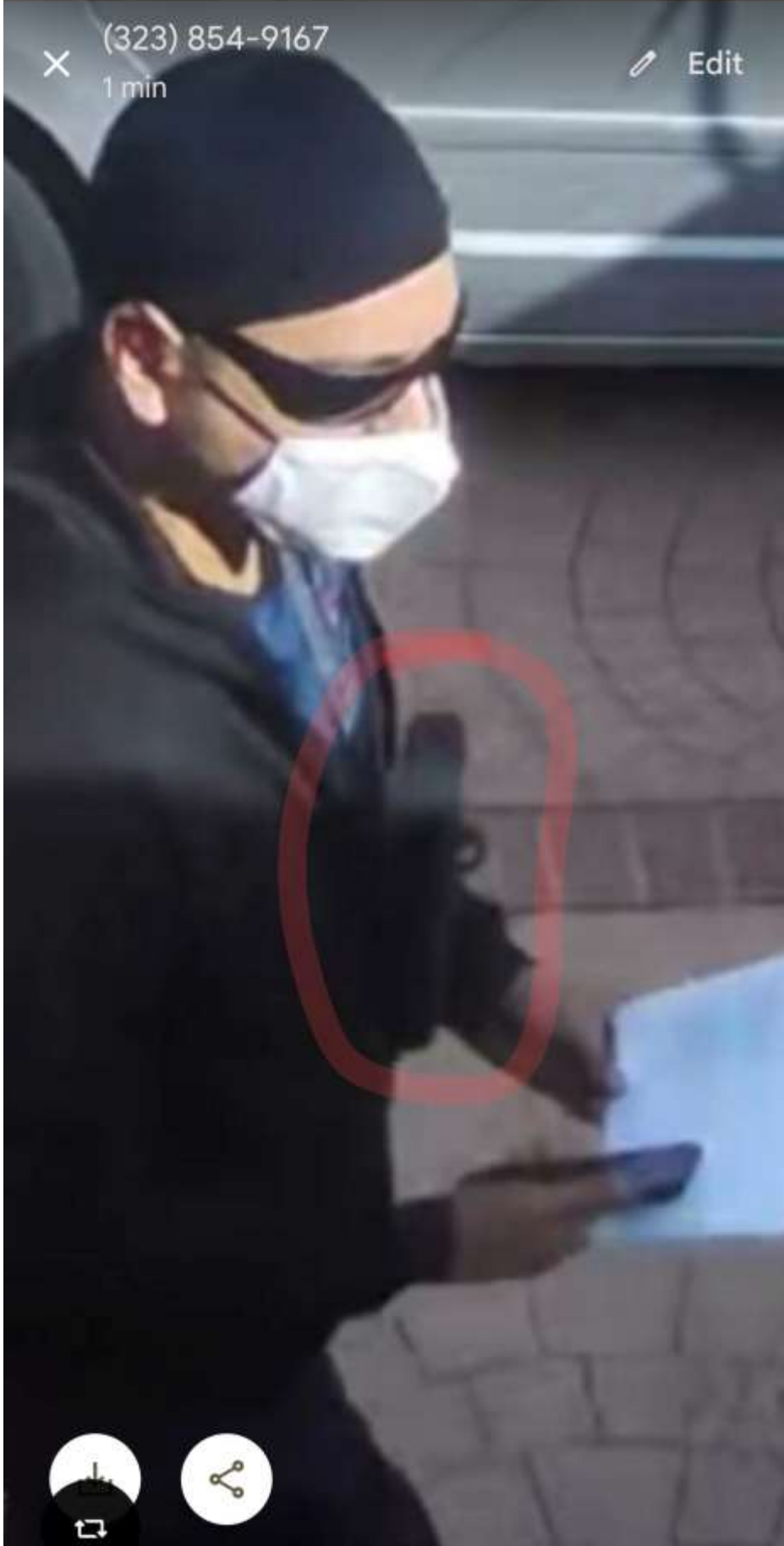


EXHIBIT 10

(Bryan sending to Alla Zorikova rape threats)

On Fri, Nov 15, 2024, 7:57 AM Bryan <ad78ec7b-ed50-409d-9710-0c1ba0f5ccc3@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds

Imagine a thick,
unwashed cock sliding
in and out of your
anus.

Reply Now

EXHIBIT 11

(Warrants to Search Thieves, represented by Bryan Pease, property)

Authority to Record Scene/Evidence

The granting of this Search Warrant shall specifically authorize the officers to photograph and/or video tape the location being searched to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search. Investigative personnel, sworn or non-sworn are authorized to assist in the search in order identify, document and collect evidence, provided their participation is supervised by a sworn officer.

Disposition of Evidence seized

It is further requested that the San Bernardino County Sheriff's Department be authorized, without necessity of further Court Order:

1. To evaluate, process and download any electronic storage devices seized, to produce information from them for analysis by detectives.
2. To retain seized evidence for scientific testing and storage prior to trial. The property will then be disposed of in accordance with law and Department Policy upon adjudication of the complaint and all appeals have been made.
3. To return seized property if found to have no evidentiary value to any known victims or other subjects if such items have been photographically documented and was not directly related to forensic evidence.

character) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, dongles, biometric readers, retina scanners, facial recognition systems, voice authentication systems, hand writing authentication systems and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

Authority to Duplicate Electronic Media

It is further requested that a forensic technician, sworn or non-sworn, be granted authorization to examine, make duplicate images/copies of the above-mentioned electronic media and to determine if evidence of the offenses enumerated above are contained therein. Therefore, authorization is requested to make images/copies of the requested data. Evidence copies of the items relating to these offenses will be created and retained for further proceedings and made available to the authorities. Only those items recovered under the Search Warrant and relating to the offenses will be retained. The master copy will be retained in evidence storage for later discovery and trial purposes.

Request for Off-Site Search Authorization

For the following reasons, the execution of this warrant may take a great deal of time and require a secure facility, special equipment, and software:

It is unknown what operating system is running the computer(s) that is subject of this warrant and, therefore, it will take time to determine how the operating system permits access to data. The amount of data that may be stored in the hard drives and removable storage devices is enormous, and the number or size of the hard drives and removable storage devices that will have to be searched pursuant to this warrant is not known.

The data to be seized may be located anywhere on the hard drives and removable storage devices, including hidden files, program files, and "deleted" files that have not been overwritten. The data may be encrypted, or inaccessible without a password, and may be protected by self-destruct programming, all of which take time to bypass. Because data stored on a computer can be destroyed or altered rather easily, either intentionally or accidentally, the search must be conducted carefully and in a secure environment. To prevent alteration of data and insure the integrity of the search, clones (master copies) of all data storage devices will be made. The clones (master copies) will then be searched and this process will take time and special equipment.

Furthermore, a lengthy on-site search may pose a severe hardship on all people who [live][work] on the premises. It would also require the presence of law enforcement officers to secure the premises while the search is being conducted, thus depleting law enforcement resources in the community.

It is therefore requested that authorization be given to remove all electronic storage devices and storage media that are found on the premises to an off-site location, with the necessary resources and equipment to conduct the search safely and efficiently. It is further requested that authorization be given to search for and seize all peripheral devices that appear to be reasonably necessary to access data stored in the electronic storage devices and storage media.

Search Warrant DR#

- 5 -

Warrant ID: 000045354

Page 5 of 9

16

Attachment "A"

Documentation

Any written or electronically stored documentation relating to the possession, treatment or sales of the stolen German Shepherds from [REDACTED] Lockhart Road, Hinkley CA. Also, any documentation which may indicate who the German Shepherds were sold to or placed with. To include all business or personal records documenting the above mentioned stolen German Shepherds. The German Shepherds were stolen August 8, 2020 and August 12, 2020.

Electronic Storage Devices & Hardware

Electronic storage devices consist of all equipment which can collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar transmission, reception, collection and storage of data. Electronic storage device includes (but is not limited to) any wireless/cellular telephone, cordless telephone, pager, fax machine, digital camera, audio recorder, video recorder and any data-processing device e.g. central processing units, memory typewriters, self-contained "laptop", "notebook", "mini-notebook", or "personal data assistant" computers. Internal and external storage devices e.g. fixed disks (hard drives), memory cards, floppy disk, LS-120, zip drive, jazz drive, Orb drive, CD drive, DVD drive, diskettes, tape drives, optical storage devices, transistor-like binary devices, and other memory storage devices including the storage media used in the devices.

Peripheral input/output device e.g. as keyboards, printers, scanners, plotters, video display monitors, optical readers.

Related communication devices e.g. modems, cables and connections, recording equipment, RAM or ROM units, acoustic couplers, automatic dialers, speed dialers, programmable telephone dialing or signaling devices, and electronic tone-generating devices. Any device, mechanism, or parts that can be used to restrict access to electronic storage devices e.g. physical keys and locks bio metric readers, retinal scanners, facial recognition, signature verification, smart card or voice authentication.

Software

Computer/Equipment software (digital information) can be interpreted by electronic storage device equipment, computers and any of its related components to direct the way they work. Software is stored in electronic, magnetic, optical or other digital form. It commonly includes programs to run operating systems, applications (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communication programs.

Documentation

Electronic storage device documentation consists of written, recorded, printed, or electronically stored material that explains or illustrates how to configure or use electronic storage device hardware, software, or other related items.

Passwords and Data Security Devices

Electronic storage device passwords and other data security devices are designed to restrict access to or hide software, documentation, or data. Data security devices may consist of hardware, software, or other programming code. A password (a string of alphanumeric

FOR THE FOLLOWING PROPERTY:

See attachment "A"

AND TO SEIZE IT IF FOUND and bring it before me, or this court, at the courthouse of this court. This Search Warrant and Incorporated Affidavit was sworn to and subscribed before me this 9th day of SEPTEMBER 2020, at _____ a.m./p.m. Wherefore, I find probable cause for the issuance of this Search Warrant and do issue it.

_____, NIGHT SEARCH APPROVED: YES NO
(Signature of Magistrate)
Judge of the Superior Court, High Desert Judicial District

PREMISES TO BE SEARCHED:

██████████ Pier Drive, Victorville, CA 92395



██████████ Pier Drive, Victorville, CA 92395, is a single-family residence with a brown asphalt roof. The address is located on the curb on the north side of the driveway and affixed to the fascia above the garage. The residence is located on the east side of the roadway and the front door faces west.

YOU ARE THEREFORE COMMANDED TO SEARCH:

The search of the above location shall include all: rooms, attics, basements, sub-basements, file cabinets, storage devices, electronic storage devices, cellular phones, smart phones, containers or compartments, surrounding grounds, any garages, out-buildings, sheds, cellars, safes, vaults and other parts therein; subterranean burial grounds, outside storage areas, storage units, bushes, easements, alleyways, trees, adjoining utility right-of-ways connected to the property, trash containers, trailers, campers, outbuildings of any kind and any place or thing not listed that could be reasonable to conceal or contain the following property and/or persons located therein, and all persons located on or at the premises. Any device or container of significant size to conceal the below listed property to be seized, that is found on or connected to the property to be searched. The search shall also include any vehicles, as defined by VC 670, which are found on the property or under the control of persons on the property.

The search shall specifically authorize the officers of the San Bernardino County Sheriff's Department, San Bernardino County District Attorney's Office, Federal Bureau of Investigation, San Bernardino County Fire Department Arson Investigators, California Highway Patrol, and any peace officer, as defined in Chapter 4.5 of the California Penal Code, a locksmith to be supervised by law enforcement personnel during the investigation, who are summoned to assist by the affiant, to photograph and/or videotape the location being searched in order to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search.

ORIGINAL [redacted] PIER



SUPERIOR COURT OF CALIFORNIA
County of San Bernardino

SEARCH WARRANT
Probable Cause Warrant to Search
(Penal Code Section 1524)

Warrant
No.

Report #: 083001074

SEARCH WARRANT AND AFFIDAVIT

AFFIDAVIT

I, Detective B. Grimm swear under oath that the facts expressed by me in the attached and incorporated Statement of Probable Cause are true and that based therein I have probable cause to believe and do believe that the articles, property, and persons described below may be lawfully seized pursuant to Penal Code Section 1524, as indicated below, and is now located at the location(s) set forth below. Wherefore, I request that this Search Warrant be issued.

[Handwritten Signature]
(Signature of Affiant)

HOBBS SEALING REQUESTED:
NIGHT SEARCH REQUESTED:

YES NO
 YES NO

SEARCH WARRANT

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF SAN BERNARDINO: proof by affidavit, under penalty of perjury, having been made before me by Deputy B. Grimm that there is probable cause to believe that the property or person described herein may be found at the location(s) set forth herein and that it is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by "X" (s), in that:

- It was stolen or embezzled;
- It was used as the means of committing a felony;
- It is possessed by a person with the intent to use it as means of committing a public offense or is possessed by another to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery;
- It tends to show that a felony has been committed or that a particular person has committed a felony;
- It tends to show that sexual exploitation of a child, in violation of Penal Code Section 311.3, or possession of matter depicting sexual conduct of a person under the age of 18 years, in violation of Section 311.11, has occurred or is occurring;
- an arrest warrant has been issued for _____ N/A _____;
- a provider of electronic communication service or remote computing service has records of evidence, as specified in Penal Code Section 1524.3, showing that property was stolen or embezzled constituting a misdemeanor, or that property or things are in possession of any person with intent to use them as a means of committing a misdemeanor public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery;

WARRANT NOTES

(No Notes)

County of San Bernardino.

...the people of the State of California to any peace officer in the County of San Bernardino:

Proof, by affidavit, having been this day made before me by telephone by the officer whose signature is affixed to the affidavit, that there is probable cause for believing that evidence tending to show that a felony (or felonies) has or have been committed, you are therefore commanded to make search on the person and/or property set forth in the description page and/or affidavit, which is incorporated by reference herein; and, in the case of a thing or things or personal property, if you find the same or any part thereof, to bring the thing or things or personal property forthwith before me at the courthouse of this Court.

Given under my hand, and issued at 17:04 on this 2nd day of September, 2020

Hobbs Sealing Approved: **NO**

Night Service Approved: **NO**

A rectangular box containing a handwritten signature in black ink. The signature is cursive and appears to read "Steve Mapes".

Judge Steve Mapes

Warrant ID: 000045029

END OF WARRANT

Authority to Record Scenes/Evidence

The granting of this Search Warrant shall specifically authorize the officers to photograph and/or video tape the location being searched to preserve the image of the scene, the location of property, and to identify any inhabitants or persons present or arriving at the property during the search. Investigative personnel, sworn or non-sworn are authorized to assist in the search in order identify, document and collect evidence, provided their participation is supervised by a sworn officer.

Disposition of Evidence seized

It is further requested that the San Bernardino County Sheriff's Department be authorized, without necessity of further Court Order:

1. To evaluate, process and download any electronic storage devices seized, to produce information from them for analysis by detectives.
2. To retain seized evidence for scientific testing and storage prior to trial. The property will then be disposed of in accordance with law and Department Policy upon adjudication of the complaint and all appeals have been made.
3. To return seized property if found to have no evidentiary value to any known victims or other subjects if such items have been photographically documented and was not directly related to forensic evidence.

characters) usually operates as a sort of digital key to "unlock" particular data security devices. Data security hardware may include encryption devices, chips, dongles, biometric readers, retina scanners, facial recognition systems, voice authentication systems, hand writing authentication systems and circuit boards. Data security software or digital code may include programming code that creates "test" keys or "hot" keys, which perform certain pre-set security functions when touched. Data security software or code may also encrypt, compress, hide, or "booby-trap" protected data to make it inaccessible or unusable, as well as reverse the process to restore it.

Authority to Duplicate Electronic Media

It is further requested that a forensic technician, sworn or non-sworn, be granted authorization to examine; make duplicate images/copies of the above-mentioned electronic media and to determine if evidence of the offenses enumerated above are contained therein. Therefore, authorization is requested to make images/copies of the requested data. Evidence copies of the items relating to these offenses will be created and retained for further proceedings and made available to the authorities. Only those items recovered under the Search Warrant and relating to the offenses will be retained. The master copy will be retained in evidence storage for later discovery and trial purposes.

Request for Off-Site Search Authorization

For the following reasons, the execution of this warrant may take a great deal of time and require a secure facility, special equipment, and software:

It is unknown what operating system is running the computer(s) that is subject of this warrant and, therefore, it will take time to determine how the operating system permits access to data. The amount of data that may be stored in the hard drives and removable storage devices is enormous, and the number or size of the hard drives and removable storage devices that will have to be searched pursuant to this warrant is not known.

The data to be seized may be located anywhere on the hard drives and removable storage devices, including hidden files, program files, and "deleted" files that have not been overwritten. The data may be encrypted, or inaccessible without a password, and may be protected by self-destruct programming, all of which take time to bypass. Because data stored on a computer can be destroyed or altered rather easily, either intentionally or accidentally, the search must be conducted carefully and in a secure environment. To prevent alteration of data and insure the integrity of the search, clones (master copies) of all data storage devices will be made. The clones (master copies) will then be searched and this process will take time and special equipment.

Furthermore, a lengthy on-site search may pose a severe hardship on all people who [live][work] on the premises. It would also require the presence of law enforcement officers to secure the premises while the search is being conducted, thus depleting law enforcement resources in the community.

It is therefore requested that authorization be given to remove all electronic storage devices and storage media that are found on the premises to an off-site location, with the necessary resources and equipment to conduct the search safely and efficiently. It is further requested that authorization be given to search for and seize all peripheral devices that appear to be reasonably necessary to access data stored in the electronic storage devices and storage media.

Attachment "A"

Documentation:

Any written or electronically stored documentation relating to the possession, treatment or sales of the stolen German Shepherds from [REDACTED] Couchart Road, Hinkley CA. Also, any documentation which may indicate who the German Shepherds were sold to or placed with. To include all business or personal records documenting the above mentioned stolen German Shepherds. The German Shepherds were stolen August 8, 2020 and August 12, 2020.

Electronic Storage Devices & Hardware

Electronic storage devices consist of all equipment which can collect, analyze, create, display, convert, store, connect, or transmit electronic, magnetic, optical, or similar transmission, reception, collection and storage of data. Electronic storage device includes (but is not limited to) any wireless/cellular telephone, cordless telephone, pager, fax machine, digital camera, audio recorder, video recorder and any data-processing device e.g. central processing units, memory typewriters, self-contained "laptop", "notebook", "mini-notebook", or "personal data assistant" computers. Internal and external storage devices e.g. fixed disks (hard drives), memory cards, floppy disk, LS-120, zip drive, jazz drive, Orb drive, CD drive, DVD drive, diskettes, tape drives, optical storage devices, transistor-like binary devices, and other memory storage devices including the storage media used in the devices.

Peripheral input/output device e.g. as keyboards, printers, scanners, plotters, video display monitors, optical readers.

Related communication devices e.g. modems, cables and connections, recording equipment, RAM or ROM units, acoustic couplers, automatic dialers, speed dialers, programmable telephone dialing or signaling devices, and electronic time-generating devices. Any device, mechanism, or parts that can be used to restrict access to electronic storage devices e.g. physical keys and locks bio metric readers, retinal scanners, facial recognition, signature verification, smart card or voice authentication.

Software

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Search Warrant DS#

- 4 -

Warrant ID: 00004500

Page 4 of 8

8

WARRANT NOTES

(No Notes)

County of San Bernardino.


The people of the State of California to any peace officer in the County of San Bernardino:

Proof, by affidavit, having been this day made before me by telephone by the officer whose signature is affixed to the affidavit, that there is probable cause for believing that evidence tending to show that a felony (or felonies) has or have been committed, you are therefore commanded to make search on the person and/or property set forth in the description page and/or affidavit, which is incorporated by reference herein; and, in the case of a thing or things or personal property, if you find the same or any part thereof, to bring the thing or things or personal property forthwith before me at the courthouse of this Court.

Given under my hand, and issued at 11:58 on this 9th day of September, 2020

Hobbs Sealing Approved: NO

Night Service Approved: NO



Judge Corey G Lee

Warrant ID: 000048354

END OF WARRANT

EXHIBIT 12

RECORDING REQUESTED BY
Tory Burningham
AND WHEN RECORDED MAIL THIS DEED AND, UNLESS OTHERWISE SHOWN BELOW, MAIL TAX STATEMENT TO:

Name Alla Zorikova
Street Address 279 Quantrill Hollow
City & State Montreal, MO. 65591
Zip

Title Order No. Escrow No. 011418

Recorded in Official Records, County of San Bernardino



BOB DUTTON
ASSESSOR - RECORDER - CLERK

R Regular Mail

Doc# 2018-0234588



6/28/2018
11:10 AM
FV
SAN

Titles	1	Pages	1
Fees			24.00
Taxes			2.75
Ch. 502 Fee			0.00
Others			0.00
Total			26.75

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Grant Deed

THE UNDERSIGNED GRANTOR (S) DECLARE (S)

APN: 0502-085-75-0000

DOCUMENTARY TRANSFER TAX IS \$ 2.75

unincorporated area City of Barstow

computed on full value of interest or property conveyed, or

computed on full value less value of liens or encumbrances remaining at time of sale, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

Tory J. Burningham 10102 S. Redwood Road, #201 South Jordan, Utah 84095

hereby GRANT(S) to

Alla Zorikova 279 Quantrill Hollow, Montreal, MO. 65591

the following described real property in the

County of San Bernardino, state of California

The Southwest Quarter of the Southwest Quarter of the Southeast Quarter of Section 33,
Township 32 South, Range 43 East Mount Diablo Meridian

Dated 5/17/18

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

~~STATE OF CALIFORNIA~~ State of Utah
COUNTY OF Salt Lake

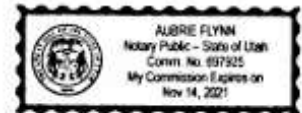
On May 17 2018 before me, Aubrie Flynn - Notary Public
(Type name and title of the officer)

, notary public, personally appeared Tory J Burningham
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the state of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal

Signature



(This area for official notarial seal)

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE

Name


Street Address

City, State & Zip

RECORDING REQUESTED BY
Alla Zorikova
 AND WHEN RECORDED MAIL DOCUMENT AND
 TAX STATEMENT TO:
 NAME **Olivia Jeong**
 STREET ADDRESS **279 Quantrell
 Hollan**
 CITY, STATE &
 ZIP CODE **Montreal, MO
 65591**

Recorded in Official Records, County of San Bernardino 11/29/2018
BOB DUTTON 11:48 AM
 ASSESSOR - RECORDER - CLERK NP
 SAN
 R Regular Mail
 Titles 1 Pages 1
 Fees 14.00
 Taxes 0.00
 CA SB2 Fee 75.00
 Others 0.00
 Paid \$89.00

Doc# 2018-0443016



TITLE ORDER NO. ESKROW NO. SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

APN:
0502-085-75-0000

The undersigned grantor(s) declare(s):
 DOCUMENTARY TRANSFER TAX \$ **0.00**
 computed on full value of property conveyed, or
 computed on full value less liens and encumbrances remaining at time of sale.
 Unincorporated Area City of _____

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, I (We) **Alla A. Zorikova**
 hereby remise, release and grant to **Dmitreeva Zinaida, Olivia Jeong,
 Uris Semerikin, Alla Zorikova**
 the following described real property in the City of **BARSTOW** County of **San Bernardino**
 State of California, with the following legal description:

10/9/18
 Date

 Signature of Grantor
Alla Anatolyevna Zorikova
 Typed or Printed Name of Grantor

**vacant land section 33,
 T32S, R43E
 address: 13350 Trump Blvd.
 BARSTOW, CA 92311**
 Signature of Grantor
 Typed or Printed Name of Grantor


A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF **Missouri**
 COUNTY OF **Camden**

On **10/9/18** before me, **Jeannine L Evans, Notary Public**
 personally appeared **Alla Anatolyevna Zorikova**, who proved to me on the basis of

satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

 Signature of officer



JEANNINE L. EVANS
 My Commission Expires
 October 13, 2020
 Camden County
 Commission #12529477

(Seal)

* There are various types of deed forms depending on each person's legal status. Before you use this form you may want to consult an attorney if you have questions concerning which document form is appropriate for your transaction.

\

EXHIBIT 13

(DECLARATION OF BRYAN PEASE ADMITTING HIS POSTS UPON
ZORIOVA)

1 **LAW OFFICES OF BRYAN W. PEASE**

2 Bryan W. Pease, Esq. (SBN 239139)
3 302 Washington St. #404
4 San Diego, CA 92103
5 Phone 619-723-0369
6 E-Mail: bryan@bryanpease.com

ELECTRONICALLY FILED

Superior Court of California,
County of San Diego
12/18/2020 at 08:02:00 PM
Clerk of the Superior Court
By Gen Dieu, Deputy Clerk

5 **LAW OFFICES OF CASEY D. GISH**

6 Casey D. Gish, Esq. (SBN 206289)
7 5940 S. Rainbow Blvd.
8 Las Vegas, NV 89118
9 Ph. (702) 583-5883
10 E-mail: casev@gishlawfirm.com

9 **LAW OFFICES OF G. DAVID TENENBAUM**

10 G. David Tenenbaum (SBN 150629)
11 269 S. Beverly Drive #1041
12 Beverly Hills, CA 90212
13 Ph. (312) 404-7723

13 Attorneys for Cross-Complainants

14 **SUPERIOR COURT OF CALIFORNIA**

15 **COUNTY OF SAN DIEGO**

17 ALLA ZORIKOVA,

Plaintiff,

18 vs.

19 BRYAN PEASE,

Defendant,

21 TINA LAMEY, ANTONETTA MASON, and
22 BRYAN PEASE,

23 Cross-Complainants,

24 vs.

25 ALLA ZORIKOVA; OLIVIA JEONG;
26 DMITREEVA ZINAIDA; URID SEMENIKIN;
27 VON MARKGRAF GERMAN SHEPHERDS;
28 and DOES 1-25,

Cross-Defendants.

) CASE NO. 37-2020-00036459-CU-DF-CTL

) **DECLARATION OF BRYAN PEASE IN**
) **SUPPORT OF DEFENDANT'S**
) **SPECIAL MOTION TO STRIKE**
) **PLAINTIFF'S COMPLAINT AS A**
) **MERITLESS SLAPP SUIT PURSUANT**
) **TO CCP § 425.16**

) Date: April 16, 2021

) Time: 1:30 p.m.

) Dept.: 69

) Judge: Hon. Katherine Bacal

) Complaint filed: October 13, 2020

) Trial date: none set

1 I, Bryan Pease, Esq., declare:

2 1. I am an attorney licensed to practice before all state and federal courts in California and
3 am an attorney of record for Cross-Complainants in the above-captioned case. I state the following of
4 my own personal knowledge.

5 2. I did not make any call to the San Bernardino Sheriff Barstow Station on August 8, 2020
6 as falsely alleged in paragraph 11 of the complaint. I was unaware of the existence of Plaintiff Alla
7 Zorikova or her property as of that date. I have never made any of the statements in paragraph 11 in any
8 call to the San Bernardino Sheriff's Department.

9 3. Plaintiff never served me with the complaint, and I have not seen "Attachment 6," which
10 does not appear to be part of the court file. I do not have a "history of violence against dog breeders" as
11 falsely alleged in paragraph 34 of the complaint.

12 4. Similarly, I have not seen "Attachment 7." I have not been "arrested multiple times for
13 ...violent actions against dog owners," as falsely alleged in paragraph 36 of the complaint.

14 5. I did not call San Bernardino Code Enforcement Division on October 5, 2020 as falsely
15 alleged in paragraph 37 of the complaint. My first call to San Bernardino Code Enforcement regarding
16 Zorikova's unpermitted operation was not until October 9, 2020, and I was informed that a complaint
17 was already being investigated at that time. I have never made any of the statements in paragraph 37 in
18 any call to the San Bernardino Code Enforcement Division.

19 6. I submitted a Public Records Act request following my October 9, 2020 call to San
20 Bernardino County Code Enforcement. The response showed Zorikova was operating an unlicensed
21 kennel without a permit, and did not have required shelter for the dogs. A true and correct copy of the
22 official response I received from the county is attached hereto as Exhibit 1.

23 7. I have never been to the land at issue in this case, have never removed any German
24 Shepherds from any property, and did not even learn about the issues involved in this case or the
25 existence of any party until many days or weeks after Plaintiff's arrest on animal cruelty charges on or
26 about August 8, 2020 and removal of dogs from the vacant land Plaintiff claims to own.

27 8. I did not call any animal control office on October 8, 2020 as falsely alleged in paragraph
28 42 of the complaint, nor have I ever made any false allegations to any animal control office.

1 9. The only photo I have ever posted of Plaintiff was taken by my client, Tina Lamey, when
2 Plaintiff came to Ms. Lamey's property to inspect and look for dogs Plaintiff claimed belonged to her.
3 Ms. Lamey is a small hobby breeder of German Shepherds, and Plaintiff apparently sees her as a
4 competitor. Despite Ms. Lamey allowing Plaintiff to inspect her land and kennels, and showing Plaintiff
5 all of the dogs she had, none of which belonged to Plaintiff, Plaintiff sued Ms. Lamey anyway in San
6 Bernardino Superior Court. The photo of Plaintiff taken by Ms. Lamey that I posted online is unaltered.

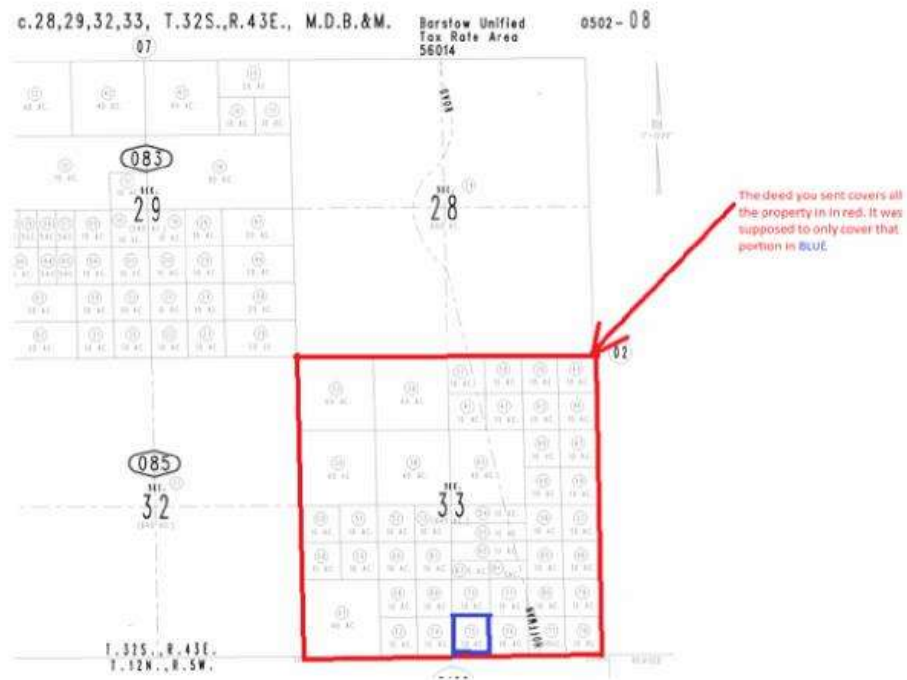
7 10. I posted the photo in connection with my representation of Tina Lamey in *Zorikova v.*
8 *Lamey*, San Bernardino Superior Court Case No. CIVDS 2017383, as well as pending related state and
9 federal civil rights cases in which I am representing other individuals against the San Bernardino
10 Sheriff's Department as it relates to their investigation into the purported "theft" of Zorikova's dogs, and
11 the criminal investigation into that matter. I also posted the photo as part of a warning to consumers, in a
12 public forum, in connection with a matter of public interest, which is Zorikova selling German
13 Shepherds she is breeding and raising in squalid conditions on unimproved land in the desert, in
14 violation of state and local laws concerning adequate shelter. Below is a true and correct copy of this
15 photo, which is the only photo I have ever posted of Zorikova:



1 11. I have never visited any property owned by Plaintiff, nor have I ever taken any pictures
2 of Plaintiff's property, as falsely alleged in paragraph 48 of the complaint. I was unaware of the
3 existence of Plaintiff or her property on August 9, 2020.

4 12. All statements I have posted online regarding Plaintiff and her business have been
5 substantially true.

6 13. My statements regarding Plaintiff claiming to own land that does not belong to her refers
7 to the fact that she recorded a grant deed purporting to convey to herself and others a much larger parcel
8 than the original grant deed reflects. A true and correct copy of the original grant deed is attached hereto
9 as Exhibit 2. A true and correct copy of the new, fraudulent grant deed recorded by Zorikova is attached
10 hereto as Exhibit 3. Below is an image created by a title company to illustrate the portion of land
11 actually owned by Zorikova, as compared to the much larger parcel she attempted to convey to herself
12 and several others:



1 14. Plaintiff has stated on her website, “our PERSONAL PROTECTION DOGS are MORE
2 than JUST GUARD DOGS or JUST IPO TRAINED DOGS, our PROTECTION DOGS will BITE and
3 BITE HARD!! to defend you and your valuables. All our protection dogs had intensive training in real
4 life situations such as kidnapping, carjacking, property defense etc.”

5 (<http://www.vonmarkgrafgermanshepherds.us/>, visited October 11, 2020.)

6 15. I have not stated that Plaintiff keeps dogs under “straight sun.” I have stated that Plaintiff
7 fails to provide adequate shelter as required by state and local law. The veracity of this statement is
8 supported by the San Bernardino County Code Enforcement inspection report.

9 16. Plaintiff was ordered by San Bernardino County Code Enforcement and the San
10 Bernardino County Superior Court to come into compliance with these laws or cease operating. As a
11 result, Plaintiff moved her business to Anza, California in Riverside County and set up a new website,
12 vonschutz.com.

13 17. A notice of violation was issued, contrary to the false claims in paragraph 56.

14 18. Plaintiff was arrested on animal cruelty charges, contrary to the false claims in paragraph
15 57.

16 19. I have not made any statements concerning Plaintiff to the Los Angeles Department of
17 Consumer Affairs or the Los Angeles City Attorney.

18 20. I have never sent any text messages to Plaintiff, as falsely alleged in paragraph 95 of the
19 complaint.

20 21. I have never made any phone calls to Plaintiff, including through any “not in service”
21 phone number, as falsely alleged in paragraph 96 of the complaint. There was already pending litigation
22 and an ongoing Sheriff’s investigation at the time I became aware of Plaintiff’s existence. There would
23 be no reason for me to be contacting Plaintiff except in connection with such official matters, including
24 my pro bono representation of individuals Plaintiff is targeting with frivolous lawsuits.

25 22. I have never organized nor initiated “racketeering and attacks on Plaintiff and her
26 Business” as falsely alleged in paragraph 98 of the complaint.

27 23. Plaintiff has stated previously on her website, <http://vonmarkgrafgermanshepherds.us/>,
28 and currently states on her website vonschutz.com, “Our German Shepherds come through

1 acclimatization to low and high temperatures that they strive while in mountains or performing their
2 duties in any climate. We breed West German Lines german shepherds, bred for 'PERFECTION'. Our
3 Shepherds experience hard working training conditions as well as adopted to luxury staying in
4 mansions." (Former website visited November 15, 2020; current website vonschutz.com visited and
5 last confirmed to contain these statements on December 18, 2020.)

6 24. On October 14, 2020, the San Bernardino Superior Court issued a temporary restraining
7 order requiring Zorikova to come into compliance with state and county laws regarding her lack of
8 shelter for dogs on her property. A true and correct copy of this order is attached hereto as Exhibit 4.

9 25. I did not take the photo referred to in paragraph 49 of the complaint. I did not post
10 anything online regarding Zorikova until October 2020, at which time I did post a photo taken on or
11 about August 9, 2020 of dogs neglected by Zorikova, on my website and on social media. Zorikova has
12 not disputed the authenticity of this photo but instead has accused me of defaming her by taking the
13 photo on private property, even though I did not take the photo, was not present when it was taken, and
14 was unaware of the existence of Zorikova or her property when this photo was taken. Below is a true
15 and correct copy of this photo, which based on all accounts and corroborating public records truly and
16 accurately reflects the conditions in which Zorikova was keeping dogs at the time of her arrest on
17 August 8, 2020.



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

Dated: December 18, 2020

By:

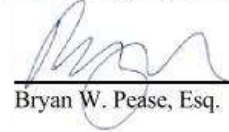

Bryan W. Pease, Esq.

Exhibit 1

APP052



Land Use Services Department
Code Enforcement
NOTICE OF VIOLATION

TO: ZINAIDA, DMITREEVA ETAL OR JEONG, OLIVIA NOTICE DATE: 10/13/2020
ASSESSOR'S PARCEL NUMBER: 0502-085-75-0000 CASE #: C202002475
SITUS ADDRESS: 1335 TRUMP BLVD BARSTOW CA 92311
MAILING ADDRESS: [REDACTED]

THE INDICATED VIOLATION(S) OF THE INTERNATIONAL PROPERTY MAINTENANCE CODE AND/OR THE SAN BERNARDINO COUNTY CODE WERE OBSERVED ON THE SUBJECT PROPERTY DURING AN INSPECTION CONDUCTED ON 10/02/2020:

[] IPMC 302.8 - Motor Vehicles: No inoperative motor vehicle shall be parked, kept, or stored on any premises other than in a garage.
Corrective Action:

[] IPMC 108.1.4 - Unlawful Structures: An unlawful structure that was erected, altered, or occupied contrary to law.
[] Room Addition [] Garage Conversion [] Patio Cover [] Decking [] Carport [] Residence / Manufactured [] Shed-Cargo Container-Barn-Animal Enclosure
Corrective Action:

[] IPMC 108.1.5(7) - Dangerous Structure on Premises: The building or structure is neglected, damaged, dilapidated, unsecured, abandoned, or an attractive nuisance.
Corrective Action:

[] IPMC 102.2 - Maintenance: Structure or premises shall be maintained in good working order.
Corrective Action:

[] IPMC 302.7 - Accessory Structures: Accessory structures, including detached garages, fences and walls, shall be maintained, structurally sound, and in good repair.
Corrective Action:

[] IPMC 308.1 - Garbage: Exterior and interior of property shall be free from any accumulation of rubbish or garbage.
Corrective Action:

[] IPMC 504.1 - Plumbing Systems and Fixtures: Plumbing fixtures shall be properly installed and maintained in working order.
Corrective Action:

[] IPMC 506.1 - Sanitary Drainage: Plumbing fixtures shall be properly connected to either a public sewer system or an approved private sewage disposal system.
Corrective Action:

[] IPMC 602.2 - Heating Facilities: Dwellings shall be provided with heating facilities.
Corrective Action:

[] SBCC 41.2503 - Rental Dwelling Unit License Required: A license is required for the operation of each rental dwelling unit.
Corrective Action:

[] SBCC 84.25.070 A & C - Occupancy/Camping: It is unlawful to temporarily or permanently occupy any vehicle or temporary structure.
Corrective Action:

[] SBCC 84.04.090(h) - Animal Density Standards: The number of animals shall be within approved limits.
Corrective Action:

[x] SBCC 82.02.020(b) No Primary Use - Vacant
Corrective Action: Operating a kennel on a property listed as vacant with no established Primary Use is not allowed. Remove 2 sheds, personal items, vehicles, dogs and makeshift animal enclosures.

The indicated violations must be corrected within 30 days from the date of this notice. A re-inspection of this property to verify compliance will be completed after 11/12/2020. Failure to correct the existing violation(s) may result in the issuance of administrative citations and/or civil or criminal prosecution. A lien and a special assessment on the property tax roll may also be placed against the subject property to recover any regulatory costs incurred by the County.

If you have questions regarding this notice please contact Code Enforcement at (909) 884-4056 or (760) 995-8140.

Notice received by: Standard Mail Code Enforcement Officer: G. Arroyo

08/31/2020: Referral received from T. Campos with veterinary services. Kennel operating on vacant parcel, POs living in tents and make shift storage units built on the parcel. On 8/8/2020 SBCSD found approx. 50 German Shepherds on the property, unclear how many dogs remain as of today. There also a lot of discarded meat that is picks up daily from the Barstow butcher and uses to feed the dogs. Per T. Campos PO has filed a lawsuit against the SBCSD. Photos taken by T. Campos saved to office links. E. Aguero

PROPERTY OWNER CONTACT

09/08/2020 Ella [REDACTED] called and would like a call back to know how to go about getting a kennel permit. P. Harris

PROPERTY OWNER CONTACT

09/09/2020: Ella, [REDACTED] would like to schedule the initial inspection on the property. She also stated that the meat on the property is used for composting. E. Aguero

FIELD INVESTIGATION

10/02/2020 Field investigation conducted at front fence with property owner Ella Zorikova. Ms. Zorikova did not consent to the investigation and all pictures were taken from the public right of way. Ms. Zorikova stated that she only stays on the property when dogs are present. There are 2 shed located on the property with one being metal and one wood Due to no consent to enter property i observed approximately 13 dogs present on the property in individual makeshift cages with tarp being used to shade dogs. 2 Sports utility vehicles were parked at the entrance of the property. Unable to determine if any disposed meat was present on the property.

Ms. Zorikova stated that she has attempted to obtain a kennel permit and I explained to her i was there to investigate the Land use Violation since the property is listed as vacant with no primary use. Ms. Zorikova stated she will attempt to get the kennel permit and if she cannot obtain permit she will leave the property. I explained to Ms. Zorikova that she must talk to planning. I gave Ms. Zorikova my business card and informed her I would be sending a notice. Ms. Zorikova provided me with an address to send notice to and asked any future communication to be with her attorney. I replied that is fine, but her attorney would need to contact Code enforcement and we will not reach out to them and it is her responsibility to keep her attorney informed not ours. Ms. Zorikova understood. Notice will be sent to address on file and also to address provided by Ms. Zorikova, [REDACTED]. G. Arroyo

NOTICE OF VIOLATION

Notice prepared on 10/07/2020 with a mail date of 10/13/2020. 30 day notice will be issued for the following violation: SBCC 82.02.020(b) No Primary Use - Vacant. Notice has been saved to office link and email has been sent to operations for regular mailing. G. Arroyo

NOTICE OF VIOLATION - MAILING:

10/13/2020: Notice of Violation mailed regular status with pictures and scanned to case file. Mailed to: [REDACTED]. N. Candelario

NOTICE OF VIOLATION - MAILING:

10/13/2020: Notice of Violation mailed regular status with pictures and scanned to case file. Mailed to:
[REDACTED] N. Candelario

Exhibit 2

APP065

RECORDING REQUESTED BY
Tory Burningham
AND WHEN RECORDED MAIL THIS DEED AND, UNLESS OTHERWISE SHOWN BELOW, MAIL TAX STATEMENT TO:

Name Alla Zorikova
Street Address 279 Quantrill Hollow
City & State Montreal, MO. 65591
Zip

Title Order No. Escrow No. 011418

Recorded in Official Records, County of San Bernardino



BOB DUTTON
ASSESSOR - RECORDER - CLERK

R Regular Mail

Doc# 2018-0234588



6/28/2018
11:10 AM
FV
SAN

Titles	1	Pages	1
Fees			24.00
Taxes			2.75
CA SB2 Fee			0.00
Others			0.00
Paid			926.75

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Grant Deed

THE UNDERSIGNED GRANTOR (S) DECLARE (S) APN: 0502-085-75-0000
DOCUMENTARY TRANSFER TAX IS \$ 2.75
 unincorporated area City of Barstow
 computed on full value of interest or property conveyed, or
 computed on full value less value of liens or encumbrances remaining at time of sale, and
FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,
Tory J. Burningham 10102 S. Redwood Road, #201 South Jordan, Utah 84095
hereby GRANT(S) to
Alla Zorikova 279 Quantrill Hollow, Montreal, MO. 65591
the following described real property in the
County of San Bernardino, state of California
The Southwest Quarter of the Southwest Quarter of the Southeast Quarter of Section 33,
Township 32 South, Range 43 East Mount Diablo Meridian
Tory J Burningham
Dated 5/17/18
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.
STATE OF CALIFORNIA State of Utah
COUNTY OF Salt Lake
On May 17 2018 before me, Aubrie Flynn - Notary Public
(here insert name and title of the officer)
, notary public, personally appeared Tory J Burningham
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.
I certify under PENALTY OF PERJURY under the laws of the state of California that the foregoing paragraph is true and correct.
WITNESS my hand and official seal.
Signature Aubrie Flynn (This area for official notarial seal)

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE
Name Street Address City, State & Zip

Exhibit 3

APP067

RECORDING REQUESTED BY
Alla Zorikova
 AND WHEN RECORDED MAIL DOCUMENT AND
 TAX STATEMENT TO:
 NAME **Olivia Jeong**
 STREET ADDRESS **279 Quantrell
 Hollau**
 CITY, STATE &
 ZIP CODE **Montreal, MO
 65591**

Recorded in Official Records, County of San Bernardino

11/29/2018
 11:46 AM
 NP
 SAN



BOB DUTTON
 ASSESSOR - RECORDER - CLERK

R Regular Mail

Doc# 2018-0443016



Titles	1	Pages	1
Fees		14.00	
Taxes		0.00	
CA SB2 Fee		75.00	
Others		0.00	
Paid		89.00	

TITLE ORDER NO. _____ ESCROW NO. _____ SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

APN:
0502-085-75-0000

The undersigned grantor(s) declare(s):
 DOCUMENTARY TRANSFER TAX \$ **0.00**
 computed on full value of property conveyed, or
 computed on full value less liens and encumbrances remaining at time of sale.
 Unincorporated Area City of _____

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, I (We) **Alla A. Zorikova**
 hereby remise, release and grant to **Dmitreeva Zinaida, Olivia Jeong,
 Urij Semerikin, Alla Zorikova**
 the following described real property in the City of **BARSTOW** County of **San Bernardino**
 State of California, with the following legal description:

10/9/18
 Date

 Signature of Grantor
Alla Anatolyevna Zorikova
 Typed or Printed Name of Grantor

**vacant land section 33,
 T32S, R43E
 address: 13350 Trump Blvd.
 BARSTOW, CA 92311**
 Signature of Grantor
 Typed or Printed Name of Grantor

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF **Missouri**
 COUNTY OF **Camden**

On **10/9/18** before me, **Jeannine L Evans, Notary Public**
 personally appeared **Alla Anatolyevna Zorikova** who proved to me on the basis of
 satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.
 WITNESS my hand and official seal.

Signature of officer



JEANNINE L EVANS
 My Commission Expires
 October 13, 2020
 Camden County
 Commission #12529477
 (Seal)

* There are various types of deed forms depending on each person's legal status. Before you use this form you may want to consult an attorney if you have questions concerning which document form is appropriate for your transaction.

Exhibit 4

APP069

RECEIVED

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007 18 2020

SUPERIOR COURT OF CALIFORNIA
SAN BERNARDINO COUNTY

FILED BY
COURT CLERK
SUPERIOR COURT OF CALIFORNIA
SAN BERNARDINO COUNTY
OCT 1 2020

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO

ALLA ZORIKOVA,)	CASE NO. CIVDS 2017383
)	
Plaintiff,)	PROPOSED ORDER
vs.)	
TINA LAMEY, <i>et al.</i> ,)	
)	
Defendants.)	
<hr/>		
TINA LAMEY,)	
)	
Cross-Complainant,)	
vs.)	
ALLA ZORIKOVA, an individual; OLIVIA JEONG, an individual; DMITREEVA ZINAIDA; an individual; URID SEMENIKIN, an individual; VON MARKGRAF GERMAN SHEPHERDS, a California corporation; and DOES 1-25,)	
)	
Cross-Defendants.)	
<hr/>		

1 IT IS HEREBY ORDERED:

2 Cross-Defendant Alla Zorikova, and anyone acting on her behalf, is hereby enjoined from
3 engaging in any of the following acts until this matter can be heard on notice:

- 4
- 5 • Keeping more than five dogs without a kennel permit and Special Use Permit,
- 6 pursuant to San Bernardino County Code ("SBCC") §§ 32.0301 and 32.0302;
- 7 • Keeping more than 15 adult dogs without a Conditional Use Permit;
- 8 • Failing to provide adequate housing for the protection of dogs from the elements,
- 9 pursuant to SBCC § 32.0304;
- 10 • Failing to provide access to clean food and water for dogs, pursuant to SBCC
- 11 § 32.0306;
- 12 • Failing to provide adequate housing facilities for dogs, pursuant to SBCC § 32.0113;
- 13 • Tethering a dog for longer than three hours in a 24-hour period, pursuant to Health &
- 14 Safety Code § 122335.

15
16 [The Court appoints _____ as a Receiver pursuant to Bus. & Prof.
17 Code § 17203 to oversee care and placement of the dogs.]

18 Plaintiff is ordered to appear on ~~November 18~~ ^{DECEMBER 9}, 2020 at 9:00 a.m. in Department S22 of the
19 above-captioned Court via CourtCall and show cause, if any exists, why this temporary restraining order
20 should not remain in effect during the pendency of this action as a preliminary injunction.

21 Defendant may file supplemental moving papers by ~~October 26~~ ^{November 14}, 2020. Plaintiff's opposition, if
22 any, is due by ~~November 4~~ ^{November 25, 2020}, 2020. Defendant's reply, if any, is due by ~~November 10~~ ^{December 1}, 2020.

23
24 IT IS SO ORDERED.

25 Dated: 10-14-2020


26 By: 
27 JUDGE OF THE SUPERIOR COURT
28 BRYAN F. FOSTER

EXHIBIT 10

1 **LAW OFFICES OF BRYAN W. PEASE**
 2 Bryan W. Pease, Esq. (SBN 239139)
 3 302 Washington St. #404
 4 San Diego, CA 92103
 Phone 619-723-0369
 E-Mail: bryan@brvanpease.com

ELECTRONICALLY FILED
 Superior Court of California,
 County of San Diego
05/12/2021 at 05:22:00 PM
 Clerk of the Superior Court
 By Kristin Sorianosos, Deputy Clerk

5 **LAW OFFICES OF CASEY D. GISH**
 6 Casey D. Gish, Esq. (SBN 206289)
 7 5940 S. Rainbow Blvd.
 Las Vegas, NV 89118
 Ph. (702) 583-5883
 8 E-mail: casey@gishlawfirm.com

9 **LAW OFFICES OF G. DAVID TENENBAUM**
 10 G. David Tenenbaum (SBN 150629)
 11 269 S. Beverly Drive #1041
 Beverly Hills, CA 90212
 12 Ph. (312) 404-7723

13 Attorneys for Cross-Complainants

14 **SUPERIOR COURT OF CALIFORNIA**

15 **COUNTY OF SAN DIEGO**

17	ALLA ZORIKOVA,)	CASE NO. 37-2020-00036459-CU-DF-CTL
	Plaintiff,)	
18	vs.)	DECLARATION OF BRYAN PEASE,
)	ESQ. IN SUPPORT OF DEFENDANT'S
19	BRYAN PEASE,)	AMENDED SPECIAL MOTION TO
20	Defendant,)	STRIKE PLAINTIFF'S COMPLAINT
)	AS A MERITLESS SLAPP SUIT
21	TINA LAMEY, ANTONETTA MASON, and)	PURSUANT TO CCP § 425.16
22	BRYAN PEASE,)	
	Cross-Complainants,)	Date: April 16, 2021
23	vs.)	Time: 1:30 p.m.
)	Dept.: 69
24)	Judge: Hon. Katherine Bacal
25	ALLA ZORIKOVA; OLIVIA JEONG;)	
26	DMITREEVA ZINAIDA; URID SEMENIKIN;)	Complaint filed: October 13, 2020
27	VON MARKGRAF GERMAN SHEPHERDS;)	Trial date: none set
	and DOES 1-25,)	
28	Cross-Defendants.)	

1 I, Bryan Pease, Esq., declare:

2 1. I am an attorney licensed to practice before all state and federal courts in California and
3 am an attorney of record for Cross-Complainants in the above-captioned case. I state the following of
4 my own personal knowledge.

5 2. I did not make any call to the San Bernardino Sheriff Barstow Station on August 8, 2020
6 as falsely alleged in paragraph 11 of the complaint. I was unaware of the existence of Plaintiff Alla
7 Zorikova or her property as of that date. I have never made any of the statements in paragraph 11 in any
8 call to the San Bernardino Sheriff's Department.

9 3. Plaintiff never served me with the complaint, and I have not seen "Attachment 6," which
10 does not appear to be part of the court file. I do not have a "history of violence against dog breeders" as
11 falsely alleged in paragraph 34 of the complaint.

12 4. Similarly, I have not seen "Attachment 7." I have not been "arrested multiple times for
13 ...violent actions against dog owners," as falsely alleged in paragraph 36 of the complaint. Plaintiff
14 never served the complaint in this case, and I obtained the complaint by downloading it from the Court's
15 website. No attachments were included in the complaint on file with the Court.

16 5. I did not call San Bernardino Code Enforcement Division on October 5, 2020 as falsely
17 alleged in paragraph 37 of the complaint. My first call to San Bernardino Code Enforcement regarding
18 Zorikova's unpermitted operation was not until October 9, 2020, and I was informed that a complaint
19 was already being investigated at that time. I have never made any of the statements in paragraph 37 in
20 any call to the San Bernardino Code Enforcement Division.

21 6. I submitted a Public Records Act request following my October 9, 2020 call to San
22 Bernardino County Code Enforcement. The response showed Zorikova was operating an unlicensed
23 kennel without a permit, and did not have required shelter for the dogs. A true and correct copy of the
24 official response I received from the county is attached hereto as Exhibit 1.

25 7. I have never been to the land at issue in this case, have never removed any German
26 Shepherds from any property, and did not even learn about the issues involved in this case or the
27 existence of any party until many days or weeks after Plaintiff's arrest on animal cruelty charges on or
28 about August 8, 2020 and removal of dogs from the vacant land Plaintiff claims to own.

1 8. I did not call any animal control office on October 8, 2020 as falsely alleged in paragraph
2 42 of the complaint, nor have I ever made any false allegations to any animal control office.

3 9. The only photo I have ever posted of Plaintiff was taken by my client, Cross-
4 Complainant Tina Lamey, when Plaintiff came to Ms. Lamey's property to inspect and look for dogs
5 Plaintiff claimed belonged to her. Ms. Lamey is a small hobby breeder of German Shepherds, and
6 Plaintiff apparently sees her as a competitor. Despite Ms. Lamey allowing Plaintiff to inspect her land
7 and kennels, and showing Plaintiff all of the dogs she had, none of which belonged to Plaintiff, Plaintiff
8 sued Ms. Lamey anyway in San Bernardino Superior Court. The photo of Plaintiff taken by Ms. Lamey
9 on the street outside Ms. Lamey's property that I posted online is unaltered.

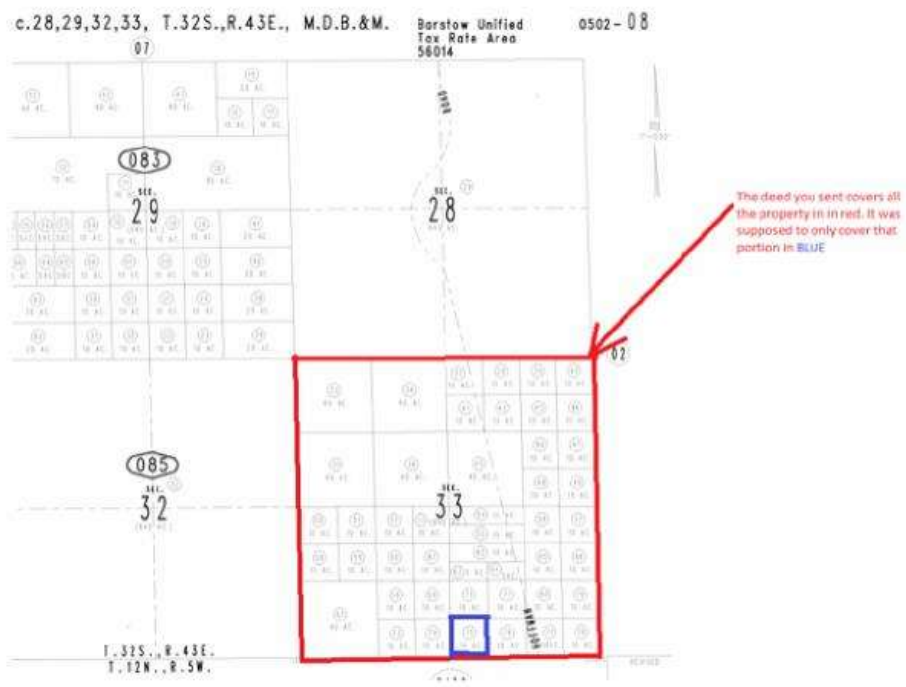
10 10. I posted the photo in connection with my representation of Ms. Lamey in *Zorikova v.*
11 *Lamey*, San Bernardino Superior Court Case No. CIVDS 2017383, as well as pending related state and
12 federal civil rights cases in which I am representing other individuals against the San Bernardino
13 Sheriff's Department as it relates to their investigation into the purported "theft" of Zorikova's dogs, and
14 the criminal investigation into that matter. I also posted the photo as part of a warning to consumers, in a
15 public forum, in connection with a matter of public interest, which is Zorikova selling German
16 Shepherds she is breeding and raising in squalid conditions on unimproved land in the desert, in
17 violation of state and local laws concerning adequate shelter.

18 11. I have never visited any property owned by Plaintiff, nor have I ever taken any pictures
19 of Plaintiff's property, as falsely alleged in paragraph 48 of the complaint. I was unaware of the
20 existence of Plaintiff or her property on August 9, 2020.

21 12. All statements I have posted online regarding Plaintiff and her business have been
22 substantially true, and I believe them all to be true.

23 13. My statements regarding Plaintiff claiming to own land that does not belong to her refers
24 to the fact that she recorded a grant deed purporting to convey to herself and others a much larger parcel
25 than the original grant deed reflects. A true and correct copy of the original grant deed along with the
26 new, fraudulent grant deed recorded by Zorikova is attached hereto as Exhibit 2. Below is an image
27 created by a title company to illustrate the portion of land actually owned by Zorikova, as compared to
28 the much larger parcel she attempted to convey to herself and several others:

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14. Plaintiff has stated on her website, “our PERSONAL PROTECTION DOGS are MORE than JUST GUARD DOGS or JUST IPO TRAINED DOGS, our PROTECTION DOGS will BITE and BITE HARD!! to defend you and your valuables. All our protection dogs had intensive training in real life situations such as kidnapping, carjacking, property defense etc.” (<http://www.vonmarkgrafeermanshepherds.us/>, visited October 11, 2020.) This website has since been moved to vonschutz.com, apparently to avoid the negative publicity from Zorikova’s arrest on animal cruelty charges. A true and correct copy of the vonschutz.com website, last visited on May 12, 2021, with this same language, is attached hereto as Exhibit 3.

15. I have not stated that Plaintiff keeps dogs under “straight sun.” I have stated that Plaintiff fails to provide adequate shelter as required by state and local law. The veracity of this statement is supported by the San Bernardino County Code Enforcement inspection report.

1 16. Plaintiff was ordered by San Bernardino County Code Enforcement and the San
2 Bernardino County Superior Court to come into compliance with these laws or cease operating. As a
3 result, Plaintiff moved her business to Anza, California in Riverside County and set up a new website,
4 vonschutz.com.

5 17. A notice of violation was issued, contrary to the false claims in paragraph 56 of the
6 complaint.

7 18. Plaintiff was arrested on animal cruelty charges, contrary to the false claims in paragraph
8 57 of the complaint.

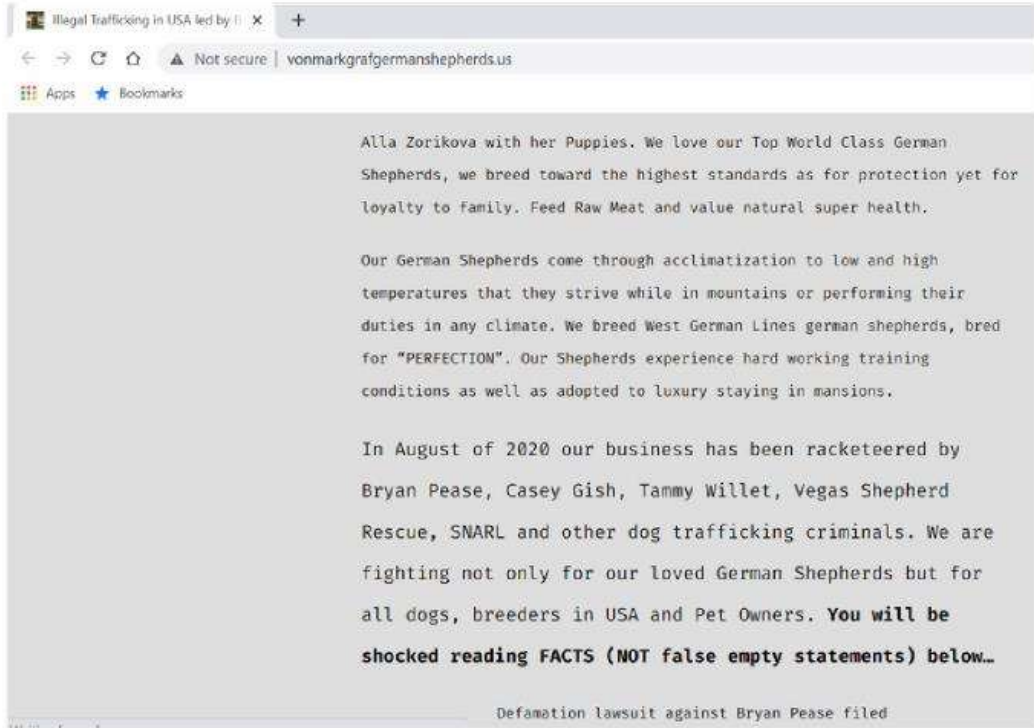
9 19. I have not made any statements concerning Plaintiff to the Los Angeles Department of
10 Consumer Affairs or the Los Angeles City Attorney.

11 20. I have never sent any text messages to Plaintiff, as falsely alleged in paragraph 95 of the
12 complaint.

13 21. I have never made any phone calls to Plaintiff, including through any “not in service”
14 phone number, as falsely alleged in paragraph 96 of the complaint. There was already pending litigation
15 and an ongoing Sheriff’s investigation at the time I became aware of Plaintiff’s existence. There would
16 be no reason for me to be contacting Plaintiff except in connection with such official matters, including
17 my pro bono representation of individuals Plaintiff is targeting with frivolous lawsuits.

18 22. I have never organized nor initiated “racketeering and attacks on Plaintiff and her
19 Business” as falsely alleged in paragraph 98 of the complaint.

20 23. Plaintiff has stated on her website, <http://vonmarkgrafgermanshepherds.us/>, “Our
21 German Shepherds come through acclimatization to low and high temperatures that they strive while in
22 mountains or performing their duties in any climate. We breed West German Lines german shepherds,
23 bred for ‘PERFECTION’. Our Shepherds experience hard working training conditions as well as
24 adopted to luxury staying in mansions.” A true and correct screenshot of this text on Plaintiff’s website
25 that I took on October 25, 202 is shown below:
26
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18 24. On October 14, 2020, the San Bernardino Superior Court issued a temporary restraining
19 order requiring Zorikova to come into compliance with state and county laws regarding her lack of
20 shelter for dogs on her property. A true and correct copy of this order is attached as Exhibit 6 to the
21 Request for Judicial Notice served and filed herewith.

22 25. I did not take the photo referred to in paragraph 49 of the complaint. I did not post
23 anything online regarding Zorikova until October 2020, at which time I did post a photo taken on or
24 about August 9, 2020 of dogs neglected by Zorikova, on my website and on social media. Zorikova has
25 not disputed the authenticity of this photo but instead has accused me of defaming her by taking the
26 photo on private property, even though I did not take the photo, was not present when it was taken, and
27 was unaware of the existence of Zorikova or her property when this photo was taken. Below is a true
28 and correct copy of this photo, which based on all accounts and corroborating public records truly and

1 accurately reflects the conditions in which Zorikova was keeping dogs at the time of her arrest on
2 August 8, 2020.



13
14 26. True and correct copies of my social media postings concerning Zorikova are attached
15 hereto as Exhibit 4.

16 27. A true and correct copy of my website page www.bryanpease.com/trumpblvd as it
17 existed on October 30, 2020 from the Wayback Machine Internet Archive (archive.org) is attached
18 hereto as Exhibit 5. This page also includes my October 5 and 14, 2020 postings, which are clearly
19 marked.

20 28. Attached hereto as Exhibit 6 is a true and correct copy of printouts of Plaintiff's website,
21 www.humanrightsvsanimalrights.org, as seen on May 11, 2021. I know this to be Plaintiff's website
22 because the title of the website is "Von Markgraf German Shepherds vs 'animal rights' activists," the
23 website repeatedly refers to defending the actions of Von Markgraf German Shepherds and Alla
24 Zorikova and attacking me, and is written in Zorikova's unique writing style.

25 29. I was aware of my co-counsel Casey Gish's communications with Don Barnes regarding
26 Alla Zorikova, as well as Mr. Barnes' Yelp review concerning Zorikova, included in Attorney Gish's
27 declaration, contemporaneously with Attorney Gish.

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28

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

Dated: May 12, 2021

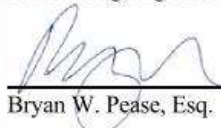
By: 
Bryan W. Pease, Esq.

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Exhibit 1



Land Use Services Department
Code Enforcement
NOTICE OF VIOLATION

TO: ZINAIDA, DMITREEVA ETAL OR JEONG, OLIVIA NOTICE DATE: 10/13/2020
ASSESSOR'S PARCEL NUMBER: 0502-085-75-0000 CASE #: C202002475
SITUS ADDRESS: 1335 TRUMP BLVD BARSTOW CA 92311
MAILING ADDRESS: [REDACTED]

THE INDICATED VIOLATION(S) OF THE INTERNATIONAL PROPERTY MAINTENANCE CODE AND/OR THE SAN BERNARDINO COUNTY CODE WERE OBSERVED ON THE SUBJECT PROPERTY DURING AN INSPECTION CONDUCTED ON 10/02/2020:

[] IPMC 302.8 - Motor Vehicles: No inoperative motor vehicle shall be parked, kept, or stored on any premises other than in a garage.
Corrective Action:

[] IPMC 108.1.4 - Unlawful Structures: An unlawful structure that was erected, altered, or occupied contrary to law.
[] Room Addition [] Garage Conversion [] Patio Cover [] Decking [] Carport [] Residence / Manufactured [] Shed-Cargo Container-Barn-Animal Enclosure
Corrective Action:

[] IPMC 108.1.5(7) - Dangerous Structure on Premises: The building or structure is neglected, damaged, dilapidated, unsecured, abandoned, or an attractive nuisance.
Corrective Action:

[] IPMC 102.2 - Maintenance: Structure or premises shall be maintained in good working order.
Corrective Action:

[] IPMC 302.7 - Accessory Structures: Accessory structures, including detached garages, fences and walls, shall be maintained, structurally sound, and in good repair.
Corrective Action:

[] IPMC 308.1 - Garbage: Exterior and interior of property shall be free from any accumulation of rubbish or garbage.
Corrective Action:

[] IPMC 504.1 - Plumbing Systems and Fixtures: Plumbing fixtures shall be properly installed and maintained in working order.
Corrective Action:

[] IPMC 506.1 - Sanitary Drainage: Plumbing fixtures shall be properly connected to either a public sewer system or an approved private sewage disposal system.
Corrective Action:

[] IPMC 602.2 - Heating Facilities: Dwellings shall be provided with heating facilities.
Corrective Action:

[] SBCC 41.2503 - Rental Dwelling Unit License Required: A license is required for the operation of each rental dwelling unit.
Corrective Action:

[] SBCC 84.25.070 A & C - Occupancy/Camping: It is unlawful to temporarily or permanently occupy any vehicle or temporary structure.
Corrective Action:

[] SBCC 84.04.090(h) - Animal Density Standards: The number of animals shall be within approved limits.
Corrective Action:

[x] SBCC 82.02.020(b) No Primary Use - Vacant
Corrective Action: Operating a kennel on a property listed as vacant with no established Primary Use is not allowed. Remove 2 sheds, personal items, vehicles, dogs and makeshift animal enclosures.

The indicated violations must be corrected within 30 days from the date of this notice. A re-inspection of this property to verify compliance will be completed after 11/12/2020. Failure to correct the existing violation(s) may result in the issuance of administrative citations and/or civil or criminal prosecution. A lien and a special assessment on the property tax roll may also be placed against the subject property to recover any regulatory costs incurred by the County.

If you have questions regarding this notice please contact Code Enforcement at (909) 884-4056 or (760) 995-8140.

Notice received by: Standard Mail Code Enforcement Officer: G. Arroyo

08/31/2020: Referral received from T. Campos with veterinary services. Kennel operating on vacant parcel, POs living in tents and make shift storage units built on the parcel. On 8/8/2020 SBCSD found approx. 50 German Shepherds on the property, unclear how many dogs remain as of today. There also a lot of discarded meat that is picks up daily from the Barstow butcher and uses to feed the dogs. Per T. Campos PO has filed a lawsuit against the SBCSD. Photos taken by T. Campos saved to office links. E. Aguero

PROPERTY OWNER CONTACT

09/08/2020 Ella [REDACTED] called and would like a call back to know how to go about getting a kennel permit. P. Harris

PROPERTY OWNER CONTACT

09/09/2020: Ella, [REDACTED] would like to schedule the initial inspection on the property. She also stated that the meat on the property is used for composting. E. Aguero

FIELD INVESTIGATION

10/02/2020 Field investigation conducted at front fence with property owner Ella Zorikova. Ms. Zorikova did not consent to the investigation and all pictures were taken from the public right of way. Ms. Zorikova stated that she only stays on the property when dogs are present. There are 2 shed located on the property with one being metal and one wood Due to no consent to enter property i observed approximately 13 dogs present on the property in individual makeshift cages with tarp being used to shade dogs. 2 Sports utility vehicles were parked at the entrance of the property. Unable to determine if any disposed meat was present on the property.

Ms. Zorikova stated that she has attempted to obtain a kennel permit and I explained to her i was there to investigate the Land use Violation since the property is listed as vacant with no primary use. Ms. Zorikova stated she will attempt to get the kennel permit and if she cannot obtain permit she will leave the property. I explained to Ms. Zorikova that she must talk to planning. I gave Ms. Zorikova my business card and informed her I would be sending a notice. Ms. Zorikova provided me with an address to send notice to and asked any future communication to be with her attorney. I replied that is fine, but her attorney would need to contact Code enforcement and we will not reach out to them and it is her responsibility to keep her attorney informed not ours. Ms. Zorikova understood. Notice will be sent to address on file and also to address provided by Ms. Zorikova, [REDACTED]. G. Arroyo

NOTICE OF VIOLATION

Notice prepared on 10/07/2020 with a mail date of 10/13/2020. 30 day notice will be issued for the following violation: SBCC 82.02.020(b) No Primary Use - Vacant. Notice has been saved to office link and email has been sent to operations for regular mailing. G. Arroyo

NOTICE OF VIOLATION - MAILING:

10/13/2020: Notice of Violation mailed regular status with pictures and scanned to case file. Mailed to: [REDACTED]. N. Candelario

NOTICE OF VIOLATION - MAILING:

10/13/2020: Notice of Violation mailed regular status with pictures and scanned to case file. Mailed to:
[REDACTED] N. Candelario

Exhibit 2

RECORDING REQUESTED BY
Tory Burningham
AND WHEN RECORDED MAIL THIS DEED AND, UNLESS OTHERWISE SHOWN BELOW, MAIL TAX STATEMENT TO:
Name Alla Zorikova
Street Address 279 Quantrill Hollow
City & State Montreal, MO. 65591
Zip

Recorded in Official Records, County of San Bernardino



BOB DUTTON
ASSESSOR - RECORDER - CLERK

6/28/2018
11:10 AM
FV
SAN

R Regular Mail

Doc# 2018-0234588



Titles	1	Pages	1
Fees			24.00
Taxes			2.75
CA SB2 Fee			0.00
Others			0.00
Paid			926.75

Title Order No. Escrow No. 011418

SPACE ABOVE THIS LINE FOR RECORDER'S USE

Grant Deed

THE UNDERSIGNED GRANTOR (S) DECLARE (S) APN: 0502-085-75-0000
DOCUMENTARY TRANSFER TAX IS \$ 2.75
 unincorporated area City of Barstow
 computed on full value of interest or property conveyed, or
 computed on full value less value of liens or encumbrances remaining at time of sale, and
FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,
Tory J. Burningham 10102 S. Redwood Road, #201 South Jordan, Utah 84095
hereby GRANT(S) to
Alla Zorikova 279 Quantrill Hollow, Montreal, MO. 65591
the following described real property in the
County of San Bernardino, state of California
The Southwest Quarter of the Southwest Quarter of the Southeast Quarter of Section 33,
Township 32 South, Range 43 East Mount Diablo Meridian
Tory J Burningham
Dated 5/17/18
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.
STATE OF CALIFORNIA State of Utah
COUNTY OF Salt Lake
On May 17 2018 before me, Aubrie Flynn - Notary Public
(here insert name and title of the officer)
, notary public, personally appeared Tory J Burningham
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.
I certify under PENALTY OF PERJURY under the laws of the state of California that the foregoing paragraph is true and correct.
WITNESS my hand and official seal.
Signature Aubrie Flynn (This area for official notarial seal)

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE
Name Street Address City, State & Zip

RECORDING REQUESTED BY
Alla Zorikova
 AND WHEN RECORDED MAIL DOCUMENT AND
 TAX STATEMENT TO:
 NAME **Olivia Jeong**
 STREET ADDRESS **279 Quantrell
 Hollau**
 CITY, STATE &
 ZIP CODE **Montreal, MO
 65591**

Recorded in Official Records, County of San Bernardino

11/29/2018
 11:46 AM
 NP
 SAN



BOB DUTTON
 ASSESSOR - RECORDER - CLERK

R Regular Mail

Doc# 2018-0443016



Titles	1	Pages	1
Fees			14.00
Taxes			0.00
CA SB2 Fee			75.00
Others			0.00
Paid			89.00

TITLE ORDER NO. _____ ESCROW NO. _____ SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

GRANT DEED

APN:
0502-085-75-0000

The undersigned grantor(s) declare(s):
 DOCUMENTARY TRANSFER TAX \$ **0.00**
 computed on full value of property conveyed, or
 computed on full value less liens and encumbrances remaining at time of sale.
 Unincorporated Area City of _____

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, I (We) **Alla A. Zorikova**
 hereby remise, release and grant to **Dmitreeva Zinaida, Olivia Jeong,
 Urij Semerikin, Alla Zorikova**
 the following described real property in the City of **BARSTOW** County of **San Bernardino**
 State of California, with the following legal description:

10/9/18
 Date

 Signature of Grantor
Alla Anatolyevna Zorikova
 Typed or Printed Name of Grantor

**vacant land section 33,
 T32S, R43E
 address: 13350 Trump Blvd.
 BARSTOW, CA 92311**
 Signature of Grantor
 Typed or Printed Name of Grantor

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF **Missouri**
 COUNTY OF **Camden**
 On **10/9/18** before me, **Jeannine L Evans, Notary Public**
 personally appeared **Alla Anatolyevna Zorikova** who proved to me on the basis of

satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature of officer



JEANNINE L EVANS
 My Commission Expires
 October 13, 2020
 Camden County
 Commission #12529477

(Seal)

* There are various types of deed forms depending on each person's legal status. Before you use this form you may want to consult an attorney if you have questions concerning which document form is appropriate for your transaction.

Exhibit 3



- [HOME](#)
- [PERSONAL PROTECTION DOGS FOR SALE](#)
- [CONTACT](#)
- [ABOUT](#)
- [PUPPIES](#)
- [TRAINING LEVELS](#)
- [OUR DOGS](#)
- [Care Guide](#)
- [FACILITIES](#)
- [REVIEWS](#)
- [CUSTOMRS GALLERY](#)

VON SCHUTZ ZWINGER

Los Angeles, CA / Palm Beach, FL / Austin, TX / New York,

NY TEXT/CALL: (323) 209-5186

GIVE US A CALL

[Call Us](#)

[Text/Call Us](#)

West German Lines, HAND RAISED, training started TOP PEDIGREE PUREBRED adorable and well mannered PUPPIES AVAILABLE \$3700



Puppies Available! SEE

APP120

027



- [HOME](#)
- [PERSONAL PROTECTION DOGS FOR SALE](#)
- [CONTACT](#)
- [ABOUT](#)
- [PUPPIES](#)
- [TRAINING LEVELS](#)
- [OUR DOGS](#)
- [Care Guide](#)
- [FACILITIES](#)
- [REVIEWS](#)
- [CUSTOMERS GALLERY](#)

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Los Angeles, CA / Palm Beach, FL / Austin, TX / New York,

NY TEXT/CALL: (323) 209-5186



PROTECTION DEMO
 YouTube Video >>

We are home of Top World Dog famous Isko vom Team Hunnegrab

Personal Protection Dogs Bitework

[VIDEO](#)

Puppies AVAILABLE! \$3700 Trained and housebroken
 Bred for intelligence, **WORKING** temperament, exceptional loyalty to the owner.
 Fed RAW meat, trained without electric devices but with only positive motivation, **NO** any temperament related medicines, our dogs are all natural with super natural health. West German and Czech lines.

German Shepherd Puppies in LOS ANGELES, CALIFORNIA available! Champion bloodlines, world class parents imported from Germany and Czech. Super health and



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VON SCHUTZ ZWINGER

Los Angeles, CA / Palm Beach, FL / Austin, TX / New York,

NY TEXT/CALL: (323) 209-5186



our PERSONAL PROTECTION DOGS are MORE than JUST GUARD DOGS or JUST IPO TRAINED DOGS, our PROTECTION DOGS will BITE and BITE HARD!! to defend you and your valuables. All our protection dogs had intensive training in real life situations such as kidnapping, carjacking, property defense etc



- [HOME](#)
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NY TEXT/CALL: (323) 209-5186

The German Shepherd excels at the sport of Schutzhund and is also well known for military and police work.

We can deliver or ship your puppy/dog to you anywhere in the world depending on your country requirements.

Our the finest large boned deep red and black German Shepherd Personal Protection Dogs and Puppies for Sale have natural excellent health and solid temperament for family companions (including small children) and elite protection are from VA BSZS Fathers, show/breeding quality. All our dogs are fed with ORGANIC RAW FOOD DIET, which ensures excellent health and naturally strong Immune system.

We do not have medical bills with exception of routine vaccinations and certifications. Strong immune system is capable on its own to defense the dog naturally from each and every disease.



APP123

030



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NY TEXT/CALL: (323) 209-5186



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323-209-5186
stevejohn19732017@gmail.com
USA

Exhibit 4



Bryan Pease

September 14, 2020 · 🌐



Just filed this lawsuit against County of San Bernardino's outrageous actions in criminalizing animal rescue!

www.bryanpease.com/sanbernardino

BRYANPEASE.COM

County of San Bernardino criminalizing animal rescue

Last month sources within the San Bernardino Sheriff's Department put out a call to help dozens of German Shepherds abandoned on...



👍❤️ 25

16 Comments 11 Shares



Like



Comment



Share



Sharon Logan

Yes!!! Thank you, it's about time!!

Like · Reply · 34w



Christine Haslet

Good for YOU!

These POS police officers/sheriffs who run who SB City shelter and the SB County shelter, Devore are well paid animal abusers. They have been animal abusers for the entire ten years we've been rescuing dogs. We have pulled/rescued severa... [See More](#)

Like · Reply · 34w · Edited



↳ Lori Wagner replied · 1 Reply



Deb Iannuzzi

🙏 thank you for doing that!

Like · Reply · 34w



Vivian Mayfair

Im sharing this.

Like · Reply · 34w



Vivian Mayfair

Christine..please post ohone numbers for San Bernadino shelter. Sheriffs department..etc.

Like · Reply · 34w

↳ Vivian Mayfair replied · 5 Replies





Lori Wagner

THANK YOU, Bryan and legal teams for filing this lawsuit - LONG OVERDUE! The Well Paid Animal Abusers in charge of Devore and Big Bear from Director of An. Svcs., Brian Cronin, down to Chris Covengton and Kelly Papp need to be behind bars for their c... See More

Like · Reply · 34w



1

Lori Wagner replied · 2 Replies



Kimberly Wulff

Probably the best news I have heard this year. Finally Super grateful. Praying that you can get them. Definitely long over due . The good oh boys club. This has been going on for decades. Hopefully they will be held accountable. Will be f... See More

Like · Reply · 34w · Edited



1



Jane Cartmill










Thank you Bryan.

Like · Reply · 33w



Write a comment...



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Tweet



Bryan Pease
@bryanpease

Just filed this lawsuit against County of San Bernardino's outrageous actions in criminalizing animal rescue!



County of San Bernardino criminalizing animal rescue

[bryanpease.com](#)

2:42 PM · Sep 14, 2020 · Twitter Web App

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Bryan Pease
@bryanpease

Nationally recognized environmental & attorney

What's happening

World news · LIVE

Death toll climbs as violence between Israeli forces and Hamas escalates

Trending with Netanyahu

#DysonClean

New Dyson V15 Detect vacuum
Promoted by Dyson

Politics · Trending

Arabs

51.4K Tweets

Politics · Trending

Rand Paul

89.7K Tweets

COVID-19 · LIVE

COVID-19: News and updates California

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Bryan Pease

October 5, 2020 · 🌐



Why is [San Bernardino County Sheriff's Department](#) helping a Russian national run an illegal "protection dog" business, abusing & neglecting German Shepherds on land improperly recorded as "Trump Blvd" in middle of nowhere? I'm filing a lawsuit against them today.



[BRYANPEASE.COM](#)

San Bernardino County helping animal abusers

Why is San Bernardino County facilitating abuse, neglect, and aban...

👍❤️👍 38

12 Comments 16 Shares



Like



Comment



Share



Laura Costello
Thank you Bryan Pease!!

Like · Reply · 31w



Liz Lemon
Thank you!

Like · Reply · 31w



Anne Jackson
Thank you Bryan Pease!

Like · Reply · 31w



Michele Walther
Thanks Bryan Pease

Like · Reply · 31w 1



Briana Ma
Yes!





Staci Marie
You are my hero Bryan Pease

Like · Reply · 31w 1



Dustine Gallagher
This is insane cruelty.
The temp must be at least 120 degrees out there! What is wrong with these people? We'll donate Bryan. Thank Goodness for your humanity!

Like · Reply · 31w



Mark Lane

Like · Reply · 30w



Liz Jacobelly
Thank you 🙏 😭 1

Like · Reply · 30w



Shannon Kepler McDonald
❤️👉👈 thank u ❤️👉👈

Like · Reply · 30w · Edited



Amber Canavan
What is a "bite dog" business?

Like · Reply · 30w 1



Vivian Mayfair
I support you all the way! Thankyou! 🐕🐕

Like · Reply · 30w



Write a comment...





Bryan Pease
October 5, 2020 · 🌐

👍 Like



Meet Alla Zorikova, animal abuser being helped by [San Bernardino County Sheriff's Department](#). Click here to see an interactive map of the land she is squatting on to run an illegal "protection dog" business <https://www.bryanpease.com/trumpblvd>



👍👍👍 66

22 Comments 121 Shares

👍 Like

💬 Comment

➦ Share



Christina Perry
Oh my god! Those poor German Shepherds ! My heart is breaking. 😭 ...

1 like · Reply · 21w

APP131

038
1/4



Vive la Liberté

The San Bernardino sheriffs department always hosts a huge rodeo every year. They LOVE abusing animals. Looks like they won't have it this year though!



Angry · Reply · 31w



Erin Riley-Carrasco
WTH!?

Like · Reply · 31w

↳ Bryan Pease replied · 1 Reply



Rebecca Schiffman
Is this her and what is this? <https://trellis.law/.../ALLA-ZORIKOVA-VS-ABDUL-ARGHANDEHWAL>

	<p>TRELLIS.LAW</p> <p>19STSC11611 ALLA ZORIKOVA VS ABDUL ARGHANDEHWAL</p>
--	---

Like · Reply · 31w



Bryan Pease
This is the website
www.vonmarkgrafgermanshepherds.us

	<p>VONMARKGRAFGERMANSHEPHERDS.US</p> <p>German Shepherd Puppies in Los Angeles, California</p>
--	--

Like · Reply · Remove Preview · 31w



Melissa Burg
What??!! 😞😞

Like · Reply · 31w



Kim Hart
😞😞

Like · Reply · 31w



Like · Reply · 30w



Deb Iannuzzi



...

Like · Reply · 30w



Sheila Neofelix
San Bernardino News
Breaking San Bernardino News

...

Like · Reply · 30w



Sheila Neofelix
1290 News Talk IE - Riverside/San Bernardino

...

Like · Reply · 30w



Sheila Neofelix
Los Angeles Times

...

Like · Reply · 30w



Sheila Neofelix
Channel 5
Los Angeles News Channel

...

Like · Reply · 30w



Sheila Neofelix
Nathan Winograd

...

Like · Reply · 30w



Katrina KR
Can someone rescue these babies??? Wth 🙄🙄❤️

...

Like · Reply · 30w



Apple Wimolset
What can we do ?

...

Like · Reply · 30w



Apple Wimolset
Carolyn Badger

...

Like · Reply · 30w



Sheila Neofelix
San Bernardino Media | News
San Bernardino, CA Local - News Break
San Bernardino Breaking News... See More

...

Like · Reply · 30w



Lissa McGee
update ? what's going on ?

...

Like · Reply · 21w

↳ Bryan Pease replied · 1 Reply



Write a comment...












APP133

040

5/11/2021

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Bryan Pease
@bryanpease

Why is [@sbcountysheriff](#) helping a Russian national run an illegal "bite dog" business, abusing & neglecting German Shepherds on land improperly recorded as "Trump Blvd" in middle of nowhere? I'm filing a lawsuit against them today.



BUSTED: Von Markgraf / Von Schutz German Shepherds
Why is San Bernardino County facilitating abuse, neglect, and abandonment of dozens of German Shepherds, on land ...
[@bryanpease.com](#)

1:49 PM · Oct 5, 2020 · Twitter Web App

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4 Retweets **3** Likes








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Reply

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Bryan Pease
@bryanpease

Nationally recogniz environmental & ar attorney
 - 

San Bernardino C...
@sbcountysheriff

Official Twitter of th County Sheriff's Dej This site is not mon 911 in case of an er

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- News · Yesterday
- Israel launches deadly airst on Gaza following Hamas r fire on Jerusalem after viol at the city's Al-Aqsa Mosq**
- Trending with [#YangSupportsGen Andrew Yang](#)
-
- #DysonClean**
- New Dyson V15 Detect vacu
 Promoted by Dyson
-
- Trending in United States
- #GinaGoneWild**
- 4,428 Tweets
-
- Leonardo DiCaprio · Trending
- Leonardo DiCaprio**
- Fans are pointing out that ac DiCaprio looks like Leonardo New York Post said he looker in first photos of new Scorsese
Trending with [Scorsese](#)
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Bryan Pease
@bryanpease










...

Messages

APP135




042

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-  Messages
-  Bookmarks
-  Lists
-  Profile
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Bryan Pease
@bryanpease

Meet Alla Zorikova, animal abuser being helped by @sbcountysheriff. Click here to see an interactive map of land she is squatting on to run an illegal "bite dog" business
bryanpease.com/trumpblvd




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2 Retweets **1** Like








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Bryan Pease
@bryanpease

Nationally recogniz environmental & ar attorney
 - 

San Bernardino C...
@sbcountysheriff

Official Twitter of th County Sheriff's Dej This site is not mon 911 in case of an er

- What's happening**
- News · Yesterday
- Israel launches deadly airst on Gaza following Hamas r fire on Jerusalem after viol at the city's Al-Aqsa Mosq**
- Trending with #YangSupportsGen Andrew Yang
-
- #DysonClean**
- New Dyson V15 Detect vacu
-  Promoted by Dyson
-
- Trending in United States
- #GinaGoneWild**
- 4,428 Tweets
-
- Leonardo DiCaprio · Trending
- Leonardo DiCaprio**
- Fans are pointing out that ac DiCaprio looks like Leonardo New York Post said he looker in first photos of new Scorse
- Trending with Scorsese
-
- COVID-19 · LIVE
- COVID-19: News and upda California**
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Bryan Pease
@bryanpease



Messages




044

APP137



Bryan Pease

October 10, 2020 · 🌐



Update: the illegal, unpermitted German Shepherd "protection dog" business being aided and abetted by San Bernardino County Animal Control and Sheriff's Department, run by Russian nationals on "Trump Blvd," has been ordered by code enforcement to shut down. But, they are still operating. Full details at www.bryanpease.com/trumpblvd

385 N. Arrowhead Ave, First Floor, San Bernardino, CA 92415 | Phone: (909) 804-4056 • Fax: (909) 387-8217
www.SBCounty.gov



**Land Use Services Department
Code Enforcement
NOTICE OF VIOLATION**

ZINAIDA, DMITREEVA ETAL OR
TO: JEONG, OLIVIA NOTICE DATE: 10/13/2020
ASSESSOR'S PARCEL NUMBER: 0502-085-75-0000 CASE #: C202002475
SITUS ADDRESS: 1335 TRUMP BLVD BARSTOW CA 92311



👍👎👏 39

2 Comments 32 Shares

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💬 Comment

➦ Share



Bryan Pease

Btw their website is

<http://www.vonmarkgrafgermanshepherds.us/>












VONMARKGRAFGERMANSHEPHERDS.US
German Shepherd Puppies in Los Angeles, California

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APP139

046
1/2

Facebook navigation bar and comment box. The navigation bar includes the Facebook logo, search, menu, and utility icons (add, messages, notifications, dropdown). Below is a comment box with a profile picture, the text "Write a comment...", and icons for emojis, photos, GIFs, and stickers.

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Illegal, unpermitted German Shepherd "bite dog" business supported by @sbsheriff, run by Russian nationals on "Trump Blvd," has been ordered by @SBCounty to shut down, yet is still operating. See bryanpease.com/trumpblvd



6:42 AM · Oct 10, 2020 · Twitter Web App

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 **SB Sheriff's Office** @sbsheriff · Oct 10, 2020
 Replying to @bryanpease and @SBCounty
 @sbsheriff = Santa Barbara

1 | 2

 **Bryan Pease** @bryanpease · Oct 10, 2020
 Sorry about that! @sbcountysheriff (San Bernardino) is the corrupt one supporting animal abuse, not @sbsheriff



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-  **Bryan Pease** @bryanpease
Nationally recognized environmental & attorney
-  **SB Sheriff's Office** @sbsheriff
Official Twitter account for Santa Barbara County Sheriff's Office
-  **SBCounty** @SBCounty
The Official Twitter for Santa Barbara County

What's happening

- News - Yesterday
Israel launches deadly airstrike on Gaza following Hamas fire on Jerusalem after violence at the city's Al-Aqsa Mosque
 Trending with #YangSupportsGai Andrew Yang
 - #DysonClean
 New Dyson V15 Detect vacuum cleaner
 Promoted by Dyson
 - Trending in United States
#GinaGoneWild
 4,428 Tweets
 - Leonardo DiCaprio - Trending
Leonardo DiCaprio
 Fans are pointing out that actor DiCaprio looks like Leonardo DiCaprio in first photos of new Scorsese movie
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Messages

APP142



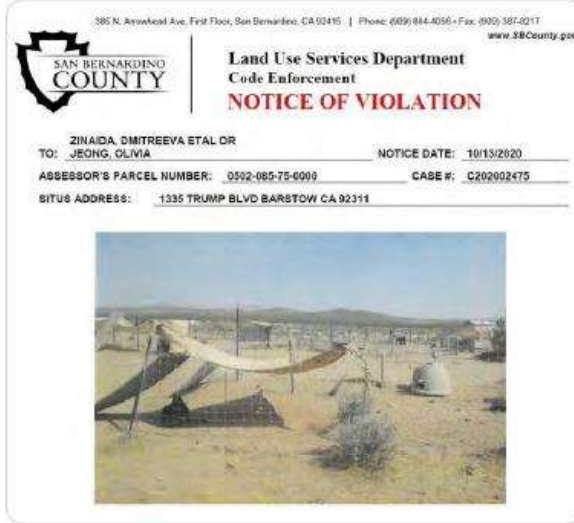
049

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 **Bryan Pease**
@bryanpease

Illegal, unpermitted German Shepherd "bite dog" business supported by @sbcountysheriff (correction: NOT @sbsheriff) run by Russian nationals on "Trump Blvd," has been ordered by @SBCounty to shut down, yet is still operating. See bryanpease.com/trumpblvd



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@bryanpease

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 **San Bernardino C..**
@sbcountysheriff
Official Twitter of the County Sheriff's Dept. This site is not monitored in case of an emergency.

 **SB Sheriff's Office**
@sbsheriff
Official Twitter account of the San Bernardino County Sheriff's Office. Facebook: facebook.com/sant.

What's happening

News - Yesterday
Israel launches deadly airstrike on Gaza following Hamas rocket fire on Jerusalem after violence at the city's Al-Aqsa Mosque.
Trending with #YangSupportsGei Andrew Yang

#DysonClean
New Dyson V15 Detect vacuum cleaner. Promoted by Dyson.

Trending in United States
#GinaGoneWild
4,428 Tweets

Leonardo DiCaprio · Trending
Leonardo DiCaprio
Fans are pointing out that actor DiCaprio looks like Leonardo DiCaprio. New York Post said he looks like Leonardo DiCaprio in first photos of new movie.

Messages
APP143

  050



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Bryan Pease
@bryanpease

Messages **APP144** **051**



Bryan Pease

October 14, 2020 · 🌐



BUSTED: Von Markgraf German Shepherds

I just obtained an injunction to stop Von Markgraf German Shepherds from keeping dozens of dogs in cruel conditions on vacant land, in violation of numerous county codes and state law. The signed order will be posted later today.



BRYANPEASE.COM

San Bernardino Sheriff helping animal abusers

Why is San Bernardino County facilitating abuse, neglect, and aban...

👍❤️ 27

1 Comment 19 Shares



Like



Comment



Share



Laura Costello










Yes!!!! You are sooo good
Animals thank you!!!

Like · Reply · 29w



Write a comment...



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Bryan Pease
@bryanpease

⋮

BUSTED: Von Markgraf German Shepherds
I just obtained an injunction to stop Von Markgraf German Shepherds from keeping dozens of dogs in cruel conditions on vacant land in San Bernardino County, in violation of numerous county codes and state law.



BUSTED: Von Markgraf / Von Schutz German Shepherds
Why is San Bernardino County facilitating abuse, neglect, and abandonment of dozens of German Shepherds, on land ...
[bryanpease.com](#)

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2 Likes








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Nationally recognized environmental & attorney

What's happening

News · Yesterday

Israel launches deadly airstrike on Gaza following Hamas fire on Jerusalem after violence at the city's Al-Aqsa Mosque
Trending with #YangSupportsGenAndrewYang

#DysonClean
New Dyson V15 Detect vacuum
Promoted by Dyson

Trending in United States
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4,428 Tweets

Leonardo DiCaprio · Trending
Leonardo DiCaprio
Fans are pointing out that Leonardo DiCaprio looks like Leonardo DiCaprio New York Post said he looked in first photos of new Scorsese
Trending with Scorsese

COVID-19 · LIVE
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Bryan Pease
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Messages

✉

📁

APP146

053

Exhibit 5



BUSTED: Von Markgraf German Shepherds

The Wayback Machine - <https://web.archive.org/web/20210511090807/https://www.googl...>



coordinates: 35.10N, 117.38W

10/14/20 UPDATE

A San Bernardino Superior Court Judge just issued an injunction to stop Von Markgraf German Shepherds from keeping dozens of dogs in cruel conditions on vacant land, in violation of numerous county codes and state law.

- [Arguments in favor of the injunction](#)

- Court Order

10/10/20 UPDATE

A Public Records Act response has been received from the County of San Bernardino, including photos of German Shepherds currently imprisoned in squalid conditions at "1335 Trump Blvd." in Barstow, CA, taken as recently as 10/2/20. [Click here to view.](#)

The landowners have been ordered to immediately remove "dogs and makeshift animal enclosures" from the property, but code enforcement is apparently taking no further action to confirm compliance until November 12, 2020.

The website for the "bite dog" business these German Shepherds are being bred and abused for is <http://www.vonmarkgrafgermanshepherds.us/>

The illegal actions of San Bernardino Sheriff's Detective Brian Grimm described below appear to have been undertaken in direct retaliation for the filing of this code complaint. Grimm began obtaining warrants based on falsified statements of probable cause and seizing animal rescuers' cellphones and computers on September 3, 2020, just three days after this code complaint was made.



10/5/20

Why is San Bernardino County facilitating abuse, neglect, and abandonment of dozens of German Shepherds at the above location, on land in the middle of nowhere, improperly recorded as "Trump Boulevard," by a squatter to run an illegal "bite dog" business?

Why are San Bernardino County Sheriff's deputies barging into people's homes *in two states* and stealing phones and computers in a misguided effort to locate and return rescued dogs to this illegal business?

Alla Zorikova was arrested on animal cruelty charges on August 8, 2020, and San Bernardino Sheriff's deputies initially called on community members to come rescue dogs

left abandoned on the vacant land that Zorikova was squatting on. But then the County inexplicably dropped the charges and instead began "investigating" animal rescuers as being suspected of "stealing" the dogs.

Here is what it looked like on the above land when rescuers arrived at the request of San Bernardino Sheriff's deputies:



This is Alla Zorikova, who runs the illegal "bite dog" business, pictured below while stalking an animal rescuer's property:



Do you like this page?



Exhibit 6

APP154

061

EXHIBIT 14

(ALLEGEDLY FABRICATED BY BRYAN PEASE, WHILE
KNOWIGNLY FALSE DECLARATION BY JUSTIN SMITH, WITNESS OF BRYAN
PEASE)

1 **LAW OFFICES OF BRYAN W. PEASE**

2 Bryan W. Pease, Esq. (SBN 239139)
3 302 Washington St. #404
4 San Diego, CA 92103
5 Phone 619-723-0369
6 E-Mail: brvan@brvanpease.com

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

05/12/2021 at 05:22:00 PM
Clerk of the Superior Court
By Kristin Sorianosos, Deputy Clerk

5 **LAW OFFICES OF CASEY D. GISH**

6 Casey D. Gish, Esq. (SBN 206289)
7 5940 S. Rainbow Blvd.
8 Las Vegas, NV 89118
9 Ph. (702) 583-5883
10 E-mail: casev@gishlawfirm.com

9 **LAW OFFICES OF G. DAVID TENENBAUM**

10 G. David Tenenbaum (SBN 150629)
11 269 S. Beverly Drive #1041
12 Beverly Hills, CA 90212
13 Ph. (312) 404-7723

13 Attorneys for Cross-Complainants

14 **SUPERIOR COURT OF CALIFORNIA**

15 **COUNTY OF SAN DIEGO**

17 ALLA ZORIKOVA,)
18 Plaintiff,)

18 vs.)

19 BRYAN PEASE,)
20 Defendant,)

21 TINA LAMEY, ANTONETTA MASON, and)
22 BRYAN PEASE,)

23 Cross-Complainants,)

24 vs.)

25 ALLA ZORIKOVA; OLIVIA JEONG;)
26 DMITREEVA ZINAIDA; URID SEMENIKIN;)
27 VON MARKGRAF GERMAN SHEPHERDS;)
28 and DOES 1-25,)

Cross-Defendants.)

CASE NO. 37-2020-00036459-CU-DF-CTL

**DECLARATION OF JUSTIN SMITH
IN SUPPORT OF DEFENDANT'S
AMENDED SPECIAL MOTION TO
STRIKE PLAINTIFF'S COMPLAINT
AS A MERITLESS SLAPP SUIT
PURSUANT TO CCP § 425.16**

Date: June 4, 2021
Time: 11:00 a.m.
Dept.: 69
Judge: Hon. Katherine Bacal

Complaint filed: October 13, 2020
Trial date: none set

1 I, Justin Smith, declare:

2 1. I am over the age of 18 years and competent to testify as a witness. I state the following
3 of my own personal knowledge.

4 2. My partner, Michelle Vuong, and I purchased a puppy from Von Schutz German
5 Shepherds, www.vonschutz.com, on February 17, 2021.

6 3. We did not realize there was anything to suspect until we brought the puppy home and
7 found the puppy to be very, very sick. After trying to attempt to work out a refund from the seller, she
8 became unreasonable and threatened legal action. After some more research the money deposit to Zelle
9 was a different name: Von Markgraf. After a quick Google search for this name, we found the pending
10 litigation against Alla Zorikova. She went by "Sveta" with us. I reported her to the FTC, and contacted
11 the attorneys suing her.

12 4. We had paid \$3800 and picked the puppy up at a home in Los Angeles. When we asked
13 for a refund, Zorikova said she had arranged for another buyer to purchase the puppy directly from us,
14 and that we should meet this other buyer somewhere without her present, sell the puppy for the same
15 price, and she would take care of all the paperwork. She said she contacted her attorney and that we
16 were not to make any comments, and questions would go straight to her.

17 5. The pup is not socialized and is afraid of going outside. He was drinking a massive
18 amount of water, which we learned from taking him to a veterinarian was due to an extreme bladder
19 infection, for which he needed to be put on antibiotics. His ears were filthy when we brought him home
20 and it took half a bag of cotton balls to clean it. He seems very insecure, makes no eye contact and
21 seems to have signs of being in a puppy mill and being abused.

22 6. Zorikova's website also states that all puppies purchased from her are housebroken and
23 have basic obedience training, which this puppy was neither.

24 7. On February 20, 2021, we texted the following to Zorikova:
25 Hello, I spoke to legal counsel and will not participate in this third party transaction with
26 you. I feel that a complete refund is owed to us, this was fraudulent misrepresentation of
27 what was sold. I am keeping the puppy and providing the proper care he needs as there
28 are high indications that this dog has been abused. I am disengaging from our
communication from this point forward.

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8. Zorikova texted us back:

Ok than [sic] I stop communicating with you and another customer. You are requested to deliver the puppy to our place at 5644 Park oak place [sic] today and we will proceed with lawsuit.

You are requested cease [sic] and desist all further communication.

Be advised that defamation lawsuit and breach of contract will e [sic] filed against you if you proceed with any deceiving activity. I am sure that you lied to your "legal counsel", show him the contract. That is it. All further direct communication must be ceased and desist.

All our sales meeting while on private property has been dully [sic] recorded by security cameras, including all statements that has been made. Customer is demanding now the dog be sold to him because I promised yesterday based on our agreement. Let me know immediately if you desire to deliver the puppy to Simi Valley and get your payment or to drop the puppy at Hollywood Hills location while note receiving any refund.

Customer demands response NOW. If you are failing to cooperate and moreover will fail to return puppy today, my attorney trully [sic] will chew you in courts. And if we discovery that you have been sent by competitors or other oppositoinists...man...

9. We finally responded to this flurry of texts with "We will no longer in engage in any conversation with you."

10. Zorikova responded:

Attempts to solve your problems and get to you full payment are harassment? You are showing really bad faith. Up to your request, I will state to that customer that you had refused to deliver the puppy and refused to receive full payment. All communication stopped, no problem

Last notice (required by law): Failure to drop the puppy in good condition (no refund will be provided) to 5644 Park oak place Los Angeles TODAY by 8pm will trigger lawsuit filed against you for breach of contract. If you know in advance that you will not return the puppy today, this text is serving as NOTICE of LAWSUIT against you

11. We have not heard anything from Zorikova since.

12. A true and correct copy of the purchase agreement Zorikova and I signed is attached hereto as Exhibit 1. Michelle and I photographed the agreement when we made the purchase, and

1 Zorikova was supposed to send us a copy along with other papers regarding our puppy, but she never
2 did.

3 13. Since we purchased this puppy from Zorikova, who we named "Whiskey," we have
4 incurred \$1,528.01 in veterinary bills, with some expenses yet to be determined. He still has a urinary
5 tract infection and parasites, which are still being treated. True and correct copies of our veterinary bills
6 for Whiskey are attached hereto as Exhibit 2.

7 14. A chart summarizing our veterinary bills for Whiskey is attached hereto as Exhibit 3.

8
9 I declare under penalty of perjury under the laws of California the foregoing is true and correct.

10
11 Dated: May 11, 2021

By: 

Justin Smith

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Table of Exhibits

Exhibit 1: Sales Agreement (Von Schutz German Shepherds Purchase Contract)..... 7
Exhibit 2: Veterinary Bills 11
Exhibit 3: Veterinary Bill Summary 39

Exhibit 1

APP188

000006

Von Schutz German Shepherds
Purchase Contract

This agreement is made, and hereby entered into, on this 17th day of FEB 2021 20
2021 by and between Von Schutz German Shepherds (hereafter referred to as "Seller"),
and JUSTIN SMITH
(hereafter referred to as "Buyer"), for the purpose of setting forth the terms and conditions
of the purchase by the Buyer of a purebred dog from the litter whelped on Nov. 04
of 2020 but of:

Sir: SG Isco Vom Team Huhngrab
Dam: Jada von Milesevic
AKC Reg # of puppy:

1. The Seller agrees to sell and the Buyer agrees to buy one

pick of the litter

show, work, breeding prospect

pet quality

male

female

puppy from the above described litter

2. Puppy is vaccinated according to his age, dewormed.

3. Seller represents and guarantees that this puppy will have good, stable, serious and protective character.

5. If the Buyer desires during 20 days after he had possessed the puppy to take any and all medical tests for the puppy such as for potential virus/bacterial disease, he shall do this only with the Seller being present with him while at the veterinary clinic of Seller's choice.

6. Puppy and all his ancestors has been fed with raw organic food and is in excellent exceptional health with exceptional strong immune system.

7. The Seller warrants that the above described puppy is in excellent health at the time Buyer assumes ownership. If this puppy has any congenital (birth) defects which result, or may result, in death or euthanization within one year of this sale a replacement puppy of equal value will be made. Seller must be provided with a written report of health problem

from Buyer's veterinarian.

8. The Buyer is completely satisfied and waives any and all claims regarding the puppy's conformation and outward appearance.

9. Full sale price for the puppy is \$ 3,800. Deposit in the amount of \$ 500. Ownership of the puppy shall be transferred to the Buyer after the full sale price to be paid in full on or before picking up the puppy. Only after the full amount of the agreed upon is paid, may the puppy be removed from the Seller's premises. If the balance is left unpaid by _____ of 20__ date, this agreement shall be canceled at the Seller's option and the Buyer shall forfeit the deposit given hereunder.

10. If the dog is sold with Full Registration, dog is guaranteed to pass OFA/OVC hip certifications. Hip x-rays must be taken and submitted to the OFA before the age of 30 months (2 1/2 years), to qualify for this guarantee.

11. Buyer agrees to use the kennel name " Von Schutz" at the end of the dog's first name on the AKC registration application.

12. The Buyer agrees the he/she is not acting as or in part of, an agent in the purchase of this puppy and that the Buyer will not sell this puppy or it's any of it's progeny to any agent, pet store, or guard dog business.

13. The Buyer agrees that if the puppy for any reason will not be able to stay with the Buyer and should it become necessary to sell or otherwise place this puppy, the Buyer will notify the Seller immediately. The Seller will help the Buyer place the puppy. Buyer agrees NEVER and under NO circumstances neither to abandon nor to submit the puppy to shelter/rescue nor to police/sherrif K9 unit. If the proposition of this paragraph will be violated by the Buyer, the Buyer will be responsible for \$10,000.00 paid as compensation for the damages to the Seller.

14. The Buyer agrees that the Seller may repossess the animal upon evidence of neglect and/or abuse at no expense to the Seller, and no refund of any moneys. If the puppy is sold as a pet and companion, his suitability for any additional use will depend solely on the environment and training provided by the Buyer.

15. Puppies sold with full registration are judged by the Seller, at the time of sale, to have show and breeding potential only, and are not guaranteed to be showable at maturity.

16. These guarantees apply to the original purchaser only and are not transferable. This guarantee becomes null and void if the Buyer does not return signed contract, does not submit the AKC registration application to AKC within two months of receiving the form.

17. The breeder/seller reserves the right to a second veterinarian's opinion. All relevant veterinary records must be supplied to the breeder/seller upon request.

- 18. All communication between Seller and Buyer shall be kept private and confidential.
- 19. Buyer understands that any and all false evasive statements against Seller or the puppy made by the Buyer will be defended via lawsuit and the Buyer will be responsible for all the damages occurred to the Seller.
- 20. The Buyer agrees that if the puppy will be spayed/neutered before age of 2 years old all guarantees will be waived.
- 21. This Agreement is made and signed by both parties to insure the well being of this animal. If any part of this Agreement is breached, the Seller is released from any further obligations hereunder.
- 22. Should the Seller/Buyer need to seek legal action against the Buyer/Seller for violations of this Agreement, both parties will assume its own any and all attorney costs and court fees and law, venue and jurisdiction of the State of where the Seller resides.

Vaccine done: 1. NeoPar against Parvo virus on Dec. 15 of 2020, Jan. 18 2021
 2. Nobivac against Parvo/Destemper virus on Dec. 15 of 2020 Jan 18 2021

Vaccine needed: Third NeoPar vaccine against Parvo due — of 20—, Destemper vaccine due on — of 20—, Rabbits vaccine due on — of 20—.

Deworming done: Done

Seller: Von Schutz German Shepherds
 1905 Wilcox Ave.,
 #175, Los Angeles,
 CA 90068
 (323)-209-5186



Date 02/17/21

Buyer: JUSTIN SMITH

Address: [REDACTED]

Date 2/17/21

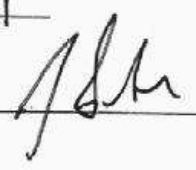
ID#:  [REDACTED]

Exhibit 2

APP192

000010

Garden Grove Dog & Cat Hospital

10822 Garden Grove Blvd.
 Garden Grove, CA 92843
 (Fax) 714-537-6012 ggpthospital.com
 Tel: 714-537-8800

Bill for Services

DATE	INV. NUM
02/21/21	677961

Michelle Vuong



Acct no.: 123539

Tracy Menichiello, DVM

Qty	Date	Patient	Description	Price	Ext Tx
1	2/21/2021	Whiskey	PS010- Examination/Office Call	\$39.00	\$39.00
1	2/21/2021	Whiskey	IDX31429- D1-Total Health Plus w/CPL	\$198.00	\$198.00
1	2/21/2021	Whiskey	IDX910- UA-Urinalysis	\$71.00	\$71.00
1	2/21/2021	Whiskey	IDX5013- Fecal (Iddex)	\$28.00	\$28.00
1	2/21/2021	Whiskey	DW1000- Deworming(ascarids)	\$22.00	\$22.00
1	2/21/2021	Whiskey	Vx2100- DHLPP-Series Vacc.	\$15.00	\$15.00
1	2/21/2021	Whiskey	Vx3000- Parvovirus-Series Vacc	\$12.50	\$12.50
1	2/21/2021	Whiskey	Vx1800- Coronavirus-Series	\$12.50	\$12.50
1	2/21/2021	Whiskey	Vx1500- Bordetella -Series	\$12.50	\$12.50
1	2/21/2021	Whiskey	Vx2700- Lyme Disease-Series Vacc.	\$25.00	\$25.00
1	2/21/2021	Whiskey	Hw1000- Hazardous Waste	\$7.25	\$7.25
7	2/21/2021	Whiskey	Rx5430- Flagyl (Mctronidazole) 250mg		\$15.25

Subtotal \$458.00

Tax \$0.00

Bill total \$458.00

Prev balance \$0.00

Payment (\$458.00)

NEW BALANCE \$0.00

Pmnt 1: Visa Amt: (\$458.00)
 Note: Visa 4300 th

Pmnt 2: Amt: \$0.00
 Note:

Thank you for choosing Garden Grove Dog and Cat Hospital for your pets health care needs. Your confidence in us is appreciated. If you have any questions or concerns regarding your pet please call 714-537-8800.

We appreciate your comments. See the Client Satisfaction Survey on our website at ggpthospital.com
 Garden Grove Dog and Cat Hospital is a full service veterinary clinic, but is not a 24 hour facility. The continuous presence of professional personnel may not be provided after our regular business hours.

Signs that may indicate PAIN in your pet:

APP193

000011

Garden Grove Dog & Cat Hospital

10822 Garden Grove Blvd.
 Garden Grove, CA 92843
 (Fax) 714-537-6012 ggpethospital.com
 Tel: 714-537-8800

Bill for Services

DATE	INV. NUM
02/22/21	678088

Michelle Vuong



Acct no.: 123539
 Tracy Menichiello, DVM

Qty	Date	Patient	Description	Price	Ext Tx
20	2/22/2021	Whiskey	Rx2750- Clavamox 250mg (amox-clavul		\$55.00
1	2/22/2021	Whiskey	IDX4035- Urine Culture MIC	\$152.25	\$152.25

Subtotal \$207.25

Tax \$0.00

Bill total \$207.25

Prev balance \$0.00

Payment (\$207.25)

NEW BALANCE \$0.00

Pmnt 1: Visa Amt: (\$207.25)
 Note: Visa4300 hc

Pmnt 2: Amt: \$0.00
 Note:

Thank you for choosing Garden Grove Dog and Cat Hospital for your pets health care needs. Your confidence in us is appreciated. If you have any questions or concerns regarding your pet please call 714-537-8800.

We appreciate your comments. See the Client Satisfaction Survey on our website at ggpethospital.com Garden Grove Dog and Cat Hospital is a full service veterinary clinic, but is not a 24 hour facility. The continuous presence of professional personnel may not be provided after our regular business hours.

Signs that may indicate PAIN in your pet:

NORMAL- NO PAIN - Asleep or interested in surroundings, Comfortable, Quiet, Normal heart rate/ respiration

MILD PAIN - Depressed, Unsettled/Restless, Crying (but responsive to voice) Increased heart rate and respiration

MODERATE - SEVERE PAIN - Extreme agitation/Thrashing, Continuous crying, and Rapid heart rate/ respiration

Other signs may include self-mutilation, anorexia, pacing, hiding, aggression and abnormal behavioral changes.

APP194

000012

Garden Grove Dog & Cat Hospital

10822 Garden Grove Blvd.
 Garden Grove, CA 92843
 (Fax) 714-537-6012 ggpethospital.com
 Tel: 714-537-8800

Bill for Services

DATE	INV. NUM
12/03/19	564742

Michelle Vuong



Acct no.: 123539
 Mark D. Malo, DVM

Qty	Date	Patient	Description	Price	Ext	Tx
1	12/3/2019	Madeline	PS025- Exam @ No Charge	\$0.00	\$0.00	
1	12/3/2019	Madeline	Xr4952- Xray Orthopedic (3 view)	\$226.25	\$226.25	
1	12/3/2019	Madeline	Hw1000- Hazardous Waste	\$7.25	\$7.25	
1	12/3/2019	Madeline	*Eye- Dr. Esson - VOC note	\$0.00	\$0.00	
1	12/3/2019	Madeline	IDX5013- Fecal (Idexx)	\$26.50	\$26.50	
1	12/3/2019	Madeline	RP5550- Missing Link K9 + Joint Suppor	\$38.00	\$38.00	tx

Subtotal \$298.00

Tax \$3.33

Bill total \$301.33

Prev balance \$0.00

Payment (\$301.33)

NEW BALANCE \$0.00

Pmnt 1: Visa Amt: (\$301.33)
 Note: Visa jb 3865

Pmnt 2: Amt: \$0.00
 Note:

Thank you for choosing Garden Grove Dog and Cat Hospital for your pets health care needs. Your confidence in us is appreciated. If you have any questions or concerns regarding your pet please call 714-537-8800.

We appreciate your comments. See the Client Satisfaction Survey on our website at ggpethospital.com
 Garden Grove Dog and Cat Hospital is a full service veterinary clinic, but is not a 24 hour facility. The continuous presence of professional personnel may not be provided after our regular business hours.

Signs that may indicate PAIN in your pet:

NORMAL- NO PAIN - Asleep or interested in surroundings, Comfortable, Quiet, Normal heart rate/
 respiration

MILD PAIN - Depressed, Unsettled/Restless, Crying (but responsive to voice) Increased heart rate and
 respiration

MODERATE - SEVERE PAIN – Extreme agitation/Thrashing, Continuous crying, and Rapid heart rate/

APP195

000013

Garden Grove Dog & Cat Hospital

10822 Garden Grove Blvd.
 Garden Grove, CA 92843
 (Fax) 714-537-6012 ggpthospital.com
 Tel: 714-537-8800

Bill for Services

DATE	INV. NUM
02/21/21	677961

Michelle Vuong



Acct no.: 123539

Tracy Menichiello, DVM

Qty	Date	Patient	Description	Price	Ext Tx
1	2/21/2021	Whiskey	PS010- Examination/Office Call	\$39.00	\$39.00
1	2/21/2021	Whiskey	IDX31429- D1-Total Health Plus w/CPL	\$198.00	\$198.00
1	2/21/2021	Whiskey	IDX910- UA-Urinalysis	\$71.00	\$71.00
1	2/21/2021	Whiskey	IDX5013- Fecal (Iddex)	\$28.00	\$28.00
1	2/21/2021	Whiskey	DW1000- Deworming(ascarids)	\$22.00	\$22.00
1	2/21/2021	Whiskey	Vx2100- DHLPP-Series Vacc.	\$15.00	\$15.00
1	2/21/2021	Whiskey	Vx3000- Parvovirus-Series Vacc	\$12.50	\$12.50
1	2/21/2021	Whiskey	Vx1800- Coronavirus-Series	\$12.50	\$12.50
1	2/21/2021	Whiskey	Vx1500- Bordetella -Series	\$12.50	\$12.50
1	2/21/2021	Whiskey	Vx2700- Lyme Disease-Series Vacc.	\$25.00	\$25.00
1	2/21/2021	Whiskey	Hw1000- Hazardous Waste	\$7.25	\$7.25
7	2/21/2021	Whiskey	Rx5430- Flagyl (Mctronidazole) 250mg		\$15.25

Subtotal \$458.00

Tax \$0.00

Bill total \$458.00

Prev balance \$0.00

Payment (\$458.00)

NEW BALANCE \$0.00

Pmnt 1: Visa Amt: (\$458.00)
 Note: Visa 4300 th

Pmnt 2: Amt: \$0.00
 Note:

Thank you for choosing Garden Grove Dog and Cat Hospital for your pets health care needs. Your confidence in us is appreciated. If you have any questions or concerns regarding your pet please call 714-537-8800.

We appreciate your comments. See the Client Satisfaction Survey on our website at ggpthospital.com
 Garden Grove Dog and Cat Hospital is a full service veterinary clinic, but is not a 24 hour facility. The continuous presence of professional personnel may not be provided after our regular business hours.

Signs that may indicate PAIN in your pet:

APP196

000014



WHISKEY VUONG

PET OWNER: **VUONG**
SPECIES: **Canine**
BREED:
GENDER: **Male**
AGE: **3 Months**
PATIENT ID: **111770**

Garden Grove Dog & Cat Hosp.
Garden Grove, CA 92843-1202
ACCOUNT #: **93786**
ATTENDING VET: **Tracy Menichiello, DVM**

LAB ID: **7803875483**
ORDER ID: **149041157**
COLLECTION DATE: **2/20/21**
DATE OF RECEIPT: **2/21/21**
DATE OF RESULT: **2/22/21**

IDEXX Services: **Urinalysis Completion, Total Health™ Plus with Free T4, Spec cPL® (Canine), and T3**

Hematology




























2/21/21 (Order Received)
2/22/21 3:13 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE	
RBC	6.23	5.39 - 8.70 M/ μ L	
Hematocrit	40.4	38.3 - 56.5 %	
Hemoglobin	13.5	13.4 - 20.7 g/dL	
MCV	65	59 - 76 fL	
MCH	21.7	21.9 - 26.1 pg	L
MCHC	33.4	32.6 - 39.2 g/dL	
% Reticulocyte	1.1	%	
Reticulocytes	69	10 - 110 K/ μ L	
Reticulocyte Hemoglobin	24.8	22.3 - 29.6 pg	
WBC	15.7	4.9 - 17.6 K/ μ L	
% Neutrophils	54.5	%	
% Lymphocytes	26.7	%	
% Monocytes	12.7	%	
% Eosinophils	4.8	%	
% Basophils	1.3	%	
Neutrophils	8.557	2.94 - 12.67 K/ μ L	
Lymphocytes	4.192	1.06 - 4.95 K/ μ L	
Monocytes	1.994	0.13 - 1.15 K/ μ L	H
Eosinophils	0.754	0.07 - 1.49 K/ μ L	
Basophils	0.204	0 - 0.1 K/ μ L	H
Platelets	425	143 - 448 K/ μ L	

^a AUTOMATED CBC

Chemistry

2/21/21 (Order Received)
2/22/21 3:13 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE	
Glucose	61	63 - 114 mg/dL	L 
IDEXX SDMA ^a	19	0 - 14 µg/dL	H 
Creatinine	0.5	0.5 - 1.5 mg/dL	
BUN	15	9 - 31 mg/dL	
BUN: Creatinine Ratio	30.0		
Phosphorus	9.7	2.5 - 6.1 mg/dL	H 
Calcium	12.0	8.4 - 11.8 mg/dL	H 
Sodium	142	142 - 152 mmol/L	
Potassium	6.2	4.0 - 5.4 mmol/L	H 
Na: K Ratio	23	28 - 37	L 
Chloride	105	108 - 119 mmol/L	L 
TCO2 (Bicarbonate)	22	13 - 27 mmol/L	
Anion Gap	21	11 - 26 mmol/L	
Total Protein	5.3	5.5 - 7.5 g/dL	L 
Albumin	2.8	2.7 - 3.9 g/dL	
Globulin	2.5	2.4 - 4.0 g/dL	
Albumin: Globulin Ratio	1.1	0.7 - 1.5	
ALT	25	18 - 121 U/L	
AST	31	16 - 55 U/L	
ALP	149	5 - 160 U/L	
GGT	3	0 - 13 U/L	
Bilirubin - Total	0.1	0.0 - 0.3 mg/dL	
Bilirubin - Unconjugated	0.0	0.0 - 0.2 mg/dL	
Bilirubin - Conjugated	<0.1	0.0 - 0.1 mg/dL	
Cholesterol	207	131 - 345 mg/dL	
Triglyceride	62	20 - 150 mg/dL	
Amylase	454	337 - 1,469 U/L	
Lipase ^b	39	0 - 250 U/L	



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 2/22/21

LAB ID: 7803875483

Chemistry (continued)

TEST	RESULT	REFERENCE VALUE	
Creatine Kinase	578	10 - 200 U/L	H <input type="text"/>
Hemolysis Index	^c N		
Lipemia Index	^d N		
Spec cPL	In Process		

^a SDMA is increased and creatinine is within the reference interval: likely impaired GFR and kidney function. Recommended next step: evaluate complete urinalysis. For information on recommended actions visit: www.idexx.com/sdmaalgorithm.

^b Please note: the canine and feline reference intervals for lipase have been updated effective May 26, 2020 to reflect current IDEXX testing.

^c Index of N, 1+, 2+ exhibits no significant effect on chemistry values.

^d Index of N, 1+, 2+ exhibits no significant effect on chemistry values.

Urinalysis



2/21/21 (Order Received)
2/22/21 3:13 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE
Collection	CATHERIZED	
Color	Yellow	
Clarity	CLOUDY	
Specific Gravity	1.027	
pH	6.5	
Urine Protein	NEGATIVE	
Glucose	NEGATIVE	
Ketones	NEGATIVE	
Blood / Hemoglobin	TRACE	
Bilirubin	NEGATIVE	
Urobilinogen	NORMAL	



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 2/22/21

LAB ID: 7803875483

Urinalysis (continued)

TEST	RESULT	REFERENCE VALUE
White Blood Cells	20-30	0 - 5 HPF
Red Blood Cells	15-20	HPF
Bacteria	^a MARKED >40/HPF, RODS AND COCCI PRESENT	
Epithelial Cells	3+ (6-10)/HPF	
Mucus	NONE SEEN	
Casts	NONE SEEN	
Crystals	OCCASIONAL AMMONIUM MG PHOSPHATE (0-1)/HPF	
Other	AMORPHOUS DEBRIS	

^a If clinical signs of urinary tract disease, other suggestive laboratory findings, or predisposing medical conditions are present, consider urine culture for definitive identification of bacteria and antibiotic susceptibility. For additional guidance on bacteriuria, please see www.idexx.com/UrineBacteria.

Endocrinology



2/21/21 (Order Received)
 2/22/21 3:13 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE	
Total T4	^a 3.3	1.0 - 4.0 µg/dL	
Total T3	63	55 - 150 ng/dL	
Free T4 (ng/dL)	3.1	0.6 - 3.7 ng/dL	
Free T4 (pmol/L)	^b 39.9	7.7 - 47.6 pmol/L	

^a Dogs with no clinical signs of hypothyroidism and results within the reference interval are likely euthyroid. For dogs on thyroid supplement, recommended therapeutic levels are 2.1-3.4 ug/dL.

^b In a dog with clinical signs of hypothyroidism, a decreased free T4 supports the diagnosis of hypothyroidism, and a normal free T4 indicates the dog is likely euthyroid.

Dogs with a significant nonthyroidal illness can have a low free T4 and it is recommended to reevaluate for hypothyroidism, if clinically indicated, once the nonthyroidal illness has resolved. If testing cannot be delayed in a sick dog, consider a free T4 by equilibrium dialysis (test code 8499; add-on 8509), or preferably a thyroid confirmation panel (free T4ED, cTSH and thyroglobulin autoantibody; test code 3017; add-on 3018) to provide additional information about



WHISKEY VUONG

PET OWNER: **VUONG**

DATE OF RESULT: **2/22/21**

LAB ID: **7803875483**

Endocrinology (continued)

the dog's thyroid status.



University Veterinary Center

www.UVCVET.com
1716 West Glenoaks Avenue
Anaheim, CA 92801
(714) 551-9911

Michelle Vuong

Client ID: 4469

Invoice #: 46308

Date: 4/5/2021

Patient ID: 9628	Weight: 51.50 pounds
Patient Name: Whiskey	Birthday: 11/04/2020
Species: Canine	Sex: Male
Breed: Shepherd, German	

	<u>Description</u>	<u>Staff Name</u>	<u>Quantity</u>	<u>Total</u>
4/5/2021	Exam & Office Visit (Drop Off)	Dr. Ashkan Hakhamian	1.00	\$45.00
	18509999 IDEXX Adult Screen CBC		1.00	\$146.00
	=>Includes Urinalysis (Previous UTI)		1.00	\$0.00
	24639 IDEXX Fecal Panel Comprehensive		1.00	\$51.98
	Nexgard Single Dose (24.1-60 lbs)		1.00	\$27.72
	Additional Rec' Based On Lab Results		1.00	\$0.00
	Thank you for visiting UVC!		1.00	\$0.00
		Patient Subtotal:		\$270.70

Reminder

04/05/2022 Exam & Office Visit (Wellness)

Invoice Total:	\$270.70
Total:	\$270.70
Balance Due:	\$270.70
Previous Balance:	\$0.00
Balance Due:	\$270.70
Visa:	(\$270.70)
Less Payment:	(\$270.70)
Balance Due:	\$0.00

Scheduled Appointments:

Appt. for Madeline on 4/9/2021 at 09:30 am.

Our doctors and staff thank you for choosing our Hospital. We appreciate your business and enjoy providing care for your pets. Thank You.

APP202

000020



WHISKEY VUONG

PET OWNER: **VUONG**
SPECIES: **Canine**
BREED: **German Shepherd**
GENDER: **Male**
AGE: **5 Months**
PATIENT ID: **9628**

UNIVERSITY VETERINARY CENTER
1716 W. GLENOAKS AVE
ANAHEIM, CA 92801
714-551-9911
ACCOUNT #: **6550**
ATTENDING VET: **Hakhamian, Ashkan (33)**

LAB ID: **7804051680**
ORDER ID: **151574351**
COLLECTION DATE: **4/4/21**
DATE OF RECEIPT: **4/6/21**
DATE OF RESULT: **4/6/21**

IDEXX Services: **Adult Screen, Fecal Dx® Profile with Giardia**

Hematology

4/6/21 (Order Received)
4/6/21 4:10 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE	
RBC	5.62	5.39 - 8.70 M/ μ L	
Hematocrit	37.3	38.3 - 56.5 %	L
Hemoglobin	12.5	13.4 - 20.7 g/dL	L
MCV	66	59 - 76 fL	
MCH	22.2	21.9 - 26.1 pg	
MCHC	33.5	32.6 - 39.2 g/dL	
% Reticulocyte	2.3	%	
Reticulocytes	^a 129	10 - 110 K/ μ L	H
Reticulocyte Hemoglobin	25.7	22.3 - 29.6 pg	
WBC	15.3	4.9 - 17.6 K/ μ L	
% Neutrophils	58.3	%	
% Lymphocytes	29.2	%	
% Monocytes	9.7	%	
% Eosinophils	2.5	%	
% Basophils	0.3	%	
Neutrophils	8.92	2.94 - 12.67 K/ μ L	
Lymphocytes	4.468	1.06 - 4.95 K/ μ L	
Monocytes	1.484	0.13 - 1.15 K/ μ L	H
Eosinophils	0.383	0.07 - 1.49 K/ μ L	
Basophils	^b 0.046	0 - 0.1 K/ μ L	
Platelets	290	143 - 448 K/ μ L	

^a The appropriateness of the regenerative response should be evaluated considering the degree of anemia and reticulocytosis (see guidelines below).

Degree of bone marrow response (reticulocytes K/ μ L):
Mild 110-150
Moderate 150-300
Marked >300



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 4/6/21

LAB ID: 7804051680

Hematology (continued)

View the VetConnect Plus Differentials for additional information.

b AUTOMATED CBC

Chemistry



4/6/21 (Order Received)
4/6/21 4:10 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE	
Glucose	105	63 - 114 mg/dL	
IDEXX SDMA ^a	16	0 - 14 µg/dL	H
Creatinine	0.5	0.5 - 1.5 mg/dL	
BUN	16	9 - 31 mg/dL	
BUN: Creatinine Ratio	32.0		
Phosphorus	10.7	2.5 - 6.1 mg/dL	H
Calcium	11.3	8.4 - 11.8 mg/dL	
Sodium	147	142 - 152 mmol/L	
Potassium	5.5	4.0 - 5.4 mmol/L	H
Na: K Ratio	27	28 - 37	L
Chloride	112	108 - 119 mmol/L	
TCO2 (Bicarbonate)	24	13 - 27 mmol/L	
Anion Gap	17	11 - 26 mmol/L	
Total Protein	5.5	5.5 - 7.5 g/dL	
Albumin	2.8	2.7 - 3.9 g/dL	
Globulin	2.7	2.4 - 4.0 g/dL	
Albumin: Globulin Ratio	1.0	0.7 - 1.5	
ALT	20	18 - 121 U/L	
AST	25	16 - 55 U/L	
ALP	107	5 - 160 U/L	
GGT	2	0 - 13 U/L	
Bilirubin - Total	0.1	0.0 - 0.3 mg/dL	
Bilirubin - Unconjugated	0.0	0.0 - 0.2 mg/dL	



WHISKEY VUONG

PET OWNER: **VUONG**

DATE OF RESULT: **4/6/21**

LAB ID: 7804051680

Chemistry (continued)

TEST	RESULT	REFERENCE VALUE	
Bilirubin - Conjugated	<0.1	0.0 - 0.1 mg/dL	
Cholesterol	204	131 - 345 mg/dL	
Creatine Kinase	219	10 - 200 U/L	H
Hemolysis Index	^b N		
Lipemia Index	^c N		

^a SDMA is increased and creatinine is within the reference interval: likely impaired GFR and kidney function. Recommended next step: evaluate complete urinalysis. For information on recommended actions visit: www.idexx.com/sdmaalgorithm.

^b Index of N, 1+, 2+ exhibits no significant effect on chemistry values.

^c Index of N, 1+, 2+ exhibits no significant effect on chemistry values.

Urinalysis



4/6/21 (Order Received)
4/6/21 4:10 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE
Collection	CYSTOCENTESIS	
Color	Yellow	
Clarity	CLOUDY	
Specific Gravity	1.024	
pH	8.0	
Urine Protein	TRACE	
Glucose	NEGATIVE	
Ketones	NEGATIVE	
Blood / Hemoglobin	TRACE	
Bilirubin	NEGATIVE	
Urobilinogen	NORMAL	
White Blood Cells	6-10	0 - 5 HPF



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 4/6/21

LAB ID: 7804051680

Urinalysis (continued)

TEST	RESULT	REFERENCE VALUE
Red Blood Cells	2-5	HPF
Bacteria	^a MODERATE COCCI 9-40/HPF	
Epithelial Cells	1+ (1-2)/HPF	
Mucus	NONE SEEN	
Casts	NONE SEEN	
Crystals	NONE SEEN	

^a If clinical signs of urinary tract disease, other suggestive laboratory findings, or predisposing medical conditions are present, consider urine culture for definitive identification of bacteria and antibiotic susceptibility. For additional guidance on bacteriuria, please see www.idexx.com/UrineBacteria.

Parasitology



4/6/21 (Order Received)
4/6/21 4:10 AM (Last Updated)

TEST	RESULT
Ova & Parasites - Zinc Sulfate Centrifugation	Toxascaris leonina ova present, few (3-10)
Giardia Antigen	POSITIVE
Hookworm Antigen	NEGATIVE
Whipworm Antigen	NEGATIVE
Roundworm Antigen	^a NEGATIVE

^a The IDEXX Fecal Dx antigen tests detect worm antigen and a positive indicates infection. Antigen-positive and egg-negative specimens can be seen during the pre-patent period, with single sex infections and due to intermittent egg shedding. Identification of eggs microscopically in antigen-negative specimens may be due to ingestion of infected feces (coprophagy) or because the amount of antigen is below the level of detection. Treatment should be considered for patients positive by either antigen or egg-detection. In cases of acute or chronic diarrhea also consider testing for viral, bacterial and protozoal infectious agents using RealPCR (canine diarrhea panel: test code 2625; feline diarrhea panel: test code 2627).



University Veterinary Center

www.UVCVET.com
1716 West Glenoaks Avenue
Anaheim, CA 92801
(714) 551-9911

Michelle Vuong

Client ID: 4469

Invoice #: 46442

Date: 4/8/2021

Patient ID: 9628 Weight: 51.50 pounds
Patient Name: Whiskey Birthday: 11/04/2020
Species: Canine Sex: Male
Breed: Shepherd, German

Table with 5 columns: Date, Description, Staff Name, Quantity, Total. Includes items like 4035 Urine Culture & MIC, Enrofloxacin Tablets, Metronidazole Tablets, Panacur Granules, and Fecal Cup To Go Home w/ Client.

Patient Subtotal: \$271.88

Reminder

04/05/2022 Exam & Office Visit (Wellness)

Invoice Total: \$271.88
Total: \$271.88
Balance Due: \$271.88
Previous Balance: \$0.00
Balance Due: \$271.88
Visa: (\$271.88)
Less Payment: (\$271.88)
Balance Due: \$0.00

Scheduled Appointments:

- Appt. for Madeline on 4/9/2021 at 09:30 am.
Appt. for Coconut on 6/7/2021 at 09:30 am.
Appt. for Coconut on 6/15/2021 at 09:00 am.
Appt. for Coconut on 6/15/2021 at 12:00 pm.

Our doctors and staff thank you for choosing our Hospital. We appreciate your business and enjoy providing care for your pets. Thank You.



WHISKEY VUONG

PET OWNER: **VUONG**
SPECIES: **Canine**
BREED: **German Shepherd**
GENDER: **Male**
AGE: **5 Months**
PATIENT ID: **9628**

UNIVERSITY VETERINARY CENTER
1716 W. GLENOAKS AVE
ANAHEIM, CA 92801
714-551-9911
ACCOUNT #: **6550**
ATTENDING VET: **Hakhamian, Ashkan (33)**

LAB ID: **7804051680**
ORDER ID: **151574351**
COLLECTION DATE: **4/4/21**
DATE OF RECEIPT: **4/6/21**
DATE OF RESULT: **4/10/21**

IDEXX Services: **Urine Culture and MIC Susceptibility*, Adult Screen, Fecal Dx® Profile with Giardia**

Hematology

4/6/21 (Order Received)
4/10/21 10:50 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE	
RBC	5.62	5.39 - 8.70 M/ μ L	
Hematocrit	37.3	38.3 - 56.5 %	L
Hemoglobin	12.5	13.4 - 20.7 g/dL	L
MCV	66	59 - 76 fL	
MCH	22.2	21.9 - 26.1 pg	
MCHC	33.5	32.6 - 39.2 g/dL	
% Reticulocyte	2.3	%	
Reticulocytes	^a 129	10 - 110 K/ μ L	H
Reticulocyte Hemoglobin	25.7	22.3 - 29.6 pg	
WBC	15.3	4.9 - 17.6 K/ μ L	
% Neutrophils	58.3	%	
% Lymphocytes	29.2	%	
% Monocytes	9.7	%	
% Eosinophils	2.5	%	
% Basophils	0.3	%	
Neutrophils	8.92	2.94 - 12.67 K/ μ L	
Lymphocytes	4.468	1.06 - 4.95 K/ μ L	
Monocytes	1.484	0.13 - 1.15 K/ μ L	H
Eosinophils	0.383	0.07 - 1.49 K/ μ L	
Basophils	^b 0.046	0 - 0.1 K/ μ L	
Platelets	290	143 - 448 K/ μ L	

^a The appropriateness of the regenerative response should be evaluated considering the degree of anemia and reticulocytosis (see guidelines below).

Degree of bone marrow response (reticulocytes K/ μ L):
Mild 110-150
Moderate 150-300
Marked >300



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 4/10/21

LAB ID: 7804051680

Hematology (continued)

View the VetConnect Plus Differentials for additional information.

b AUTOMATED CBC

Chemistry



4/6/21 (Order Received)
4/10/21 10:50 AM (Last Updated)

Table with 4 columns: TEST, RESULT, REFERENCE VALUE, and a graphical bar chart. Rows include Glucose, IDEXX SDMA, Creatinine, BUN, BUN: Creatinine Ratio, Phosphorus, Calcium, Sodium, Potassium, Na: K Ratio, Chloride, TCO2 (Bicarbonate), Anion Gap, Total Protein, Albumin, Globulin, Albumin: Globulin Ratio, ALT, AST, ALP, GGT, Bilirubin - Total, and Bilirubin - Unconjugated.



WHISKEY VUONG

PET OWNER: **VUONG**

DATE OF RESULT: **4/10/21**

LAB ID: 7804051680

Chemistry (continued)

TEST	RESULT	REFERENCE VALUE	
Bilirubin - Conjugated	<0.1	0.0 - 0.1 mg/dL	
Cholesterol	204	131 - 345 mg/dL	
Creatine Kinase	219	10 - 200 U/L	
Hemolysis Index	^b N		
Lipemia Index	^c N		

^a SDMA is increased and creatinine is within the reference interval: likely impaired GFR and kidney function. Recommended next step: evaluate complete urinalysis. For information on recommended actions visit: www.idexx.com/sdmaalgorithm.

^b Index of N, 1+, 2+ exhibits no significant effect on chemistry values.

^c Index of N, 1+, 2+ exhibits no significant effect on chemistry values.

Urinalysis



4/6/21 (Order Received)
4/10/21 10:50 AM (Last Updated)

TEST	RESULT	REFERENCE VALUE
Collection	CYSTOCENTESIS	
Color	Yellow	
Clarity	CLOUDY	
Specific Gravity	1.024	
pH	8.0	
Urine Protein	TRACE	
Glucose	NEGATIVE	
Ketones	NEGATIVE	
Blood / Hemoglobin	TRACE	
Bilirubin	NEGATIVE	
Urobilinogen	NORMAL	
White Blood Cells	6-10	0 - 5 HPF



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 4/10/21

LAB ID: 7804051680

Urinalysis (continued)

TEST	RESULT	REFERENCE VALUE
Red Blood Cells	2-5	HPF
Bacteria	^a MODERATE COCCI	9-40/HPF
Epithelial Cells	1+ (1-2)/HPF	
Mucus	NONE SEEN	
Casts	NONE SEEN	
Crystals	NONE SEEN	

^a If clinical signs of urinary tract disease, other suggestive laboratory findings, or predisposing medical conditions are present, consider urine culture for definitive identification of bacteria and antibiotic susceptibility. For additional guidance on bacteriuria, please see www.idexx.com/UrineBacteria.

Microbiology

4/6/21 (Order Received)
4/10/21 10:50 AM (Last Updated)

Source: URINE

Culture Results: Status: FINAL

Isolate 1: E. coli - >100,000 CFU per ml

	Isolate 1	MIC
Cefotaxime	S	
Amoxicillin	R	>=32
Amoxicillin-Clavulanic Acid	S	4
Cephalexin	S	8
Cefpodoxime	S	<=0.25
Cefovecin	S	<=0.5
Ceftazidime	S	<=0.12
Ceftiofur	S	<=1
Imipenem	S	<=0.25
Amikacin	S	<=2
Gentamicin	S	<=1
Ciprofloxacin	S	<=0.06
Enrofloxacin	S	<=0.12
Marbofloxacin	S	<=0.5
Doxycycline	R	>=16
Nitrofurantoin	S	<=16
Chloramphenicol	S	4
Trimethoprim/Sulphate	R	>=320

INTERPRETATION KEY for Antibiotic Susceptibility Results (when performed)
 S = Sensitive. Organism is inhibited by usual recommended dose.
 I = Intermediate. Organism is inhibited only by the maximum recommended dose.
 R = Resistant. Organism is resistant to the maximum recommended dose.
 These standards have been established by the Clinical and Laboratory Standards Institute (CLSI).
 TP = To Follow. Susceptibility testing for this antibiotic is performed by Kirby-Bauer and results will follow shortly.

N/I (not indicated) will be reported and/or MIC data may be left blank and not reported if:

Microbiology (continued)

a) the growth requirements of the organism require the sensitivity testing to be performed by another method
 b) interpretive criteria are not available from CLSI (in this case, recommended antibiotics will be reported based on clinical efficacy studies)
 c) certain antibiotics are not available due to limitations of our commercial laboratory system; or
 d) the drug is known to be clinically ineffective against the organism regardless of in vitro results.
 If "N/I" is listed for ALL antibiotics for a specific isolate, susceptibility testing was not performed for that organism. Please refer to the comment associated with the organism for recommendations if applicable.

For more information on Minimum Inhibitory Concentration (MIC) please see the "Microbiology Guide to Interpreting Minimum Inhibitory Concentration (MIC)" section of the IDEXX Reference Laboratories Directory of Services or visit www.idexx.com/MIC.

Parasitology**4/6/21** (Order Received)**4/10/21 10:50 AM** (Last Updated)

TEST	RESULT
Ova & Parasites - Zinc Sulfate Centrifugation	Toxascaris leonina ova present, few (3-10)
Giardia Antigen	POSITIVE
Hookworm Antigen	NEGATIVE
Whipworm Antigen	NEGATIVE
Roundworm Antigen	^a NEGATIVE

^a The IDEXX Fecal Dx antigen tests detect worm antigen and a positive indicates infection. Antigen-positive and egg-negative specimens can be seen during the pre-patent period, with single sex infections and due to intermittent egg shedding. Identification of eggs microscopically in antigen-negative specimens may be due to ingestion of infected feces (coprophagy) or because the amount of antigen is below the level of detection. Treatment should be considered for patients positive by either antigen or egg-detection. In cases of acute or chronic diarrhea also consider testing for viral, bacterial and protozoal infectious agents using RealPCR (canine diarrhea panel: test code 2625; feline diarrhea panel: test code 2627).

5/10/2021

Chewy.com - Order 1033561076




Questions?
1-800-672-4399
WWW.CHEWY.COM

Final Details for Order #1033561076

Order Placed: Apr 24, 2021
Order Total: \$124.97

Shipped on Apr 24, 2021

Qty	Item	Unit Price	Total
1	Nutramax Dasuquin Joint Health Small/Medium Dog Supplement, Small/Medium Dogs (under 60-lbs), 150 count	\$59.99	\$59.99
1	Trudell Medical International AeroDawg Dog Asthma Aerosol Chamber, Large	\$55.99	\$55.99
Sent To:		Item(s) Subtotal:	\$115.98
Michelle Vuong		Shipping:	\$0.00
		Adjustment Applied:	\$0.00
Shipping Speed:		Total Before Tax:	\$115.98
Flat-Rate Shipping		Sales Tax:	\$8.99
		Shipment Total:	\$124.97

Payment Information

Payment Method:	Item(s) Subtotal:	\$115.98
VISA Last digits: 4300	Shipping:	\$0.00
Billing Address:	Total Before Tax:	\$115.98
Michelle Vuong	Sales Tax:	\$8.99
	Order Total:	\$124.97

If you have any questions regarding your order, please contact customer care at 1-800-672-4399.

To view the status of your order, return to Order Summary.

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University Veterinary Center

www.UVCVET.com
1716 West Glencaks Avenue
Anaheim, CA 92801
(714) 551-9911

Michelle Vuong

Client ID: 4469
Invoice #: 47667
Date: 5/3/2021

Patient ID: 9628 Weight: 51.50 pounds
Patient Name: Whiskey Birthday: 11/04/2020
Species: Canine Sex: Male
Breed: Shepherd, German

Table with 4 columns: Description, Staff Name, Quantity, Total. Row 1: 5/3/2021, 24639 IDEXX Fecal Panel Comprehensive, Dr. Dr. Ash, 1.00, \$51.98. Row 2: Thank you for visiting UVC!, 1.00, \$0.00. Patient Subtotal: \$51.98

Reminder

04/05/2022 Exam & Office Visit (Wellness)

Patient ID: 9627 Weight: 23.00 pounds
Patient Name: Coconut Birthday: 11/15/2018
Species: Canine Sex: Female
Breed: Bulldog, French

Table with 4 columns: Description, Staff Name, Quantity, Total. Row 1: 5/3/2021, 24639 IDEXX Fecal Panel Comprehensive, Dr. Dr. Ash, 1.00, \$51.98. Row 2: Thank you for visiting UVC!, 1.00, \$0.00. Patient Subtotal: \$51.98

Reminder

03/15/2022 Canine DAPPv 1 year
Exam & Office Visit (Wellness)
Bordetella Vaccine Intranasal 1 year

Summary table: Invoice Total: \$103.96, Total: \$103.96, Balance Due: \$103.96, Previous Balance: \$0.00, Balance Due: \$103.96, Visa: (\$103.96), Less Payment: (\$103.96), Balance Due: \$0.00

Scheduled Appointments:

- Appt. for Madeline on 5/10/2021 at 02:30 pm.
Appt. for Coconut on 6/7/2021 at 09:30 am.
Appt. for Madeline on 6/11/2021 at 03:00 pm.
Appt. for Coconut on 6/15/2021 at 09:00 am.

Our doctors and staff thank you for choosing our Hospital. We appreciate your business and enjoy providing care for your pets. Thank You.



WHISKEY VUONG

PET OWNER: **VUONG**
SPECIES: **Canine**
BREED: **German Shepherd**
GENDER: **Male**
AGE: **6 Months**
PATIENT ID: **9628**

UNIVERSITY VETERINARY CENTER
1716 W. GLENOAKS AVE
ANAHEIM, CA 92801
714-551-9911
ACCOUNT #: **6550**
ATTENDING VET: **, Dr. Ash (33)**

LAB ID: **7804175074**
ORDER ID: **153263243**
COLLECTION DATE: **5/2/21**
DATE OF RECEIPT: **5/4/21**
DATE OF RESULT: **5/4/21**

IDEXX Services: **Fecal Dx® Profile with Giardia**

Parasitology



5/4/21 (Order Received)
5/4/21 6:31 AM (Last Updated)

4/6/21

TEST	RESULT	
Ova & Parasites - Zinc Sulfate Centrifugation	Giardia sp. cysts present; moderate (11-30)	Toxascari...
Giardia Antigen	POSITIVE	POSITIVE
Hookworm Antigen	NEGATIVE	NEGATIVE
Whipworm Antigen	NEGATIVE	NEGATIVE
Roundworm Antigen	^a NEGATIVE	NEGATIVE

^a The IDEXX Fecal Dx antigen tests detect worm antigen and a positive indicates infection. Antigen-positive and egg-negative specimens can be seen during the pre-patent period, with single sex infections and due to intermittent egg shedding. Identification of eggs microscopically in antigen-negative specimens may be due to ingestion of infected feces (coprophagy) or because the amount of antigen is below the level of detection. Treatment should be considered for patients positive by either antigen or egg-detection. In cases of acute or chronic diarrhea also consider testing for viral, bacterial and protozoal infectious agents using RealPCR (canine diarrhea panel; test code 2625; feline diarrhea panel; test code 2627).



University Veterinary Center

www.UVCVET.com
1716 West Glenoaks Avenue
Anaheim, CA 92801
(714) 551-9911

Michelle Vuono
[Redacted]

Client ID: 4469
Invoice #: 47835
Date: 5/6/2021

Patient ID:	9628	Weight:	65.00	pounds
Patient Name:	Whiskey	Birthday:	11/04/2020	
Species:	Canine	Sex:	Male	
Breed:	Shepherd, German			

	<u>Description</u>	<u>Staff Name</u>	<u>Quantity</u>	<u>Total</u>
5/5/2021	Panacur Granules 22.2% (50-75#)	Dr. Dr. Ash	2.00	\$70.00
5/6/2021	910 IDEXX Urinalysis		1.00	\$53.70
5/5/2021	Fecal Cup To Go Home w/ Client		1.00	\$0.00
5/6/2021	Thank you for visiting UVC!		1.00	\$0.00
		Patient Subtotal:		\$123.70

Reminder

04/05/2022 Exam & Office Visit (Wellness)

Invoice Total:	\$123.70
Total:	\$123.70
Balance Due:	\$123.70
Previous Balance:	\$0.00
Balance Due:	\$123.70
Visa:	(\$123.70)
Less Payment:	(\$123.70)
Balance Due:	\$0.00

Scheduled Appointments:

- Appt. for Madeline on 5/10/2021 at 02:30 pm.
- Appt. for Coconut on 6/7/2021 at 09:30 am.
- Appt. for Madeline on 6/11/2021 at 03:00 pm.
- Appt. for Coconut on 6/15/2021 at 09:00 am.
- Appt. for Coconut on 6/15/2021 at 12:00 pm.

Our doctors and staff thank you for choosing our Hospital. We appreciate your business and enjoy providing care for your pets. Thank You.



WHISKEY VUONG

PET OWNER: **VUONG**
SPECIES: **Canine**
BREED: **German Shepherd**
GENDER: **Male**
AGE: **6 Months**
PATIENT ID: **9628**

UNIVERSITY VETERINARY CENTER
1716 W. GLENOAKS AVE
ANAHEIM, CA 92801
714-551-9911
ACCOUNT #: **6550**
ATTENDING VET: **, Dr. Ash (33)**

LAB ID: **7804171951**
ORDER ID: **153497286**
COLLECTION DATE: **5/5/21**
DATE OF RECEIPT: **5/6/21**
DATE OF RESULT: **5/8/21**

IDEXX Services: **Urinalysis, Urine Culture and MIC Susceptibility***

Urinalysis



5/6/21 (Order Received)
5/8/21 9:04 PM (Last Updated)

4/6/21

TEST	RESULT	REFERENCE VALUE	
Collection	CYSTOCENTESIS		CYSTOCE...
Color	Yellow		Yellow
Clarity	CLOUDY		CLOUDY
Specific Gravity	1.038		1.024
pH	6.0		8.0
Urine Protein	NEGATIVE		TRACE
Glucose	NEGATIVE		NEGATIVE
Ketones	NEGATIVE		NEGATIVE
Blood / Hemoglobin	2+		TRACE
Bilirubin	NEGATIVE		NEGATIVE
Urobilinogen	NORMAL		NORMAL
White Blood Cells	10-15	0 - 5 HPF	6-10
Red Blood Cells	15-20	HPF	2-5
Bacteria	^a MARKED RODS >40/HPF		MODERATE...
Epithelial Cells	1+ (1-2)/HPF		1+ (1-2)/HPF
Mucus	NONE SEEN		NONE SEEN
Casts	NONE SEEN		NONE SEEN



WHISKEY VUONG

PET OWNER: VUONG

DATE OF RESULT: 5/8/21

LAB ID: 7804171951

Urinalysis (continued)

TEST	RESULT	REFERENCE VALUE
Crystals	NONE SEEN	NONE SEEN

^a If clinical signs of urinary tract disease, other suggestive laboratory findings, or predisposing medical conditions are present, consider urine culture for definitive identification of bacteria and antibiotic susceptibility. For additional guidance on bacteriuria, please see www.idexx.com/UrineBacteria.

Microbiology



5/6/21 (Order Received)
5/8/21 9:04 PM (Last Updated)

Source: ^a In Process

^a ****INTERPRETATION KEY for Antibiotic Susceptibility Results (when performed)****
S = Sensitive. Organism is inhibited by usual recommended dose.
I = Intermediate. Organism is inhibited only by the maximum recommended dose.
R = Resistant. Organism is resistant to the maximum recommended dose.
These standards have been established by the Clinical and Laboratory Standards Institute (CLSI).
TF = To Follow. Susceptibility testing for this antibiotic is performed by Kirby-Bauer and results will follow shortly.

N/I (not indicated) will be reported and/or MIC data may be left blank and not reported if:
a) the growth requirements of the organism require the sensitivity testing to be performed by another method
b) interpretive criteria are not available from CLSI (in this case, recommended antibiotics will be reported based on clinical efficacy studies)
c) certain antibiotics are not available due to limitations of our commercial laboratory system; or
d) the drug is known to be clinically ineffective against the organism regardless of in vitro results
If "N/I" is listed for ALL antibiotics for a specific isolate, susceptibility testing was not performed for that organism. Please refer to the comment associated with the organism for recommendations if applicable.

For more information on Minimum Inhibitory Concentration (MIC) please see the "Microbiology Guide to Interpreting Minimum Inhibitory Concentration (MIC)" section of the IDEXX Reference Laboratories Directory of Services or visit www.idexx.com/MIC.

5/10/2021

Chewy.com - Order 1038932786




Questions?
1-800-672-4399
WWW.CHEWY.COM

Final Details for Order #1038932786

Order Placed: May 8, 2021
Order Total: \$167.94

Shipped on May 9, 2021

Qty	Item	Unit Price	Total
1	Mazuri Tortoise Food, 25-lb bag	\$38.99	\$37.04
1	Nutramax Dasuquin with MSM Joint Health Small/Medium Dog Supplement, Small/Medium Dogs (under 60 lbs), 150 count	\$64.77	\$61.53
2	Nutramax Dasuquin with MSM Soft Chews Joint Health Large Dog Supplement, 84 count	\$38.59	\$55.13

Sent To:	Item(s) Subtotal:	\$181.14
MICHELLE VUONG	Shipping:	\$0.00
	Adjustment Applied:	-\$27.44
Shipping Speed:	Total Before Tax:	\$153.70
Flat-Rate Shipping	Sales Tax:	\$14.24
	Shipment Total:	\$167.94

Payment Information

Payment Method:	Item(s) Subtotal:	\$181.14
VISA Last digits: 	Shipping:	\$0.00
Billing Address:	Spend \$50 Save 25% On Select Items:	-\$18.38
Justin Smith	Autoship & Save - 5% off:	-\$9.06
	Total Before Tax:	\$153.70
	Sales Tax:	\$14.24
	Order Total:	\$167.94

If you have any questions regarding your order, please contact customer care at 1-800-672-4399.
To view the status of your order, return to Order Summary.
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Exhibit 3

APP220

000038

Item	Date	Reason	Cost
1	02/21/21	Initial visit, Vaccinations Blood test 1 , UTI test 1, Fecal test 1 Frequent urination and diarrhea	\$ 458.00
2	02/22/21	Urine culture 1: due to extreme case of UTI Medication for UTI	\$ 207.25
3	02/22/21	Lab results was very abnormal, indication of very unhealthy puppy (items in red)	-
4	04/05/21	Blood test 2, UTI test 2, Fecal test 2 Frequent urination has not stopped and stool still runny	\$ 270.20
5	04/06/21	Lab results show still positive with UTI and positive 2 parasites and blood work abnormal (has anemia and many other issues)	-
6	04/08/21	Urine culture 2: due to extreme UTI Medication for UTI and parasite	\$ 271.88
7	04/10/21	Lab results for culture	-
8	04/24/21	Supplement for joint health due to likelihood of hip dysplasia	\$ 65.00
9	05/03/21	Fecal test 3: Follow-up test for parasite	\$ 51.98
10	05/02/21	Lab results show still positive with 1 of 2 parasites	-
11	05/06/21	UTI test 3: Follow-up retest Medicaion for parasite	\$ 123.70
12	05/08/21	Lab results show UTI has worsened with different bacteria	-
13	05/08/21	Urine culture 3: Worsened UTI	TBD
14	TBD	Medication for UTI	TBD
15	05/08/21	Supplement for joint health due to likelihood of hip dysplasia	\$ 80.00
	TBD	Blood test 3, UTI test 4, Fecal test 4, Medications, Xray: Anticipated follow-up tests due to abnormal symptoms of puppy. Vet has indicated this is extremely abnormal, as the puppy should have been cleared of UTI and parasites by now.	TBD
			\$ 1,528.01

APP221 000039

EXHIBIT 15

(ANIMAL CONTROL REPORT SHOWING ALLA ZORIKOVA'S DOGS
ALWAYS HAD BEEN FOUND HAVING FOOD, WATER, HAVING GOOD HEALTH,
NOT BEING IN DISTRESS)

A20-172252-1 ASSIST/POLICE Priority Level: 3 Total Animals: 20 Animal Type: DOG
Activity Address: LOCKHART RD RED MOUNTAIN
Activity Comment: O-67 87 W/ DEP ALEXANDER. WILL DIRECT TO ADDRESS FOR ASSIST. LOG# BA022.

Caller Information:

Result Codes:

1 RSVLD

Officer: P999067 CHAVEZ Clerk: B4869

Call Date: 08/08/20 02:02 PM
New Date: 08/08/20 02:02 PM
Dispatch Date: 08/08/20 02:30 PM
Working Date: 08/08/20 04:13 PM
Complete Date: 08/08/20 04:21 PM

Memo:

08/17/20 Myself and O-94 MC with the owner and her daughter. The owner drove us to a Government owned spring where they get their water. She then walked us around the property and showed us all the dogs who all had water and shelter. She stated she picks up left over meat from Barstow Country Butcher daily for the dogs food. The address to the property is 1370 Trump Rd, but it does not com eup on the map yet. I took pictures and put them in O-67 folder. H9045/0-85
8/8/20 0-67 arrived to the call and said all dogs had water and shade. 0-67 said all dogs were healthy and normal. He said there were 50+ dogs on the ppty and they all had water and shade in their cages. 0-67 said the dog owner was going to be arrested for 597 due to the Deputy's not viewing water and shade. I told 0-67 we weren't going to impound the dogs today. I told him to make sure the dogs have water and we will return on 8/9 to ensure the dogs still have water and aren't in distress. we hung up the phone. 0-67 called me back asking about under age pups on the ppty. I asked to talk to an Officer on the ppty, the phone was handed to a SGT. I was unable to get his name due to the fact he was so upset we weren't impounding dogs. I listened to him about how he is leaving and didn't care what animal control does or doesn't do. I told 0-67 to post the ppty and impound all under age pups that didn't have a mother. I called 0-67 back to make sure SO knew ACC wouldn't pay for the cost of the dogs or any of the fees that incur. He put me on the phone with officer Parsons, I explained to her Sherriff Dpt will have to pay for all the cost of the dogs. She went on a rant about how she doesn't care she is only there to uphold her officer oath. I was able to explain to her we were not picking up 50+ dogs today and we would return each day to water and feed to ensure none of them go into distress, until we make arrangements to impound all 50+ dogs. B4869

8/8/20 I M/C with S/O and was able to see many dogs in plain view on property. The dogs were all large G. Sheps were in pin with shade cloth. All the G. sheps had shade and shelter all had little water. None of the dogs appear to be in distress and all appear to be healthy and normal, S/O and dog owner gave the dogs water. There were 12 pups unknown which of the female dogs was the mother. Per O-99/ O-90 the pups were to be impounded and the property is to be posted for 24 hr abandonment. I posted the front gate, side gate, and the little house/shack @ 16:20 for 48 G- Sheps per S/O they arrested dog owner for 597 animals in distress. ...pic in O-67 folder.....c3865

8/8/20 directions to the property,: hwy15 north to hwy 58 west, go north on Haper lake Rd for about 6.8 mi. you will then turn left on Hoffman Rd till paved rd. at end of paved rd go right for about 4.1 mi at the pole with blue ribbon go left for 0.1 mil to dirt rd go right for 0.8 mil then left at the red pole the prop will be to your right....c3865

08/09/20 I met with Dep Parson's and we fed and watered the dogs. All of O-67 notices were still up and the dogs were still on the property. I counted at least 63 dogs but they were hiding in the dens so it was hard to get a full count. I posted 7 O-67 notices next to O-67 advising abandonment for the 50+ dogs and 1 chicken. When I was leaving Dep Parsons had someone pull a truck over at Hoffman rd X Hoffman Rd and as I drove down Hoffman Rd to Harper Valley Lake rd and there was a lifted black Dodge Ram 2500 or 3500 with a man and a woman in it followed by a larger white van with German shep stickers on it. I tried to talk to them but they would not speak with me and drove East on Hoffman Rd. I did not get the lic plate numbers for the truck but I did get a partial plate on the van. The first 3 letters were "AKC". I was unable to take pictures as my camera was overheating and not working properly H9045/0-85

08/11/20 I took pictures and noticed a significant amount of dogs were missing and the chicken was gone. O-55/Stevens counted 25 dogs on the property. We impounded 1 dog that was stuck under fencing trying to get shade under a board. When pulling in Lt. Molina noticed goats on the North/East corner/side of the property line. I went to go check and there was a male Nigerian dwarf goat tied with a collar and chain to the ground as well as a Nubian/Alpine mix female goat who was also tied down by a collar and chain. Neither goat had food water or shelter. We put both goats in the truck and gave them water. 25 dogs and 2 goats were impounded in total. Lt Molina was then leaving the property and a white van with German shep stickers and advertising of rescues pulled up. Lt Molina asked why they were there and the woman stated this was the first time she was out here and Lt. Molina took down her lic plate which was "AKC GSD" and there was a phone number on the side of the van "909-297-6217". The woman would not give any more information and drove away. All pictures are in O-67 folder. h9045/0-85

EXHIBIT 16

(MALICIOUS KNOWINGLY FALSE UNLAWFUL POSTS BY BRYAN PEASE

UPON ALLA ZORIKOVA)

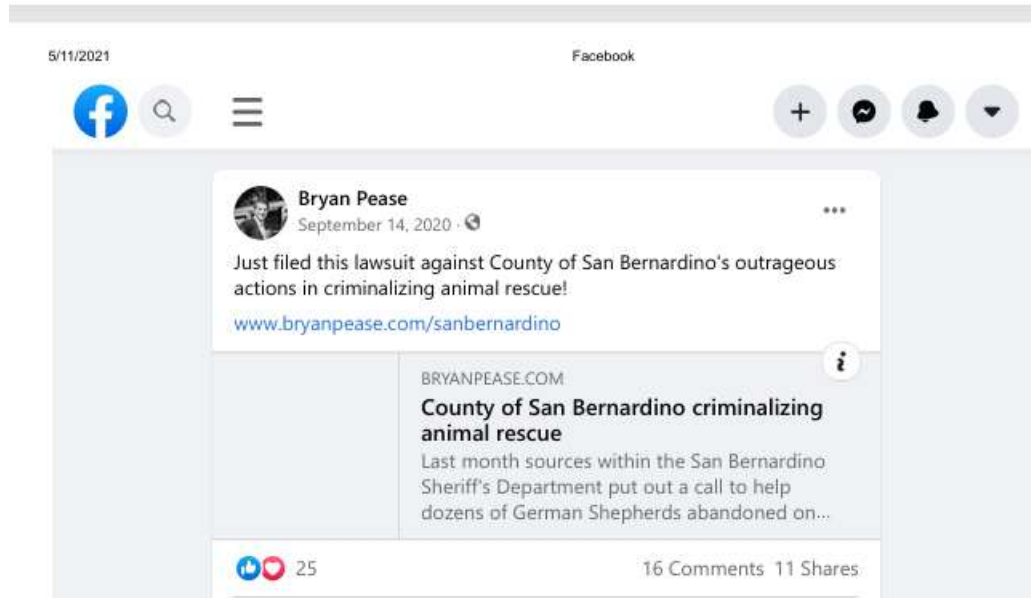


EXHIBIT 17

(BRYAN PEASE UNLAWFULLY DISSEMINATES SEALED ZORIKOVA'S RECORDS. VIOLATION BY BRYAN PEASE CA PENAL CODE 851.92, 851.91)

5/11/2021 Bryan Pease on Twitter: "Just filed this lawsuit against County of San Bernardino's outrageous actions in criminalizing animal rescue! http...



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Bryan Pease
@bryanpease

Just filed this lawsuit against County of San Bernardino's outrageous actions in criminalizing animal rescue!

County of San Bernardino criminalizing animal rescue
bryanpease.com

2:42 PM · Sep 14, 2020 · Twitter Web App

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Relevant people

Bryan Pease
@bryanpease
Nationally recognized environmental & ar attorney

What's happening

World news · LIVE
Death toll climbs as violence between Israeli forces and Hamas escalates
Trending with Netanyahu

#DysonClean
New Dyson V15 Detect vacuum
Promoted by Dyson

Politics · Trending
Arabs

EXHIBIT 18

5/11/2021

Facebook



Bryan Pease

October 5, 2020 · 🌐



Why is [San Bernardino County Sheriff's Department](#) helping a Russian national run an illegal "protection dog" business, abusing & neglecting German Shepherds on land improperly recorded as "Trump Blvd" in middle of nowhere? I'm filing a lawsuit against them today.



BRYANPEASE.COM

San Bernardino County helping animal abusers

Why is San Bernardino County facilitating abuse, neglect, and aban...



Bryan Pease

October 5, 2020 · 🌐

👍 Like



Meet Alla Zorikova, animal abuser being helped by [San Bernardino County Sheriff's Department](#). Click here to see an interactive map of the land she is squatting on to run an illegal "protection dog" business <https://www.bryanpease.com/trumpblvd>





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Tweet

Tweet



Bryan Pease
@bryanpease

Why is @sbcountysheriff helping a Russian national run an illegal "bite dog" business, abusing & neglecting German Shepherds on land improperly recorded as "Trump Blvd" in middle of nowhere? I'm filing a lawsuit against them today.



BUSTED: Von Markgraf / Von Schutz German Shepherds
Why is San Bernardino County facilitating abuse, neglect, and abandonment of dozens of German Shepherds, on land ...
bryanpease.com

1:49 PM · Oct 5, 2020 · Twitter Web App

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Reply

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Relevant people










Bryan Pease
@bryanpease
Nationally recognized environmental & attorney

San Bernardino County Sheriff's Dept
@sbcountysheriff
Official Twitter of the County Sheriff's Dept
This site is not monitored 24/7 in case of an emergency

What's happening

News · Yesterday
Israel launches deadly airstrike on Gaza following Hamas rocket fire on Jerusalem after violence at the city's Al-Aqsa Mosque
Trending with #YangSupportsGerAndrew Yang

#DysonClean
New Dyson V15 Detect vacuum cleaner
Promoted by Dyson

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 -  Lists
 -  Profile
 -  More
- [Tweet](#)

Tweet

 **Bryan Pease**
@bryanpease

Meet Alla Zorikova, animal abuser being helped by @sbcountysheriff. Click here to see an interactive map of land she is squatting on to run an illegal "bite dog" business
bryanpease.com/trumpblvd



1:58 PM · Oct 5, 2020 · Twitter Web App

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2 Retweets **1** Like

 Tweet your reply [Reply](#)

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Relevant people

 **Bryan Pease**
@bryanpease
Nationally recognized environmental & attorney

 **San Bernardino C.**
@sbcountysheriff
Official Twitter of the County Sheriff's Dept
This site is not monitored 24/7 in case of an emergency

What's happening

News · Yesterday

Israel launches deadly airstrike on Gaza following Hamas rocket fire on Jerusalem after violence at the city's Al-Aqsa Mosque
Trending with #YangSupportsGordon · Andrew Yang

#DysonClean
New Dyson V15 Detect vacuum cleaner · Promoted by Dyson

Trending in United States

#GinaGoneWild
4,428 Tweets

Leonardo DiCaprio · Trending

Leonardo DiCaprio
Fans are pointing out that actor DiCaprio looks like Leonardo DiCaprio · New York Post said he looks like

EXHIBIT 18 B

(FABRICATED BY BRYAN PEASE "NOTICE OF VIOLATION")

WHICH IS NOT TRUE NOTICE BUT TAMPERED WITH "NOTICE")



Bryan Pease

October 10, 2020 · 🌐



Update: the illegal, unpermitted German Shepherd "protection dog" business being aided and abetted by San Bernardino County Animal Control and Sheriff's Department, run by Russian nationals on "Trump Blvd," has been ordered by code enforcement to shut down. But, they are still operating. Full details at www.bryanpease.com/trumpblvd

385 N. Arrowhead Ave, First Floor, San Bernardino, CA 92415 | Phone: (909) 884-4056 • Fax: (909) 387-8217

www.SBCounty.gov



**Land Use Services Department
Code Enforcement
NOTICE OF VIOLATION**

TO: ZINAIDA, DMITREEVA ETAL OR		NOTICE DATE: 10/13/2020
JEONG, OLIVIA		
ASSESSOR'S PARCEL NUMBER: 0502-085-75-0000	CASE #: C202002475	
SITUS ADDRESS: 1335 TRUMP BLVD BARSTOW CA 92311		



EXHIBIT 19



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Illegal, unpermitted German Shepherd "bite dog" business supported by @sbsheriff, run by Russian nationals on "Trump Blvd," has been ordered by @SBCounty to shut down, yet is still operating. See bryanpease.com/trumpblvd



6:42 AM · Oct 10, 2020 · Twitter Web App

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Bryan Pease
@bryanpease
Nationally recognized environmental & attorney

SB Sheriff's Office
@sbsheriff
Official Twitter account of Barbara County Sheriff's Office
facebook.com/sant

SBCounty
@SBCounty
The Official Twitter of Bernardino County

What's happening

News · Yesterday
Israel launches deadly airstrike on Gaza following Hamas rocket fire on Jerusalem after violence at the city's Al-Aqsa Mosque
Trending with [#YangSupportsGaza](#) and [Andrew Yang](#)

#DysonClean
New Dyson V15 Detect vacuum cleaner
Promoted by Dyson

Trending in United States
#GinaGoneWild
4,428 Tweets

Leonardo DiCaprio - Trending
Leonardo DiCaprio
Fans are pointing out that actor's...
...
...
...



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Bryan Pease
@bryanpease

Illegal, unpermitted German Shepherd "bite dog" business supported by @sbcountysheriff (correction: NOT @sbsheriff) run by Russian nationals on "Trump Blvd," has been ordered by @SBCounty to shut down, yet is still operating. See bryanpease.com/trumpblvd



8:34 AM · Oct 10, 2020 · Twitter for iPhone

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1 Quote Tweet 1 Like



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Nationally recogniz environmental & ar attorney

San Bernardino C.
@sbcountysheriff
Official Twitter of th County Sheriff's Dej This site is not mon 911 in case of an er

SB Sheriff's Office
@sbsheriff
Official Twitter acco Barbara County She facebook.com/sant.

What's happening

News · Yesterday
Israel launches deadly airst on Gaza following Hamas

5/11/2021

Facebook



Bryan Pease

October 14, 2020 · 🌐



BUSTED: Von Markgraf German Shepherds

I just obtained an injunction to stop Von Markgraf German Shepherds from keeping dozens of dogs in cruel conditions on vacant land, in violation of numerous county codes and state law. The signed order will be posted later today.



BRYANPEASE.COM

San Bernardino Sheriff helping animal abusers

Why is San Bernardino County facilitating abuse, neglect, and aban...

👍❤️ 27

1 Comment 19 Shares



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Tweet

Tweet



Bryan Pease
@bryanpease

BUSTED: Von Markgraf German Shepherds
I just obtained an injunction to stop Von Markgraf German Shepherds from keeping dozens of dogs in cruel conditions on vacant land in San Bernardino County, in violation of numerous county codes and state law.



BUSTED: Von Markgraf / Von Schutz German Shepherds
Why is San Bernardino County facilitating abuse, neglect, and abandonment of dozens of German Shepherds, on land ...
bryanpease.com

10:18 AM · Oct 14, 2020 · Twitter Web App

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Bryan Pease
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Nationally recognized environmental & attorney

What's happening

News · Yesterday

Israel launches deadly airstrike on Gaza following Hamas fire on Jerusalem after violence at the city's Al-Aqsa Mosque

Trending with #YangSupportsG...
Andrew Yang

#DysonClean

New Dyson V15 Detect vacuum
Promoted by Dyson

Trending in United States

#GinaGoneWild
4,428 Tweets

Leonardo DiCaprio - Trending

Leonardo DiCaprio
Fans are pointing out that ac...
DiCaprio looks like Leonardo



Bryan Pease

October 14, 2020 · 🌐



BUSTED: Von Markgraf German Shepherds

I just obtained an injunction to stop Von Markgraf German Shepherds from keeping dozens of dogs in cruel conditions on vacant land, in violation of numerous county codes and state law. The signed order will be posted later today.



BRYANPEASE.COM

San Bernardino Sheriff helping animal abusers

Why is San Bernardino County facilitating abuse, neglect, and aban...

EXHIBIT 20

The illegal actions of San Bernardino Sheriff's Detective Brian Grimm described below appear to have been undertaken in direct retaliation for the filing of this code complaint. Grimm began obtaining warrants based on falsified statements of probable cause and seizing animal rescuers' cellphones and computers on September 3, 2020, just three days after this code complaint was made.



10/5/20

Why is San Bernardino County facilitating abuse, neglect, and abandonment of dozens of German Shepherds at the above location, on land in the middle of nowhere, improperly recorded as "Trump Boulevard," by a squatter to run an illegal "bite dog" business?

Why are San Bernardino County Sheriff's deputies barging into people's homes *in two states* and stealing phones and computers in a misguided effort to locate and return rescued dogs to this illegal business?

Alla Zorikova was arrested on animal cruelty charges on August 8, 2020, and San Bernardino Sheriff's deputies initially called on community members to come rescue dogs

APP150

057

left abandoned on the vacant land that Zorikova was squatting on. But then the County inexplicably dropped the charges and instead began "investigating" animal rescuers as being suspected of "stealing" the dogs.

EXHIBIT 21

Here is what it looked like on the above land when rescuers arrived at the request of San Bernardino Sheriff's deputies:



This is Alla Zorikova, who runs the illegal "bite dog" business, pictured below while stalking an animal rescuer's property:



EXHIBIT 22

The below lawsuit has been submitted for filing in San Bernardino Superior Court. If the PDF does not display properly, [click here to download](#).

To contribute to court costs for these and other efforts, [click here](#). Animal Protection and Rescue League is **volunteer-run, and all attorneys are pro bono**, only being paid from the other side if we win!

EXHIBIT 23

(9th Circuit Opinion Confirming “no charges filed against Alla Zorikova”)

German Shepherd dogs from Alla Zorikova's property.²

1. The district court correctly granted summary judgment to Detective Grimm on plaintiffs' claim of judicial deception.³ To survive summary judgment

¹ Plaintiffs also sued defendant Deputy John Gregory. The district court granted summary judgment to Gregory because "[h]e was not involved in obtaining the search warrants" and "was not present for the searches of the homes of Greiser, Ward, or Gregory." Plaintiffs did not appeal that ruling.

² Zorikova and Olivia Jeong, who was on Zorikova's property when they both were arrested, were subsequently investigated for animal cruelty, though charges were never filed against them.

³ At the district court, plaintiffs alleged that both Detective Grimm and Sergeant Gilmore engaged in judicial deception, but on appeal argue only that Detective Grimm engaged in judicial deception.

EXHIBIT 24

(PEASE FABRICATYES FALSE EVIDENCE, TAMPERING WITH OFFICIAL DOCUMENT)

BUSTED: Von Markgraf / Von Schutz German Shepherds

This is Alla Zorkova, who runs the illegal "attack dog" business, pictured below while stalking an animal rescuer's property



Animal Protection and Rescue League
@april.org

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- Events
- Photos
- Videos
- Community
- Groups
- Reviews
- Posts**

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Like Share Suggest Edits

30W

Animal Protection and Rescue League
October 10, 2020

Update: the illegal, unpermitted German Shepherd "bite dog" business being protected by San Bernardino County Animal Control and Sheriff's Department, run by Russian nationals on "Trump Blvd," has been ordered by code enforcement to shut down. But, they are still operating. Full details at www.bryanpease.com/trumpblvd



385 W. Simonswood Ave, 2nd Floor, San Bernardino, CA 92410 | Phone: (951) 866-4020 • Fax: (951) 861-0217
www.SBCCounty.gov

NOTICE OF VIOLATION

ZHAGDA DMITRIEVA ETAL OR
TO: JENIS OLIVA NOTICE DATE: 10/12/2020

ASSESSOR'S PARCEL NUMBER: 0902-065-75-0000 CASE #: C02002079

SITUS ADDRESS: 1333 TRUMP BLVD BARTON CA 92311

Learn More Send Message

Lucia Rosa Serra
February 15 at 2:58 AM

Hi Hello! First of all, I'd love to thank you for your work. My name is... See More

Squeaky Frost-Messire
January 9 at 5:23 AM

Hi

Pages: Businesses Nonprofit Organization
Animal Protection and Rescue League Photos

See more of Animal Protection and Rescue League on Facebook

Log In OR Create New Account

EXHIBIT 25

(VERIFIED TRUE FACTS ABOUT BRYAN PEASE R5ADFFICAL)

RELATED ORGANIZATIONS

NOTABLE QUOTES

President, Animal Protection & Rescue League; serial duck-farm burglar; spokesman, PETA (1998); jailed (2002) for SHAC-related trespass; arrested (2002) for trespassing at a lab-animal vendor; pleaded “no contest” (2005) to an assault involving a stun gun. Despite his youth, his California law license, and his law-and-order family (his father is the chief civil attorney in the U.S. Attorney’s Office for the Northern District of New York), Bryan Pease already has a history — and a long arrest record — in the animal rights movement. In 1994 the *Syracuse Post-Standard* reported that he was cuffed (at the tender age of 16) along with five other protesters and charged with trespassing at a clothing store that sold fur coats. Since then, Pease’s rap sheet has grown to include convictions for refusing to submit to arrest, fleeing a police officer, and assault.

In September 2005 Pease pleaded “no contest” to assault in a case involving use of a stun gun during a 2004 protest in La Jolla, California. Pease attempted to shock a man at least twice during the protest. After the City Council removed ropes that had blocked a public beach frequented by seals, Pease and others made their own boundary ropes in an attempt to force beachgoers to abandon the sand. On one occasion, Pease used a stun gun on the individual during an altercation.

For the stun-gun assault, Pease was sentenced to probation, 20 days of community service and anger management training. He failed to appear in court for a January 11, 2006 hearing to determine whether he had met the terms of his sentence; a bench warrant was issued for his re-arrest the following day. Court records show that twelve days later, the warrant was rescinded after Pease provided proof that he had, in fact, completed his mandatory anger management training.

Speed up browsing by disabling add-ons.

Choc

Oddly, one of those tactics appears to be abandoning “liberated” animals like garbage. One of the dogs stolen by the ALF was found three months later, wandering the streets of West Palm Beach, Florida. The animal, which was identified through an implanted microchip, was emaciated and starving.

Already an “animal liberation” advocate during his college days at Cornell, Pease urged other activists to wear ski masks to show “solidarity” with the ALF. He and other activists burned a Cornell biomedical professor in effigy during one 1999 protest. Pease’s guilty plea to a charge of reckless endangerment of property also satisfied several other charges — including conspiracy, unlicensed burning, criminal nuisance, and criminal mischief. A year later, a restraining order was issued barring Pease from contacting the science professor.

During a 1998 protest against Oscar Mayer, Pease was described by reporters as a spokesman for People for the Ethical Treatment of Animals. In February 2005 PETA also named him a finalist in its “Sexiest Vegetarian Alive” contest, later removing his picture and biography from the website promoting the contest.

In 2003, Pease met his wife — activist Kate Rogers — when the two were arrested together while protesting an upstate New York crow-shooting competition.

ACTIVIST

to force beachgoers to abandon the sand. On one occasion, Pease used a stun gun on the individual during an altercation.

For the stun-gun assault, Pease was sentenced to probation, 20 days of community service and anger-management training. He failed to appear in court for a January 11, 2006 hearing to determine whether he had met the terms of his sentence; a bench warrant was issued for his re-arrest the following day. Court records show that twelve days later, the warrant was rescinded after Pease provided proof that he had, in fact, completed his mandatory anger management training.

Search

EXHIBIT 26

BRYAN PEASE IMPOSING ECONOMIC HARDSHIP AND DESTROYS ZORIKOVA'S BUSINESS BY KNOWINGLY FALSE MALICIOUS PUBLIC POSTS)

Von Markgraf / Von Schutz / G... x +

bryanpease.com/trumpblvd

Bryan Pease
Environmental Attorney

Join Home San Diego Padres Rodeo Cruelty f t

BUYER BEWARE: German Shepherd Dogs Los Angeles


"German Shepherd Dogs LLC," with website www.germanshepherddogslosangeles.com, is the latest business name created by Alla Zorikova (who also goes by "Sveta," "Vanda," and "Wanda") and Oliva Jeong to sell German Shepherd dogs and puppies they raise in miserable conditions and then sell to unsuspecting customers, sight unseen, through slick marketing.

Customers report they have received dogs who are terrified, emaciated, and filthy after making payment.

Other business names used by these two both in California and Texas have included Von Markgraf German Shepherds, Von Shutz German Shepherds, and Von Noble Hof German Shepherds.


In August 2020, in the middle of a 100-plus degree heat wave in the desert outside of Barstow, California, on a parcel of land at the end of a lengthy dirt road Zorikova had without authorization renamed "Trump Blvd," San Bernardino County Sheriff's deputies arrested Zorikova and Jeong on animal cruelty charges for having over 80 German Shepherds penned up with chicken wire on vacant land with no food, water, or structures. The nearest running water and electricity was not for miles away. When San Bernardino County Animal Control refused to do its job and save the dogs, Sheriff's deputies called on community members to come help, which they did.

Below is a video of the cruel and unlawful conditions in which Sheriff's deputies found the German Shepherds:






← Zorikova in Animal Protection and Res ✕

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 **Animal Protection and Rescue League** · **Follow**
4d · 🌐

Victory in San Bernardino trial! After three days of trial, the Court granted my motion to dismiss animal abuser Alla Zorikova's theft case against animal res... See more

   +2

👍 😄 5 2 comments · 2 shares

👍 Like 🗨 Comment ↗ Share

 **Geny Mac** ⋮

Filters Reset

Posts You've Seen

Most recent

Tagged Location
Anywhere

Date Posted
2023

SHOW RESULTS





Shepherds Dog Club of Los Angeles



Like

Comment

Share

👍👤 5

Most relevant ▾



Michael Wonder

Congratulations [Bryan Pease - Activist](#)

8h Like Reply



Michael Wonder

I'm so glad for everyone. Tina, Casey etc...
If you need help contact me.

7h Like Reply

Comment as Alya Strom





Bryan Pease - Activist

bryan@bryanpease.com

bryanpease.com

Photos

See all photos



Write a comment...



Bryan Pease - Activist

December 14, 2023

Victory in San Bernardino trial! After three days of trial, the Court granted my motion to dismiss animal abuser Alla Zorikova's theft case against animal rescuers. Zorikova had sued animal rescuers for theft for saving and adopting out dozens of German Shepherds left on vacant land in the middle of the desert outside of Barstow, CA in a 104 degree heat wave with no food or water in August 2020. Sheriffs deputies had arrested Zorikova and her daughter, Olivia Jeong, on animal cruelty charges. San Bernardino Animal Control refused to do its job and save the dogs or conduct any follow up investigation requested by DA, so criminal charges could not be filed against Zorikova and Jeong.

Unfortunately Zorikova and Jeong have rebranded and begun operating again under a new business name, "German Shepherds Dog Club of Los Angeles." Please share this video and get the word out about this fraudulent and cruel business!

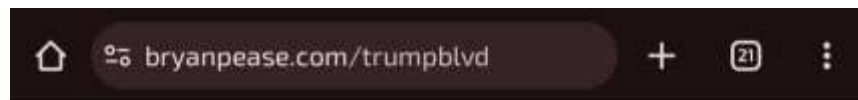
<https://vimeo.com/893140180>





EXHIBIT 27 a

(Another Unlawful Dissemination of Zorikova's Sealed Records in violation by Pease CA Penal Code 851.92, 851.91 and in Violation of CA Penal Code 161 of Court Order)



Pease

Environmental Attorney

BUYER BEWARE: German

Shepherd Dogs Los Angeles

"German Shepherd Dogs LLC," with website

www.germanshepherddogslosangeles.com, is the latest business name created by Alla Zorikova (who also goes by "Sveta," "Vanda," and "Wanda") and Oliva Jeong to sell German

Shepherd dogs and puppies they raise in miserable conditions and then sell to unsuspecting customers, sight unseen, through slick marketing.

Customers report they have received dogs who are terrified, emaciated, and filthy after making payment.

Other business names used by these two both in California and Texas have included Von Markgraf German Shepherds, Von Shutz German Shepherds, and Von Noble Hof German Shepherds.

In August 2020, in the middle of a 100-plus degree heat wave in the desert outside of Barstow, California, on a parcel of land at the end of a lengthy dirt road Zorikova had without authorization renamed "Trump Blvd," San Bernardino County Sheriff's deputies arrested Zorikova and Jeong on animal cruelty charges for having over 80 German Shepherds penned up with chicken wire on vacant land with no food, water, or structures. The nearest running water and electricity was not for miles away. When San Bernardino County Animal Control refused to do its job and save the dogs, Sheriff's deputies called on community members to come help, which they did.

1 Below is a video of the cruel and unlawful conditions in which Sheriff's deputies
2 found the German Shepherds:
3



12 A California Public Records Act (CPRA) request to San Bernardino County Code
13 Enforcement also showed notices of violation and photos of these same conditions.

14 Zorikova is currently suing me for defamation for posting this information.
15 However, the California Court of Appeal confirmed in a ruling on August 1, 2023 that this was a
16 SLAPP suit (strategic litigation against public participation), and the trial court has ordered
17 Zorikova to pay over \$40,000 in attorneys' fees and costs, which she claims she cannot afford to
18 pay.

19 The Court of Appeal specifically ruled, "Defendant's statement that plaintiff 'was
20 arrested on Animal Cruelty Charges' also is nonactionable because it is true," and noted that this
21 fact is even admitted in Zorikova's lawsuit.

22 (<https://www.courts.ca.gov/opinions/nonpub/G061152M.PDF>)

23 Zorikova's defamation case is proceeding to trial solely on my statement calling
24 her an "animal abuser squatting on land," which the Court found there is a dispute of fact
25 regarding.

26 On December 14, 2023, after three days of trial, the San Bernardino Superior
27 Court granted my motion to dismiss Zorikova's theft case against animal rescuers, finding that
28 she had not put forth any evidence to support her claims.

1 This is a photo of Zorikova taken outside the property of one of those animal
2 rescuers when she showed up after having pretended to be with a film production company
3 making a movie needing German Shepherds:
4



13 I am currently representing victims of Zorikova's fraud in multiple lawsuits. If
14 you are also a victim, feel free to contact me at the email address stated at the bottom of my
15 homepage.

16 In general, there are always many German Shepherds needing homes. If you are
17 looking to adopt, you may also email me and I will do my best to put you in touch with a rescue
18 group. I will not list those rescue groups here due to Zorikova's penchant for retaliation and filing
19 frivolous lawsuits.

20
21 **EXHIBIT 27 b**

22 (Communication of Bryan Pease with Michael Wonder, who was charged by City
23 Attorney in 2024 for sending to Alla Zorikova **DEATH THREATS**)
24
25
26
27

6:33 [signal icons] [battery icons]

LTE [signal strength] [battery 19%]



Re: Inbox



Michael Wonder 10/14/2023

Do you how hard it is to do an encrypted message to the F.B.I.??? It's really hard. No bots.



Michael Wonder 10/16/2023

to me ▾



If Alla Zorikova crossed state lines, jurisdictionally, there are some bigger players that might be able to get involved, now, and they have a lot of resources locals don't. There can be huge repercussions for violating Federal agency regulations and in Federal civil court.

Texas doesn't play when it comes to harassment and threats, no matter how they're communicated.

<https://codes.findlaw.com/tx/penal-code/penal-sect-42-07.html>

<https://codes.findlaw.com/tx/penal-code/penal-sect-42-072/>

<https://codes.findlaw.com/tx/code-of-criminal-procedure/crim-ptx-crim-pro-art-6-05.html>

Texas also doesn't play when it comes to animal welfare.

<https://txpenalcode.com/sec-42-092/>



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Bryan Pease - Activist

Dec 14 at 3:21 PM

Victory in San Bernardino trial! Animal abuser Alla Zorikova had sued animal rescuers for theft for saving and adopting out dozens of German Shepherds left on vacant land in the middle of the desert outside of Barstow, CA in a 104 degree heat wave with no food or water. Sheriffs deputies had arrested Zorikova and her daughter, Olivia Jeong, on animal cruelty charges. San Bernardino Animal Control refused to do its job and save the dogs or conduct any follow up investigation requested by DA, so criminal charges could not be filed against Zorikova and Jeong. After three days of trial, the Court granted my motion to dismiss Zorikova's theft case against the animal rescuers. Zorikova and Jeong are now operating again under a new business name, "German Shepherds Dog Club of Los Angeles." Please share this video and get the word out about this fraudulent and cruel business! <https://vimeo.com/893140180>

■ Added 4 media to this post.



Shepherds Dog Club of Los Angeles



Bryan Pease - Activist

Dec 14 at 4:04 PM

Victory in San Bernardino trial! After three days of trial, the Court granted my motion to dismiss animal abuser Alla Zorikova's theft case against animal rescuers.

Zorikova had sued animal rescuers for theft for saving and adopting out dozens of German Shepherds left on vacant land in the middle of the desert outside of Barstow, CA in a 104 degree heat wave with no food or water in August 2020. Sheriffs deputies had arrested Zorikova and her daughter, Olivia Jeong, on animal cruelty charges. San Bernardino Animal Control refused to do its job and save the dogs or conduct any follow up investigation requested by DA, so criminal charges could not be



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1
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3 **EXHIBIT 28**

4 **(CEASE AND DESIST NOTICES SENT BY ALLA ZORIKOVA TO BRYAN PESE TO**
5 **STOP PEASE'S HARASSING CRIMINAL ACTIONS TOWARDS ZORIKOVA)**

6 2020__

7
8 - Forwarded message ----- From: Boris Stein Date: Sun, Dec 24, 2023,
9 10:46 AM Subject: Notice To: Bryan Pease , Casey Gish Bryan Pease, You have been notified
10 previously, and again: I do not run any business, including "Von Noble Hof in El Paso" starting
11 from 2021 until present. I have companion dogs and they are in the best professional K9 kennels
12 available in USA in perfect conditions. I don't run any "dog business" in San Bernardino. Your
13 cyber stacking online activity against me places me and my daughter Olivia in constant fear, you
14 are threatening my and my daughter peace, life, liberty, happiness and rights to live without
15 Bryan Pease and daily attacks by Bryan Pease and hired and induced by him 3rd parties. I
16 demand again you cease and abate any and all your malicious activity online and in person
17 against me and my daughter IMMEDIATELY. Ms Zorikova

18 - Forwarded message ----- From: Boris Stein Date: Sun, Dec 24, 2023,
19 10:33 AM Subject: Cease and Abate To: Bryan Pease , Casey Gish Bryan Pease and Casey Gish,
20 You are demanded CEASE and ABATE your harmful conduct toward me, Alla Zorikova, which
21 includes and not limited to disseminating online my sealed arrest records, doxing online my
22 locations, name, pictures, GPS coordinates of my properties, vilifying me online, inviting others
23 to harass me, sending knowingly false information to authorities, posting online knowingly false
24 statements about me. Ms Alla Zorikova Penal code Notice Inbox Search for all messages with
25 label Inbox Remove label Inbox from this conversation

26 Boris Stein Sun, Dec 24, 2023, 8:20 AM (10 days ago) to Bryan, Casey, Steve
27 Bryan Pease, Penal Code 653.2 and multiple codes making cyber staking a felony prohibit your
28 willful and malicious activity against myself and my family. Actions through 3rd parties qualify
under those codes. You have to stop to propagate my sealed arrest records, post embarrassing

1 pictures, knowingly false information, death and rape threats, doxing my personal information by
2 yourself or through your agents, affiliates, employees

3 Failure to stop your cyber stacking, harassing activity against me and my family
4 will lead to additional complaints filed against you, including complaint to the special California
5 unit specialized in these online crimes. As you stated "your tactics had evolved" from physical
6 attacks with stun guns to harmful online crimes, so as laws of CA "evolved", and persons face
7 just as much jail time for illegal online activity as they would face for crimes committed
8 psychically. I have to provide you with these notifications and demand willfully stop your
9 activity against me and my family because required "demand to stop" shall be met. Ms Zorikova
10 Harassment Notice

11 Boris Stein Sun, Oct 22, 4:53 PM (23 hours ago) to Bryan Bryan Pease, Your
12 malicious and harassing posts from 2020 on your website, and social media public and private
13 forums cause to me emotional distress, inability to pursue a happiness in addition to me having
14 constant fear for my safety, life and life and safety of my family members. You have been
15 provided with notices more than dozen of times, yet, you blatantly disregarding other people
16 safety and feelings and intentionally continue your harassing activity toward me, Alla Zorikova.
17 You publicly posted day ago another knowingly false and harassing statement about me online,
18 hiring gps car tracking spies and spies around my home and work place. I am in constant fear for
19 my life and well being because of your vicious actions against me. You hired Michael Wonder to
20 murder me. Code 527 provided definition of harassment. I request you stop and notify of
21 stopping your harassing activity, including stopping sending letters with knowingly false
22 allegations against me to different government organization. If you fail to respond with
23 agreement to stop your harassment by tomorrow 8pm, I will file police report against you. Ms
24 Zorikova Restraining order Notice

25 Sun, Oct 22, 11:49 AM (1 day ago) to Bryan, Casey Notice to CEASE and
26 DESIST: Bryan Pease, Casey Gish, you hereby notified that Failure to immediately cease and
27 desist any and all harassment activity against me, my family, employees, business, place of
28 work, associates, friends will lead to restraining order against you be filed to protect us from
your daily harassment through social media, public forums and by filing to governmental

1 agencies false reports by yourself or by hiring and through third parties. Ms Zorikova Notice to
2 Stop Harassment

3 Boris Stein Thu, Oct 19, 12:41 PM (4 days ago) to Bryan, Casey Bryan Pease,
4 You hereby requested to stop (cease and desist) any and all harassment you implement daily and
5 hourly upon Alla Zorikova, her daughter Olivia Jeong, business Von Markgraf German
6 Shepherds and daily life of Ms Zorikova. Your malicious actions via public forum posts on your
7 own and other people on your behalf, " knowingly false comments" to the Zorikovas related
8 person's businesses, intervention in Zorikova's privacy and personal life, life threats to Zorikova
9 by you through other people, threat of violence against Zorikova, her family, people she knows,
10 former customers, false almost daily letters with knowingly false allegations against Zorikova to
11 different authorities are cause to Zorikova emotional distress, fear, inability to enjoy daily life,
12 lack of happiness, lose weight, inability to function. Failure to stop your harassing activity
13 against Zorikova, her family, associates and business will be grounds for preliminary injunctions
14 requested and other relief demanded, with possibility of additional lawsuits filed against offender
15 Bryan Pease. Ms Zorikova

Boris Stein	10:59 AM	
	(7 minutes ago)	
to Steve		

20 ----- Forwarded message -----
21 From: **Boris Stein** <stevejohn19732017@gmail.com>
22 Date: Sun, Dec 24, 2023, 10:46 AM
23 Subject: Notice
24 To: Bryan Pease <bryan@peaselaw.org>, Casey Gish <Casey@gishlawfirm.com>

25 Bryan Pease,
26 You have been notified previously, and again:
27 I do not run any business, including "Von Noble Hof in El Paso" starting from
28 2021 until present.

1 I have companion dogs and they are in the best professional K9 kennels available
2 in USA in perfect conditions.

3 I don't run any "dog business" in San Bernardino.

4 Your cyber stacking online activity against me places me and my daughter Olivia
5 in constant fear, you are threatening my and my daughter peace, life, liberty, happiness and
6 rights to live without Bryan Pease and daily attacks by Bryan Pease and hired and induced by
7 him 3rd parties.

8 I demand again you cease and abate any and all your malicious activity online and
9 in person against me and my daughter IMMEDIATELY.

10 Ms Zorikova

Boris Stein	11:00 AM	
to Steve	(7 minutes ago)	

11 ----- Forwarded message -----

12 From: **Boris Stein** <stevejohn19732017@gmail.com>

13 Date: Sun, Dec 24, 2023, 10:33 AM

14 Subject: Cease and Abate

15 To: Bryan Pease <bryan@peaselaw.org>, Casey Gish <Casey@gishlawfirm.com>

16 Bryan Pease and Casey Gish,

17 You are demanded CEASE and ABATE your harmful conduct toward me, Alla
18 Zorikova, which includes and not limited to disseminating online my sealed arrest records,
19 doxing online my locations, name, pictures, GPS coordinates of my properties, vilifying me
20 online, inviting others to harass me, sending knowingly false information to authorities, posting
21 online knowingly false statements about me.

22 Ms Alla Zorikova

23 Penal code Notice

24 Inbox

25 Search for all messages with label Inbox

26 Remove label Inbox from this conversation



Boris Stein	Sun, Dec	
	24, 2023, 8:20 AM (10	
to Bryan, Casey, Steve	days ago)	

1 Bryan Pease,
2 Penal Code 653.2 and multiple codes making cyber staking a felony prohibit your
3 willful and malicious activity against myself and my family. Actions through 3rd parties qualify
4 under those codes.

5 You have to stop to propagate my sealed arrest records, post embarrassing
6 pictures, knowingly false information, death and rape threats, doxing my personal information by
7 yourself or through your agents, affiliates, employees.

8 Failure to stop your cyber stacking, harassing activity against me and my family
9 will lead to additional complaints filed against you, including complaint to the special California
10 unit specialized in these online crimes.

11 As you stated "your tactics had evolved" from physical attacks with stun guns to
12 harmful online crimes, so as laws of CA "evolved", and persons face just as much jail time for
13 illegal online activity as they would face for crimes committed psychically.

14 I have to provide you with these notifications and demand willfully stop your
15 activity against me and my family because required "demand to stop" shall be met.

16 Ms Zorikova

17 Harassment Notice



Boris Stein <stevejohn19732017@gmail.com>	Sun, Oct 22, 4:53 PM (23 hours ago)	
to Bryan		

18 Bryan Pease,
19 Your malicious and harassing posts from 2020 on your website, and social media
20 public and private forums cause to me emotional distress, inability to pursue a happiness in
21 addition to me having constant fear for my safety, life and life and safety of my family members.
22 You have been provided with notices more than dozen of times, yet, you blatantly disregarding
23 other people safety and feelings and intentionally continue your harassing activity toward me,
24 Alla Zorikova.

25 You publicly posted day ago another knowingly false and harassing statement
26 about me online, hiring gps car tracking spies and spies around my home and work place. I am in
27 constant fear for my life and well being because of your vicious actions against me.

28 You hired Michael Wonder to murder me.

 Code 527 provided definition of harassment.

 I request you stop and notify of stopping your harassing activity, including
stopping sending letters with knowingly false allegations against me to different government
organization.

1 If you fail to respond with agreement to stop your harassment by tomorrow 8pm, I
2 will file police report against you.

3 Ms Zorikova
4 Restraining order Notice



6 Boris 7 Stein <stevejohn19732017@gmail.com>	Sun, Oct 22, 11:49 AM (1 day ago)	
8 to Bryan, Casey		

9 Notice to CEASE and DESIST:
10 Bryan Pease, Casey Gish, you hereby notified that
11 Failure to immediately cease and desist any and all harassment activity against
12 me, my family, employees, business, place of work, associates, friends will lead to restraining
13 order against you be filed to protect us from your daily harassment through social media, public
14 forums and by filing to governmental agencies false reports by yourself or by hiring and through
15 third parties.

13 Ms Zorikova
14 Notice to Stop Harassment



16 Boris 17 Stein <stevejohn19732017@gmail.com>	Thu, Oct 19, 12:41 PM (4 days ago)	
18 to Bryan, Casey		

19 Bryan Pease,
20 You hereby requested to stop (cease and desist) any and all harassment you
21 implement daily and hourly upon Alla Zorikova, her daughter Olivia Jeong, business Von
22 Markgraf German Shepherds and daily life of Ms Zorikova.
23 Your malicious actions via public forum posts on your own and other people on
24 your behalf, " knowingly false comments" to the Zorikovas related person's businesses,
25 intervention in Zorikova's privacy and personal life, life threats to Zorikova by you through other
26 people, threat of violence against Zorikova, her family, people she knows, former customers,
27 false almost daily letters with knowingly false allegations against Zorikova to different
28 authorities are cause to Zorikova emotional distress, fear, inability to enjoy daily life, lack of
happiness, lose weight, inability to function.

1 Failure to stop your harassing activity against Zorikova, her family, associates and
2 business will be grounds for preliminary injunctions requested and other relief demanded, with
3 possibility of additional lawsuits filed against offender Bryan Pease.

4 Ms Zorikova

5
6 **EXHIBIT 29**

7 (PETITIONER ALLA ZORIKOVA WITH HER GERMAN SHEPHERD WIGO)
8



23 **EXHIBIT 34**

24 (DEATH THREATS BY MICHAEL WONDER UPON REQUEST BY BRYAN PEASE)
25
26
27

1
2 Federal law provides some tools to combat cyberstalking. Under 18
U.S.C. 875(c), it is a federal crime.

3
4 Certain forms of cyberstalking also may be prosecuted under 47 U.S.C.
223.

5
6 NOTE: Alla Zorikova uses email on account Boris Stein
<stevejohn19732017@gmail.com>

7
8 On Thu, Jan 19, 2023, 10:18 AM Boris Stein <stevejohn19732017@gmail.com> wrote:
Tell them that my negotiation attorney will be on my behalf during the meeting. Meeting
can be at my attorney's office or at office of Pease.
Joycelyne have never agreed to seeing Pease at HER house.
Not sure who do you think you are and what illusion is in your sick head

9
10 On Thu, Jan 19, 2023, 10:46 AM Michael Wonder <michaelwonder8@gmail.com>
wrote:
Hi Alla, How are you? How's business?
Oh. It's all over and you have been exposed. You poor thing. I understand your
resentment.
I have a meeting with Bryan Pease and Tina Lawmey. Joycelyne is not involved
anymore.

11
12
13 On Thu, Jan 19, 2023, 10:46 AM Michael Wonder <michaelwonder8@gmail.com>
wrote:
Hi Alla, How are you? How's business?
Oh. It's all over and you have been exposed. You poor thing. I understand your
resentment.
I have a meeting with Bryan Pease and Tina Lawmey. Joycelyne is not involved
anymore.

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22 I am fully cooperating with every animal control officer, detective, lawyer, animal police,
activist, animal rights activist in the states California and Nevada.

23
24 I have a meeting today at Joycelyne's house with Bryan and Tina if you want to come
over and talk. Let's talk

25
26 Michael Wonder <michaelwonder8@gmail.com> wrote:
Thu, Jan 19, 10:47 AM Hi Alla, How are you? How's business?
Oh. It's all over and you have been exposed. You poor thing. I understand your
resentment.
I have a meeting with Bryan Pease and Tina Lawmey. Joycelyne is not involved
anymore.

27
28 On Thu, Jan 19, 2023, 10:50 AM Michael Wonder <michaelwonder8@gmail.com>
wrote:
P.s. I'm forwarding all this and any and all e-mails including texts to Animal Control
Officers and Bryan Pease. You might want to think how smart I am.
Good luck in prison. Good bye

Jan 19, 2023, 10:51 AM Michael Wonder <michaelwonder8@gmail.com> wrote:
Ok. Sent to police and Bryan P

1 Thu, Jan 19, 10:47 AM Hi Alla, How are you? How's business?
2 Oh. It's all over and you have been exposed. You poor thing. I understand your
3 resentment.
4 I have a meeting with Bryan Pease and Tina Lawmey. Joycelyne is not involved
5 anymore.

6 On Thu, Jan 19, 2023, 10:50 AM Michael Wonder <michaelwonder8@gmail.com>
7 wrote:
8 P.s. I'm forwarding all this and any and all e-mails including texts to Animal Control
9 Officers and Bryan Pease. You might want to think how smart I am.
10 Good luck in prison. Good bye

11 Jan 19, 2023, 10:51 AM Michael Wonder <michaelwonder8@gmail.com> wrote:
12 Ok. Sent to police and Bryan P

13 Have a nice day lol.

14 On Thu, Jan 19, 2023, 11:08 AM Michael Wonder <michaelwonder8@gmail.com>
15 wrote:
16 Everybody and Everyone are looking for you.
17 You are in so much trouble I can't even wrap my head around this. You S'veta, Wanda,
18 Olivia, Alla are the craziest sociopathic, narcissistic, evil, calculating,
19 paranoid schizophrenic woman that I've ever met. You really are. You are truly an
20 insane psycho bitch. You are so done. It's all over the place. Texas, California &
21 Nevada.
22 I got your license plate # Mercedes suv
23 I have your phone #

24 Everyone wants to find you and where you really are.

25 Your lawsuits will be all be squashed.
26 I have already contacted the police and the Animal Control Officers of Los Angeles. I've
27 also already talked to the following people.
28 Bryan Pease
Casey Gish
Justin Smith
Tina Lamey

Animal Control Officers of California
**If I ever see you again you will be met with extreme prejudice and harm.
Remember what I told you. I will chop off your motherfucking head. I will shoot
you.**

On Thu, Jan 19, 2023, 11:17 AM Boris Stein <stevejohn19732017@gmail.com> wrote:
Who is looking for me? Give me contracts and I'll report them to police immediately.
Learn to read and see Zorikova vs Pease case filed years ago and won so far. Please is
trying to appeal, it's defamation causes (Pease lied about me).
What is your goal? Get paid? Not a fuck.

On Thu, Jan 19, 2023, 11:26 AM Boris Stein <stevejohn19732017@gmail.com> wrote:
I'm aware that Pease and Lamey ask for settlement.
We can schedule appointment for Monday, any time, or let me know if other days after
Monday will work .
However, my attorney and I were always opened to negotiations. I am a Plaintiff in good
faith and all I want is to get compensated for Defendant Lamey wrong doing

On Tue, Oct 10, 2023, 4:39 PM Boris Stein <stevejohn19732017@gmail.com> wrote:
Cease and desist any and all communication.
Ms Zorikova

On Mon, Oct 9, 2023, 3:27 PM Boris Stein <stevejohn19732017@gmail.com> wrote:
You must cease and desist any and all communication, including advises. NO contact allowed nor I consent for

On Mon, Oct 9, 2023, 4:12 PM Michael Wonder <michaelwonder8@gmail.com> wrote:
I just got off the phone with the animal control office. I've scheduled an appointment to tell them everything I know. Including the post office box # you have in El Paso. It's funny to me you're pretending to be a man Boris Stein.

Anna Anatol
Reggie T
Reno G
Vanda D
Anya Hurtz. lots of Info!
Wanda
S'veta
Olivia. Good lord protect your child...

On Mon, Oct 9, 2023, 4:16 PM Michael Wonder <michaelwonder8@gmail.com> wrote:
P.s. I'm so happy to be a witness for Tina @ War Cry German Shepherds Monday.
She doesn't have you dog you crazy lady..

On Mon, Oct 9, 2023, 4:37 PM Michael Wonder <michaelwonder8@gmail.com> wrote:
Quit calling and complaining to Joycelyne about me. Fight me like a man. Please please file a restraining order against me. Based on what? You don't live with me or work here. Do it! File any court charge you want against me. You've got nothing to do with me. You should be very careful about ever dstepping foot on Joycelyne's property ever again. I will have the police and animal control there to bust your criminal, unlicensed unregistered business so help me God. Don't ever think you can, scare, intimidate or bully me you sociopathic narcissistic phycopath. Go to hell you liar, cheat and thief. Take your show on the road and never come back.

On Mon, Oct 9, 2023, 1:12 PM Michael Wonder <michaelwonder8@gmail.com> wrote:
Please refer to all communication to Bryan Pease @ 619 723 0369. Thank you

<stevejohn19732017@gmail.com>To: Pease, Mike
Bryan Pease,
You are requested cease and desist posting with malice knowingly false information on Alla Zorikova, her family and business through and by third parties, such as Michael Wonder.
You requested to cease and desist harassing my employers, my work place and customers of the business.

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Michael Wonder Yesterday

to me ▾



I wish I knew you where coming over today so I could have called the police. Just as well. Next time. I've I'm ever there I'll see you as a threat and I will chop your fingers off and feed them to Vigo. Then I'll smash whats left of your rotten teeth out of your skull and bury your body in a shallow grave in San Bernardino. You are a dog killer. Narcissist, sociopath and you disgust me. The fbi came to Joycelyne's last week. I'm going to make a formal fbi complaint online about you Olivia, Wanda, S'veta, Alla. You crazy bitch



On Mon, Jan 3, 2022, 4:06 PM Alla Anatol <stevejohn19732017@gmail.com> wrote:
How is it going?

Michael just submitted your form: Contact on [Alla Zorikova](#)

Message Details:

Name: Michael
Email: michaelwonder8@gmail.com
Subject: Illegal German Shepherd puppy mill
Message: Alla Zorikova is a sociopathic narcissist

Michael Wonder

to me

Mon, Oct 16, 11:59 AM (10 days ago)

EXHIBIT 30

(ANOTHER STOP HARASSMENT REQUEST BY ALLA ZORIKOVA ADDRESSED TO
DOCUMENTED HARASSER BRYAN PEASE)

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Court case number _____
 Other _____
 Petitioner may answer any question relating to the sealed arrest as though it did not happen, and petitioner is released from all penalties and disabilities resulting from the arrest, except as follows:

- The sealed arrest may be pleaded and proved in any later prosecution of the petitioner for any other offense, and will have the same effect as if it had not been sealed.
- The sealing of an arrest under section 851.91 does not relieve the petitioner of the obligation to disclose the arrest, if otherwise required by law, in response to any direct question contained in a questionnaire or application for public office, for employment as a peace officer, for licensure by any state or local agency, or for contracting with the California State Lottery Commission.
- The sealing of an arrest under this section does not affect petitioner's authorization to own, possess, or have in his or her custody or control any firearm, or his or her susceptibility to conviction under Chapter 2 (commencing with section 29800) of Division 9 of Title 4 of Part 6, if the arrest would otherwise affect this authorization or susceptibility.
- The sealing of an arrest under this section does not affect any prohibition from holding public office that would otherwise apply under law as a result of the arrest.

The court DENIES the petition to seal arrest.
 a. The petition does not meet the requirements listed in Penal Code section 851.91(b)(1).
 b. Petitioner's arrest does not qualify under Penal Code section 851.91(a).
 c. The court finds that sealing the arrest would not serve the interests of justice under Penal Code section 851.91(e)(7).
 d. Other: _____

Date: 9/6/2023

 Signature: _____
 Signature of: Shannon L. Fafarty

This is a Court Order.

Order to Seal Arrest and Related Records (Pen. Code, §§ 851.91, 851.92) CR-416, 1-

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EXHIBIT B

Harassment Notice



Sun, Oct 22, 4:53 PM (23 hours ago)

Boris Stein <stevejohn19732017@gmail.com>
to Bryan

Bryan Pease,
 Your malicious and harassing posts from 2020 on your website, and social media public and private forums cause to me emotional distress, inability to pursue a happiness in addition to me having constant fear for my safety, life and life and safety of my family members. You have been provided with notices more than dozen of times, yet, you blatantly disregarding other people safety and feelings and intentionally continue your harassing activity toward me, Alla Zorikova.
 You publicly posted day ago another knowingly false and harassing statement about me online, hiring gps car tracking spies and spies around my home and work place. I am in constant fear for my life and well being because of your vicious actions against me.
 You hired Michael Wonder to murder me.
 Code 527 provided definition of harassment.
 I request you stop and notify of stopping your harassing activity, including stopping sending letters with knowingly false allegations against me to different government organization.
 If you fail to respond with agreement to stop your harassment by tomorrow 8pm, I will file police report against you.
 Ms Zorikova

Restraining order Notice



Sun, Oct 22, 11:49 AM (1 day ago)

Boris Stein <stevejohn19732017@gmail.com>
to Bryan, Casey

Notice to CEASE and DESIST:
 Bryan Pease, Casey Gish, you hereby notified that
 Failure to immediately cease and desist any and all harassment activity against me, my family, employees, business, place of work, associates, friends will lead to restraining order against you be filed to protect us from your daily harassment through social media, public forums and by filing to governmental agencies false reports by yourself or by hiring and through third parties.
 Ms Zorikova

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1 *Notice to Stop Harassment*



3 Thu, Oct 19, 12:41 PM (4 days ago)

4 **Boris Stein** <stevejohn19732017@gmail.com>

5 to Bryan, Casey

6 Bryan Pease,

7 You hereby requested to stop (cease and desist) any and all harassment you implement daily and hourly upon Alla Zorikova, her daughter Olivia Jeong, business Von Markgraf German Shepherds and daily life of Ms Zorikova.

8 Your malicious actions via public forum posts on your own and other people on your behalf, " knowingly false comments" to the Zorikovas related person's businesses, intervention in Zorikova's privacy and personal life, life threats to Zorikova by you through other people, threat of violence against Zorikova, her family, people she knows, former customers, false almost daily letters with knowingly false allegations against Zorikova to different authorities are cause to Zorikova emotional distress, fear, inability to enjoy daily life, lack of happiness, lose weight, inability to function. Failure to stop your harassing activity against Zorikova, her family, associates and business will be grounds for preliminary injunctions requested and other relief demanded, with possibility of additional lawsuits filed against offender Bryan Pease.

13 Ms Zorikova

14 *Notice to Quit*



16 Tue, Oct 17, 12:03 PM (6 days ago)

17 **Boris Stein** <stevejohn19732017@gmail.com>

18 to Bryan

19 Bryan Pease, please be advised that you must purchase a puppy or other product from the business you are attempting to "review".

20 Be advised also that no one will sell you anything from the business, in addition to this, the sales contract consists terms that imply damages by default if one like you or in your behalf attempting to scam business by pretending to be "good faith" customer.

22 Furthermore,

23 Alla Zorikova is simply an independent contractor for the business for only about 2 hr per month.

24 Owner of the business is Olivia Jeong.

25 She will sue you for defamation and intrusion into business relations if one defamation lawsuit didn't teach you a lesson.

26 Furthermore, there is no single option where any comments can be left without owners approval first to avoid business attacks and harassment. However, all your bad faith attacks are collected for further litigation.

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Michael Wonder Yesterday
to me ▾



I wish I knew you where coming over today so I could have called the police. Just as well. Next time. I've I'm ever there I'll see you as a threat and I will chop your fingers off and feed them to Vigo. Then I'll smash whats left of your rotten teeth out of your skull and bury your body in a shallow grave in San Bernardino. You are a dog killer. Narcissist, sociopath and you disgust me. The fbi came to Joycelyne's last week. I'm going to make a formal fbi complaint online about you Olivia, Wanda, S'veta, Alla. You crazy bitch

On Mon, Jan 3, 2022, 4:06 PM Alla Anatol
<stevejohn19732017@gmail.com> wrote:
How is it going?



Boris Stein Jan 19
Tell them that my negotiation attorney will be



Boris Stein Jan 19

Tell them that my negotiation attorney will be on my behalf during the meeting. Meeting



Michael Wonder Jan 19

to me ▾



Hi Alla, How are you? How's business?
Oh. It's all over and you have been exposed. You poor thing. I understand your resentment.
I have a meeting with Bryan Pease and Tina Lawmeyer.
Jocelyne is not involved anymore.

[Show quoted text](#)



Michael Wonder Jan 19

to me ▾



P.s. I'm forwarding all this and any and all e-mails including texts to Animal Control Officers and Bryan Pease. You might want to think how smart I am.
Good luck in prison. Good bye

[Show quoted text](#)

EXHIBIT 31

(BRYAN PEASE'S COMMUNICATION WITH MICHAEL WONDER)

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Tue, Oct 17, 11:13 AM (6 days ago)

to me:

Author:

Bryan Pease (bryanpease@gmail.com)

Page:

<https://www.germanshepherddogslosangeles.com/>

Content:

"Alla Zorikova is her real name. This is a highly sophisticated and extensive elaborate scam. It's actually a very dangerous illegal puppy mill who only does cash in backyard rental properties. No kennels, licenses, registration or pedigree papers. Run away from this woman.



Please contact ASCP animal control or 911 Bryanpeaselaw.com

EXHIBIT E

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Michael Wonder 3:25 PM
to me ▾



If she's crossed state lines, jurisdictionally, there are some bigger players that might be able to get involved, now, and they have a lot of resources locals don't. There can be huge repercussions for violating Federal agency regulations and in Federal civil court.

Texas doesn't play when it comes to harassment and threats, no matter how they're communicated.

<https://codes.findlaw.com/tx/penal-code/penal-sect-42-07.html>

<https://codes.findlaw.com/tx/penal-code/penal-sect-42-072/>

<https://codes.findlaw.com/tx/code-of-criminal-procedure/crim-ptx-crim-pro-art-6-05.html>

Texas also doesn't play when it comes to animal welfare.

<https://txpenalcode.com/sec-42-092/>

Show quoted text

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Demand additional Zorikova vs Pease

Add label



Boris Stein 9/23/2023



to Bryan, Casey ▾

Bryan Pease,

You have been provided multiple times with and made aware during the hearing on September 03 of 2023 about order to deem arrest of Alla Zorikova as never took place and to seal all the arrest records. DOJ was notified and is enforcing the order.

However, even today, 3 weeks after that court order, It appears that you maliciously and viciously failing to **remove** your **false** posts and continue your knowingly **false** public statements about me, Alla Zorikova, being "animal abuser". You know or shall know that "abuser" by legal definition is one, who was proven guilty.

I advise you stop your aggressive activity toward me and other innocent breeders.

To breed dogs, grow crop, drink milk, eat meat, drive gasoline fed vehicles is legal and normal activity for Americans.

If you oppose and don't like these laws, just move to country that has all those in place, such as China or north Korea, get red star in a hat and red scarf around neck 🇷🇺 and enjoy the rules.

In this country there are agreement between citizens and government expressed in codes and statutes that you must obey instead of violating and attempting your violation of those (punished by fines and jail time) to justify with attacks and lies upon people.

If you want to keep posting claiming "first amendment" **post** true facts that you know exist.

This email will be attached as final notice and final request to **remove** knowingly **false** statements you posted on Alla Zorikova before I am filing my amended complaint according to court order, especially I request you **remove** lies under the link bryanpease.com/trumpblvd

Ms Zorikova



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EXHIBIT 32
(KNOWINGLY FALSE STATEMENTS BY CASEY GISH UNDER PENALTY OF
PERJURY)

1 I, Casey Gish, Esq., declare:

2 1. I am an attorney licensed to practice before all California courts and am attorney for
3 cross-complainant Tina Lamey in the above-captioned action. I state the following of my own personal
4 knowledge.

5 2. I am representing Tina Lamey pro bono in this case and other cases involving Cross-
6 Defendants Zorikova and Jeong, who send me dozens of harassing emails every week and have done so
7 for the past three years that this litigation has been pending. Their behavior escalates when there are
8 hearings or pleadings pending. Both use the same email address, stevejohn19732017@gmail.com, which
9 is the email address they list in their pleadings.

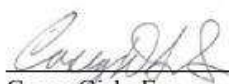
10 3. On February 28, 2022 at 6:10 a.m., while multiple pleadings and hearings were pending,
11 Zorikova sent me an email stating that her father was a Russian oligarch, and stating, "You back off,
12 Gish, it will not go good for you, no your tactics designated for sneaking in frauds going to stand here.
13 You digged dip [sic] enough hole in sand, get out there while maybe possible." A true and correct copy
14 of this email is attached to the Pease Declaration as Exhibit 4.

15 4. About an hour later, Zorikova sent me an email stating, "Where is Olivia?" This was a
16 reference to my then 5-year-old daughter. She stated nothing else in the email, a true and correct copy of
17 which is also attached to the Pease Declaration as Exhibit 4.

18 5. Other emails Zorikova and Jeong have sent to both co-counsel and myself are also
19 attached to the Pease Declaration. Zorikova and Jeong have repeatedly accused us of blackmailing
20 judges, "organ harvesting," and other bizarre allegations. If Zorikova and Jeong are not immediately
21 enjoined from contacting or referring to family members of counsel in this case, it will negatively
22 impact my ability to effectively represent my client and will thereby cause irreparable harm.

23
24 I declare under penalty of perjury under the laws of California the foregoing is true and correct.

25
26 Dated: October 8, 2023

27 By: 
Casey Gish, Esq.

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EXHIBIT 33
(TRUE RANDOM EMAILS SENT IN REALITY
FOR THE WHOLE RANDOM MONTHS)

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Reconsidering
Sorry, it will be motion for reconsideration Z... ☆

me 8/3/2023
Rehearing
Please and Gish, this is second attempt to s... ☆

me 8/3/2023
Orders
It was 2 minute orders. Please, none of your... ☆

me 8/2/2023
Meet and confer
Motion for rehearing. Contact me over the... ☆

me 7/29/2023
Another fraud
Bryan Pease, The envelope in which you dro... ☆

Screenshot_202...

me, Mail 6 7/28/2023
Notice of lawsuit
Notice of lawsuit and Demand Letter... ☆

me 7/26/2023
Thought
Smart Gish, after you seeing us making har... ☆

me 7/25/2023
Notice of lawsuit
Notice of the Lawsuit and Demand Letter C... ☆

me 7/25/2023
Head
Gish, genetics produce not only different ab... ☆

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Notice to Appear on Trial
Attached Zorikova v Lamey by: Olivia Jeong

noticeToAppear...

me 9/24/2023
first amended complaint Zorikova vs pease
(no body)

amendedCompl...

me 9/24/2023
Double agent
Impossible to believe that some of "Pease's...

me 9/23/2023
Statement
Bryan Pease, if you decide to move toward f...

me 9/23/2023
Demand additional Zorikova vs Pease
Bryan Pease, You have been provided multi...

me 9/23/2023
Supplemental exhibits Zorikova vs Lamey
Attached . So your Lamey provided 2 opposi...

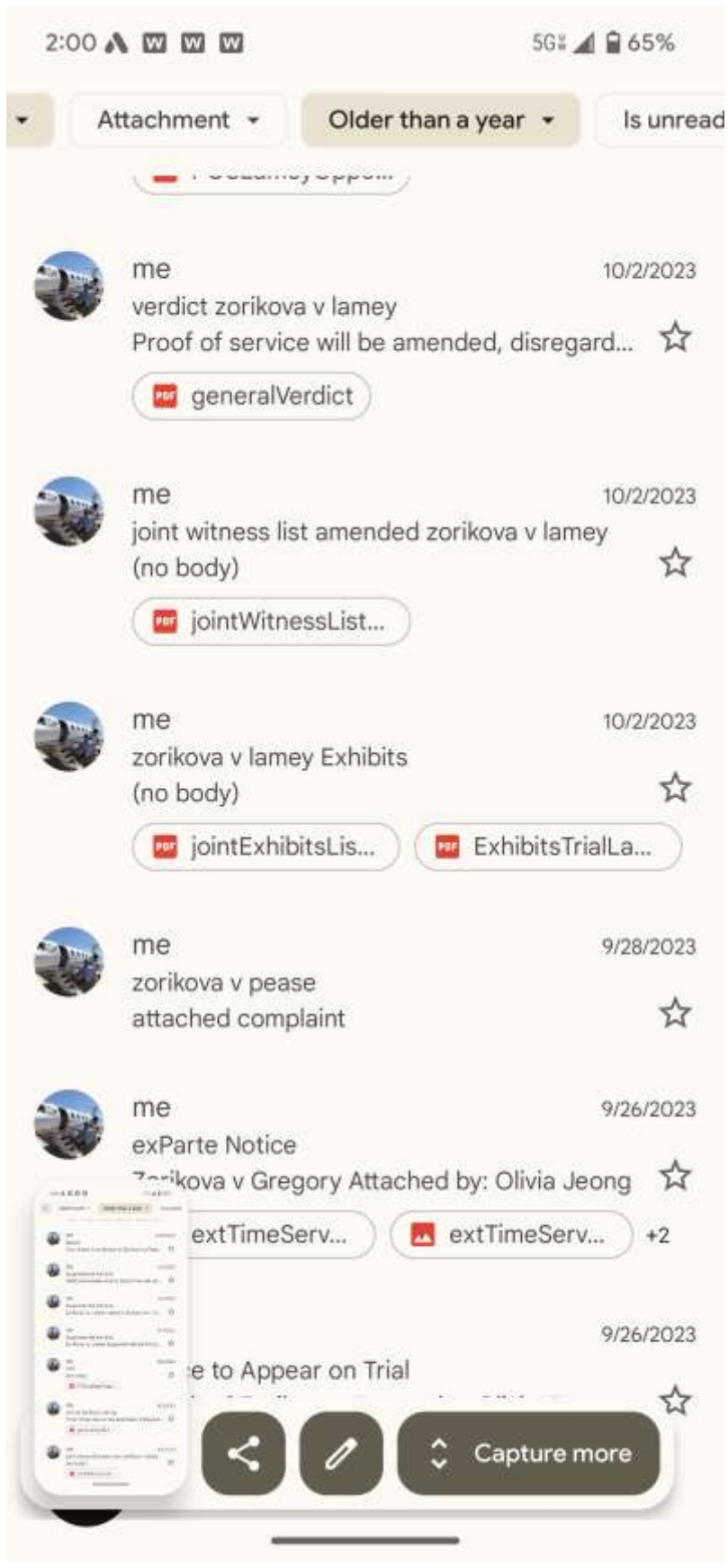
Screenshot_... Screenshot_... +2

me 9/22/2023
Data
Be advised that I am far more advanced bas...

me 9/21/2023
Supplemental exhibits
Zorikova vs Lamey Attached Ms Zorikova

Screenshot_202...

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Results in mail

me 2 11/29/2023
DA
Wondering how much cleaner at supreme c...

me 11/29/2023
Supplemental exhibit
(no body)
Screenshot_202...

me 11/27/2023
Meet and Confer and Joint exhibits witness...
Pease and Gish, You need to contact me via...

me 11/22/2023
Subpoena
Zorikova vs Lamey Olivia Jeong
Screenshot_... Screenshot_... +1

me 11/18/2023
Notice to appear
Notice to Tina Lamey to appear on trial on...


me 11/15/2023
Proposed judgement
Pease and Gish, proposed judgement and...


me 11/12/2023
Denotice


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 me 9/1/2022
Zorikova police report
Pease and Gish, In Zorikova v Lamey case I... ☆



 me 8/30/2022
Transcripts
Pease, I have transcripts 06/21/22 with your... ☆


 me 8/24/2022
Zorikova
What is papa saying? Continue or quit? Ad... ☆

 me 8/20/2022
Supplemental production
Zorikova vs Lamey Pease and Gish, Attache... ☆
 

 me 8/20/2022
Zorikova vs Lamey witness
Stated in previous email (below) new witnes... ☆

 me 8/20/2022
Zorikova vs Lamey
Pease and Gish, Following is a supplemental... ☆

 me 8/10/2022
Zorikova vs Gish
Lol, intellect shows. And you did it all by you... ☆


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Please and Gish, be advised that in Motion f... 🗑

 me 11/8/2022
Zorikova vs Lamey
Please and Gish, You had violated the Court... ☆

 me 10/26/2022
Defamation case
Pease, be advised that compensatory dama... ☆

 me 10/7/2022
Zorikova vs Lamey
Great Jon gathering all that info in Exhibit 5... ☆

 me 10/7/2022
Supplemental production
Zorikova vs Lamey Supplemental evidence,... ☆

 me 10/6/2022
Zorikova vs Lamey
Affidavit and Show Case toward contempt fi... ☆

 me 10/6/2022
Zorikova vs Lamey
Pease and Gish, Order has been issued and... ☆

 me 9/1/2022
Zorikova police report
Pease and Gish, In Zorikova v Lamey case l... ☆

 me 8/30/2022
Transcripts
Pease, I have transcripts 06/21/22 with your... ☆

← Search in mail

Attachment Older than a year Is unread

me 1/9/2023
Zorikova vs Pyle reopen
Gish, this is a good faith attempt to resolve...

me 1/8/2023
Zorikova vs Gregory
Gish, this is 3rd meet and confer attempt to...

M me ... , Mail 8, Drafts (2) 12/22/2022
A-22-855742
See attached Ms Jeong
feeWaiver2022... feeWaiver2022...

me 12/19/2022
zorikova vs pyle
Regards, Olivia Jeong
motionStayRemi...

me 12/2/2022
Zorikova vs Gregory Service
see attached
motionWithd... ProofOfServi... +1

me 11/29/2022
Zorikova vs Gregory
Gish, after careful consideration i decided t...

me 11/29/2022
Zorikova vs Gregory

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Attachment Older than a year Is unread

me 3/30/2023
Zorikova vs Lamey
Why you always saying to judge about som... ☆

me 3/30/2023
Join docs
Please be advised that if you fail to sign join... ☆

me 3/30/2023
Trial readiness
Please and Gish, I need you to cooperate, l... ☆


me 3/16/2023
Facts
Pease, I can't believe you inserted that bs a... ☆

me 3/13/2023
Motion to strike
Please and Gish, This is meet and confer att... ☆

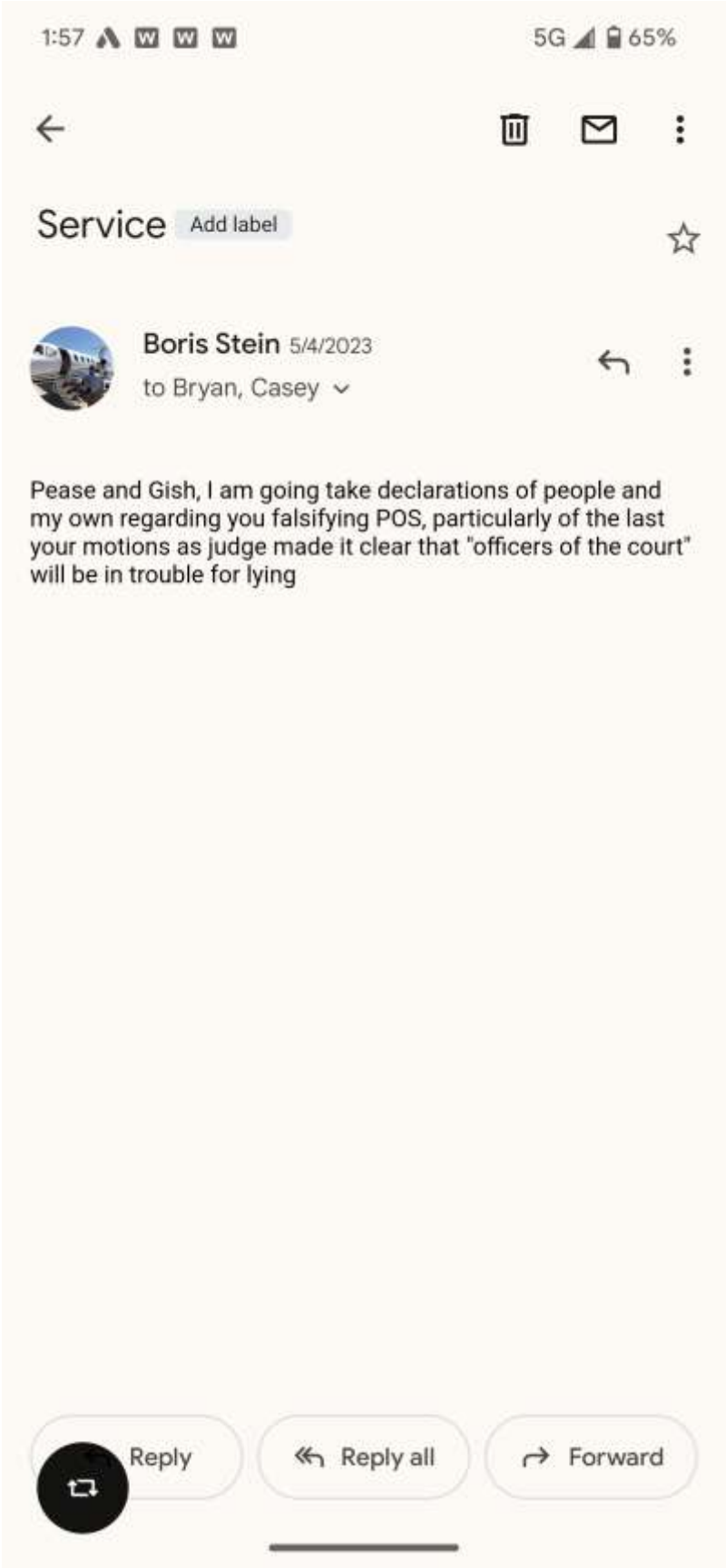
me 3/6/2023
Money laundering
Gish, do you know that brave group of inves... ☆

me 2/24/2023
Meat protein
Pease, new science published undeniable f... ☆

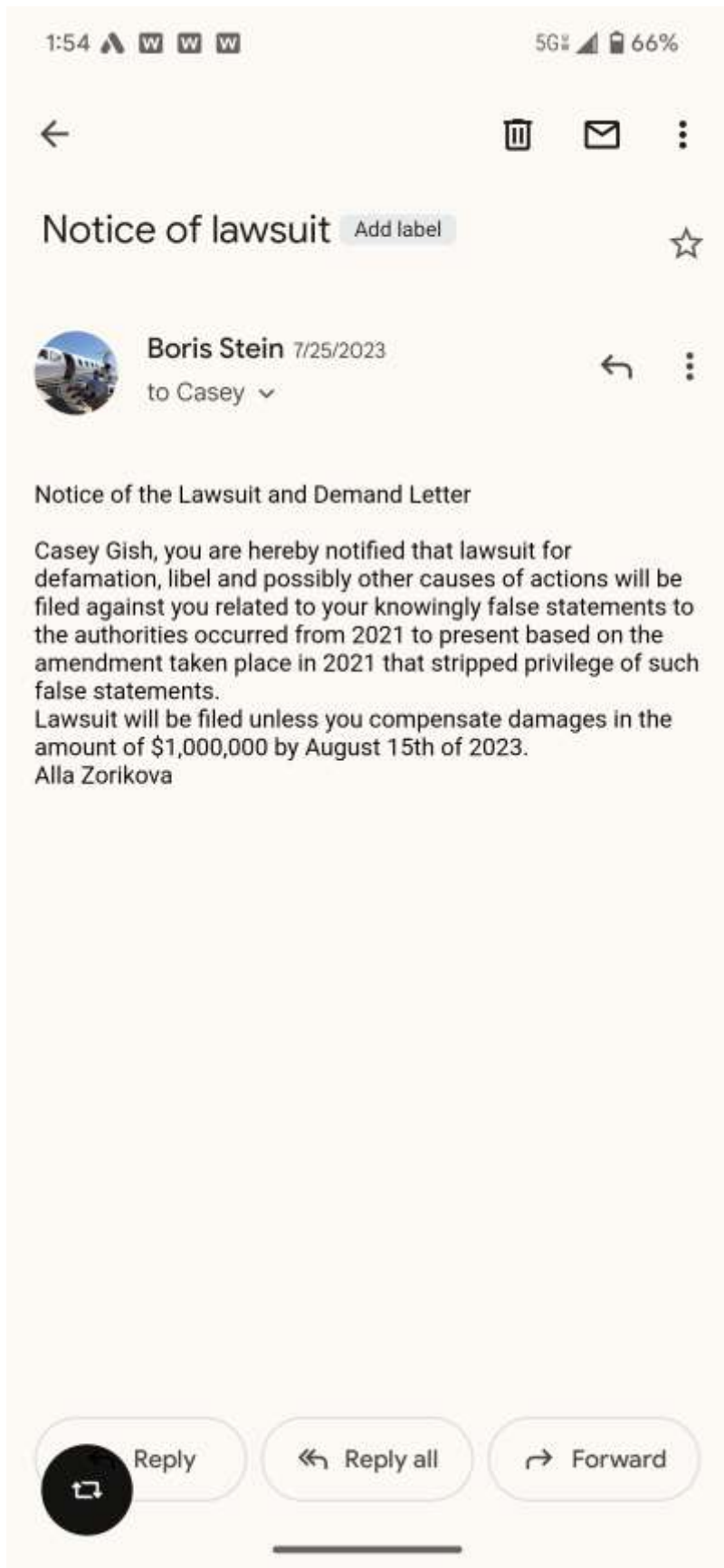
me 2/21/2023
Objection
I am going object your letter, you better wit... ☆



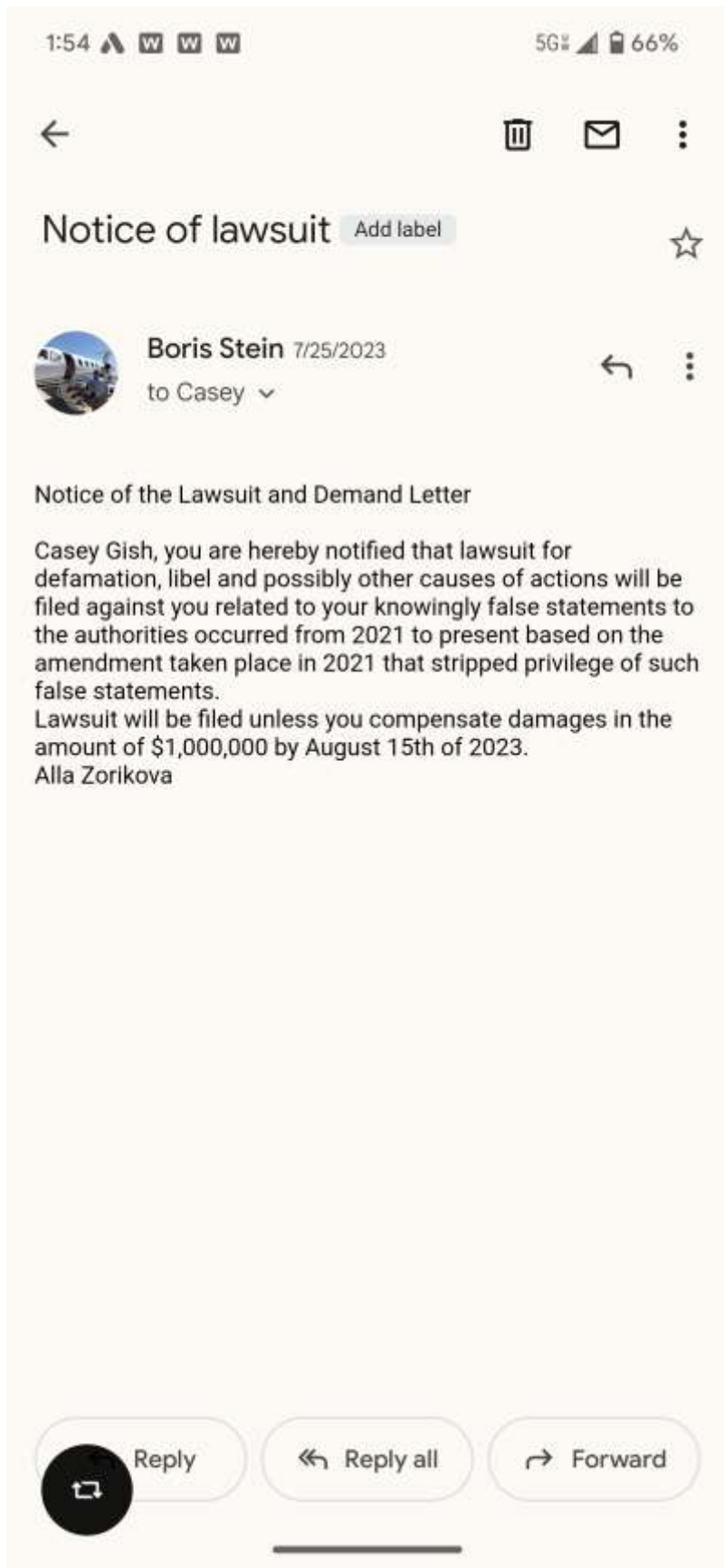
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me 9/2/2023
Moore
It was T Ward on that picture, Pease, just sa... ☆

me 8/26/2023
Screenshot (Aug 26, 2023 10:32:00 PM)
2023 new law clarifying grand theft of pet, j... ☆

me 8/25/2023
Attempted cross complaint
See attached rules under which all your cha... ☆

me 8/3/2023
Reconsidering
Sorry, it will be motion for reconsideration Z... ☆

me 8/3/2023
Rehearing
Please and Gish, this is second attempt to s... ☆

me 8/3/2023
Orders
It was 2 minute orders. Please, none of your... ☆

me 8/2/2023
Meet and confer
Motion for rehearing. Contact me over the... ☆

me 7/29/2023
Another fraud
Bryan Pease, The envelope in which you dro... ☆

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me 9/11/2023
ex parte
zorikova v pease

orderVict appExParte +4

me 2 9/11/2023
Order
Bryan Pease, see order attached requestin...

PXL_20230911_1...

me 9/9/2023
Ex parte
Please and Gish, ex parte application will be...

me 9/2/2023
Moore
It was T Ward on that picture, Pease, just sa...

me 8/26/2023
Screenshot (Aug 26, 2023 10:32:00 PM)
2023 new law clarifying grand theft of pet, j...

Screenshot_202...

me 8/25/2023
Attempted cross complaint
See attached rules under which all your cha...

Screenshot_20... Screenshot_20...

me 8/3/2023
Reconsidering
Sorry, it will be motion for reconsideration Z...

Gish's worst nightmare (yet) attached ☆



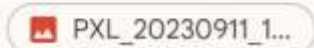
me 9/18/2023
Memory
No way Gish can remember quoter of his lie... ☆

me 9/18/2023
Screenshot (Sep 18, 2023 6:17:18 PM)
Pease, Gish and Lamey, I will file for exparte... ☆



me 9/16/2023
it's only one life
https://m.facebook.com/story.php?story_fbi... ☆

me 9/14/2023
Contempt of court
Bryan Pease, failure to remove all your publi... ☆



me 9/13/2023
Spy
All your spying activity detected and spied... ☆

me 9/13/2023
Notice of lawsuit
Bryan Pease, failure to remove any of my ar... ☆

me 9/13/2023
Sheriff
In case you are not aware investigation into... ☆

me 9/13/2023

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Attachment Older than a year Is unread

me 10/10/2023
Mason
Gish, there is no Mason in Zorikova vs Peas... ☆

me 10/6/2023
Supplemental exhibits
Additional emails sent to Detectives are on... ☆

me 10/6/2023
Supplemental exhibits
Zorikova vs Lamey Lamey's declaration fro... ☆

me 10/4/2023
Supplemental exhibits
Zorikova vs Lamey Supplemental exhibit as... ☆

me 10/2/2023
POS
(no body) ☆
PDF POSLameyOppo...

me 10/2/2023
verdict zorikova v lamey
Proof of service will be amended, disregard... ☆
PDF generalVerdict

me 10/2/2023
joint witness list amended zorikova v lamey
(no body) ☆
PDF jointWitnessList...

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me 9/2/2023
Moore
It was T Ward on that picture, Pease, just sa... ☆

me 8/26/2023
Screenshot (Aug 26, 2023 10:32:00 PM)
2023 new law clarifying grand theft of pet, j... ☆

me 8/25/2023
Attempted cross complaint
See attached rules under which all your cha... ☆

me 8/3/2023
Reconsidering
Sorry, it will be motion for reconsideration Z... ☆

me 8/3/2023
Rehearing
Please and Gish, this is second attempt to s... ☆

me 8/3/2023
Orders
It was 2 minute orders. Please, none of your... ☆

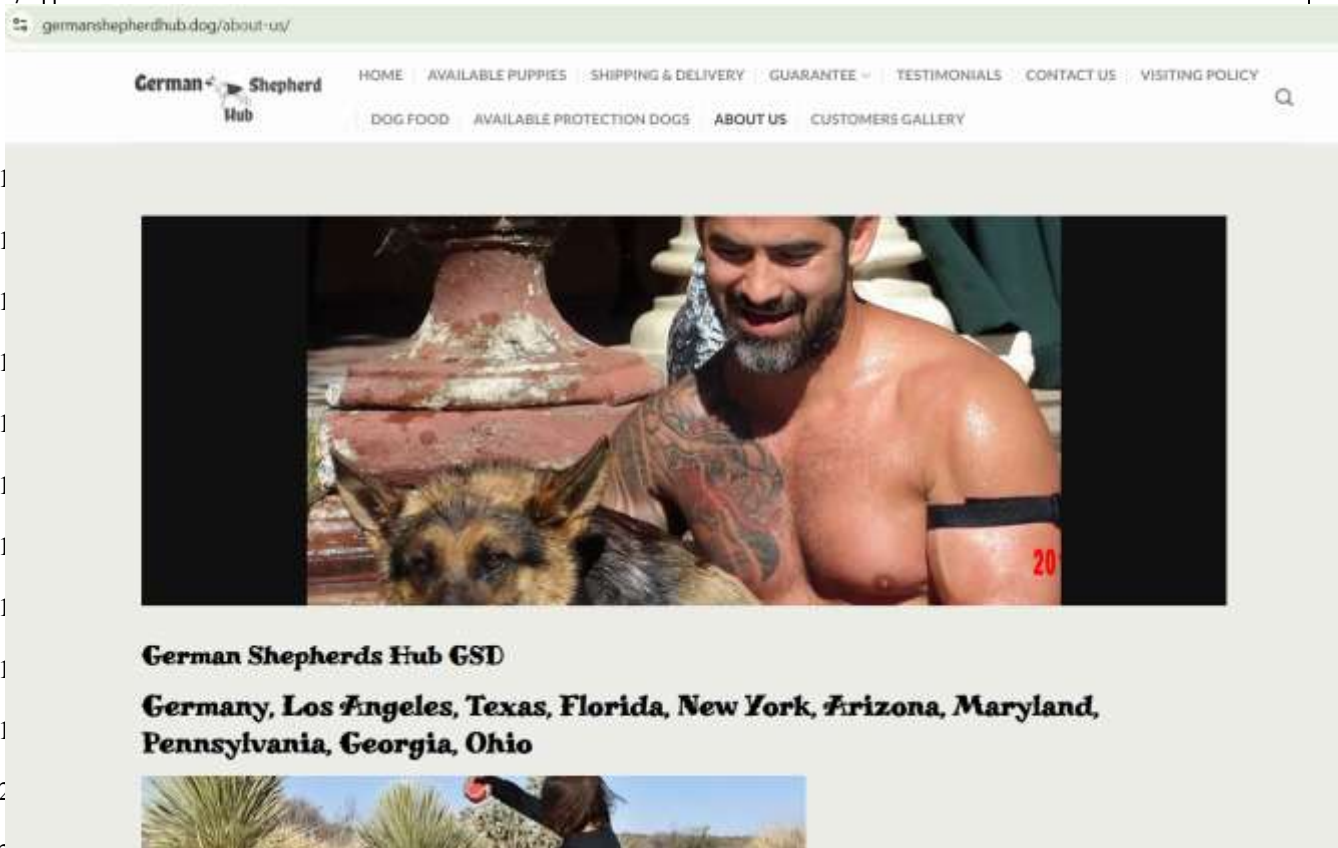
me 8/2/2023
Meet and confer
Motion for rehearing. Contact me over the... ☆

me 7/29/2023
Another fraud
Bryan Pease, The envelope in which you dro... ☆

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EXHIBIT 34

(“HUB” – THE CRIMINAL BUSINESS ALLEGEDLY CREATED BY BRYAN PEASE
WITH MALICIOUS AGENDA TO FALSELY ACCUSE AND IMPERSONATE ALLA
ZORIKOVA
IN “COMMITTING CRIME OF RUNNING ILLEGAL BUSINESS”)





German Shepherd Puppies For Sale (Westside German Shepherd Protection Puppies For Sale)



4.3 (423)

Dog breeder ·

Directions

Save

Share

+ Post



OVERVIEW

SERVICES

REVIEWS

PHOTOS

UPDAT



3016 S Hill St, Los Angeles, CA 90007



Open 24 hours

See more hours



germanshepherdhub.dog



Suggest an edit

[See all](#)

German Shepherds Hub GSD

**Germany, Los Angeles, Texas, Florida, New York, Arizona, Maryland,
Pennsylvania, Georgia, Ohio**



ACCEPT VISITS BY APPOINTMENT only.

We take our, our dog's and customer's security as a top priority based on the facts of valuable german shepherd puppies being stolen daily in California. We are 10+ years in business and the top rated and prestigious German Shepherd breeder selling top quality dogs in Los Angeles with help of training, maintenance and sales assistants.

See [CUSTOMER'S GALLERY](#) here.

See CUSTOMER'S GALLERY here.

Located on hundreds of acres of TX private pristine land and in beautiful Hollywood Hills of Los Angeles. Build in mind for natural health and comfort for our precious german shepherds.

As an Official Affiliate of the American Kennel Club and Shutzhund USA Club, the club's mission is to protect, promote and advance the interest of the German Shepherd Dog. Among the club's objectives are to encourage only breeding which will lead to breed improvement and to do all that is possible to bring the German Shepherd's physical and mental qualities to perfection.

Our customers consist of celebrities, business owners and german shepherd dogs lovers in Los Angeles, California. Some members are brand-new owners, some have been breeders and exhibitors for thirty years or more; some have many dogs, some just one and some don't have any dogs at the moment. But we all love the breed and are willing to share whatever information and experience we have to encourage others to develop the best in their dogs. Activities are held throughout the year and new members are eagerly sought.

As a German Shepherd breeders, we strive to be consistent with the quality of our German Shepherd puppies for sale which means breeding with top rated German Shepherd breeding stock of some of the best German Shepherds in the world. Breeding quality German Shepherd puppies is our passion and we are committed to offering our clients excellent German Shepherd puppies for sale with a dedication to increasing the quality of puppies with each selective breeding.

Our pure bred German Shepherd puppies for sale are registered with the American Kennel Club and/or the SV in Germany. Our German

Our pure bred German Shepherd puppies for sale are registered with the American Kennel Club and/or the SV in Germany. Our German Shepherd litters of Puppies for sale are excellent for families –good with children, adaptable to any environment. Our German Shepherd puppies have super character, rich black and red color and of course sound temperament.

Our German Shepherd puppies for sale are the product of breeding dogs with great temperament backed by elements like attentiveness, assertiveness, self confidence, courage, highly trainable, willingness to work whatever is desired on command. They are superior in health with parents being x-rayed with clear hips and elbows by the OFA or the SV.

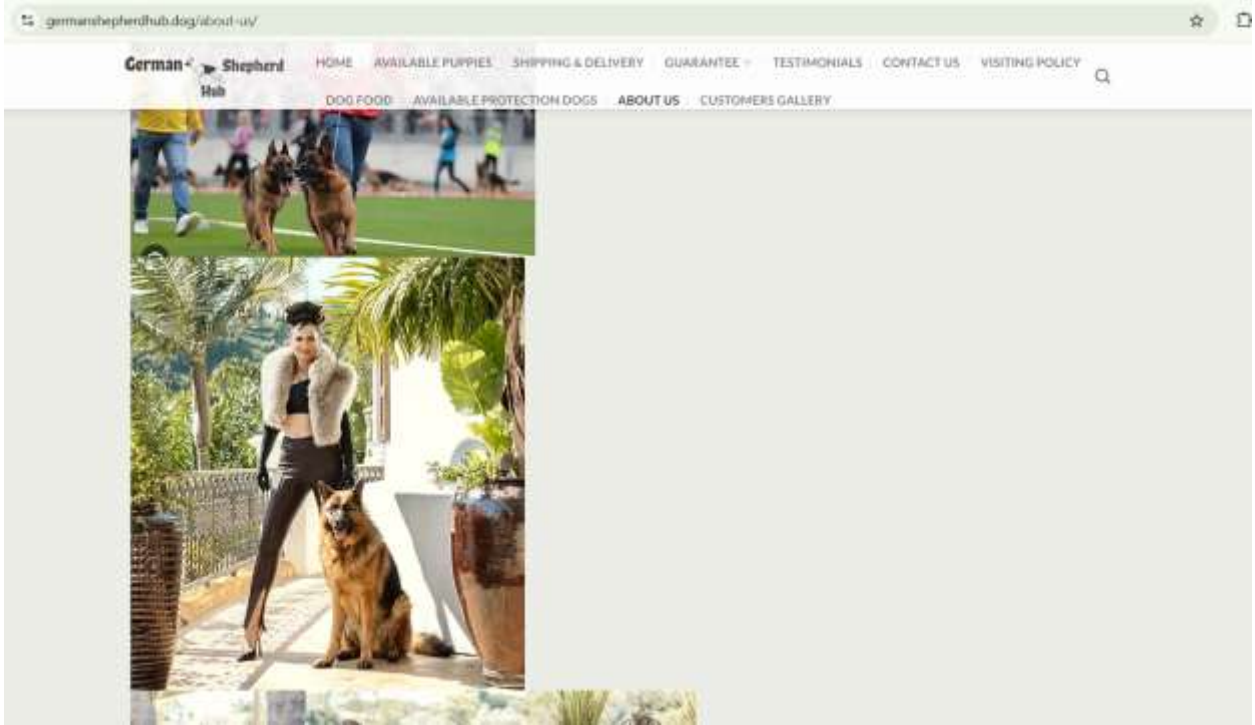
As a German Shepherd breeder, we strive to breed German Shepherds that will have rich black and red color along with excellent temperament and structure.

We sell only top quality puppies and provide the best written warranty for all sales. Our goal is your satisfaction with your puppy or dog. We have usually have several litters available.

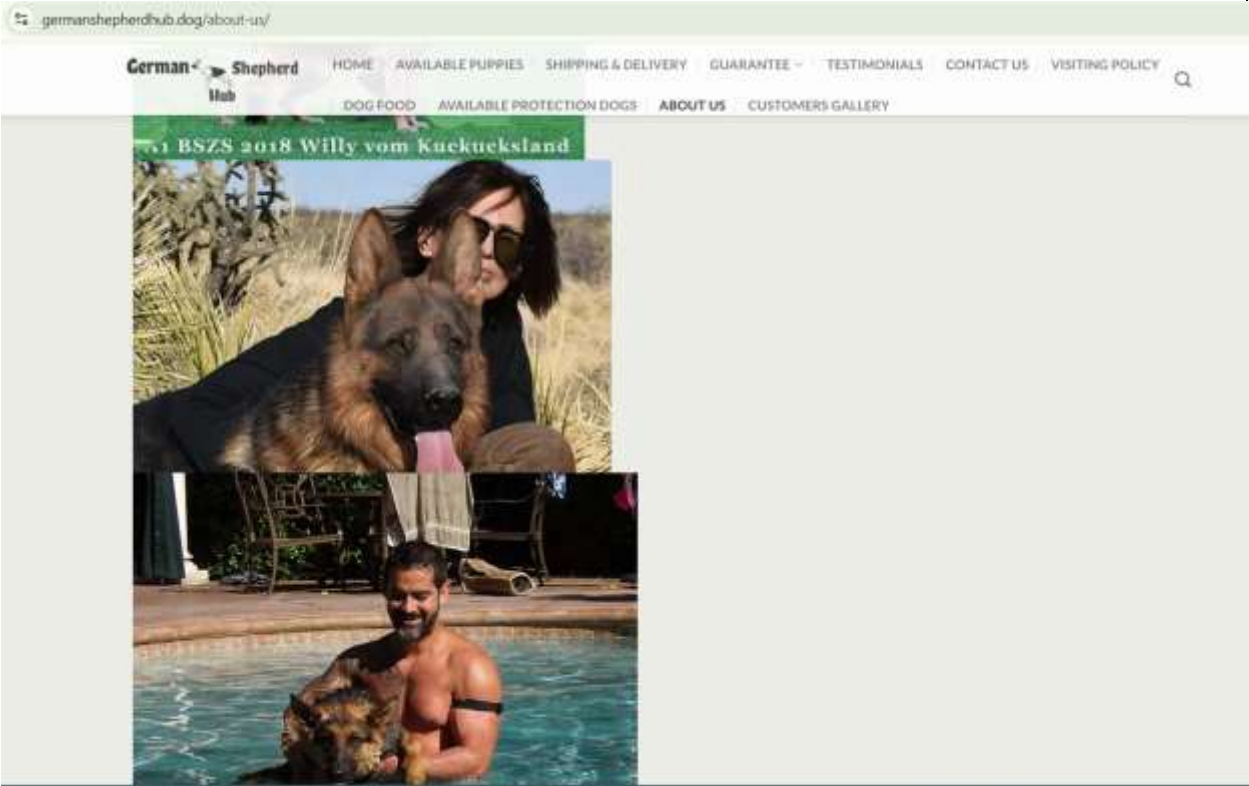
We breed show quality Show Quality, for Family Protection, Personal Security, Schutzhund, Search & Rescue, Guard Dogs, Seeing Eye Dogs, Professional Dog Training, Stud Service and Pet Quality, K-9



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germanshepherdhub.dog/guarantee/

German Shepherd Hub

HOME AVAILABLE PUPPIES SHIPPING & DELIVERY GUARANTEE TESTIMONIALS CONTACT US VISITING POLICY

DOG FOOD AVAILABLE PROTECTION DOGS ABOUT US CUSTOMERS GALLERY



LIFETIME GUARANTEE

The word lifetime refers to the period of 10 years from your puppy's birthday.

*Although, knowing that your puppy can never be replaced, we believe that having another four legged furry companion may help lessen the sadness in your home. In the very unlikely death (never happened before) of your puppy within one year from its birthday due to genetics, or if the German Shepherd puppy is found to have a life threatening congenital or hereditary disorders (within one year), we will replace the puppy with another German Shepherd puppy of equal value at no addition cost to you. Of course you are able to keep your other puppy. It would be cruel to remove a family member. We reserve the right to have the diagnoses verified by another veterinarian of our choice, before placing another puppy into your home.

*In the event of the death of your puppy, due to life threatening congenital defects, after the first year of birth, we will issue a credit in the amount of 50% of the original cost towards the purchase of a replacement German Shepherd puppy of equal value. In either case, the buyer's licensed veterinarian must provide the seller with a written certificate stating the exact cause of death as verified by a necropsy/autopsy. If the death was caused by a genetic defect listed above and not neglect by the buyer, the German Shepherd puppy will be replaced with one of equal value as soon as one is available. In the case of death you will also have to provide the microchip that was given by the breeder. (This is to proof that it is the canine you bought from German Shepherds Hub LLC). If these regulations as well as the ones below are not met the guarantee becomes null and void.

germanshepherdhub.dog/guarantee/

German Shepherd Hub

HOME AVAILABLE PUPPIES SHIPPING & DELIVERY GUARANTEE TESTIMONIALS CONTACT US VISITING POLICY

DOG FOOD AVAILABLE PROTECTION DOGS ABOUT US CUSTOMERS GALLERY

If you ever have to use this guarantee, you will need to provide all papers with this seal and seal given to you by the breeder, registration papers, German Shepherds Hub LLC, registration papers (if applicable), all the vet records showing the continued health and maintenance of your canine from vet checks/visits every 6 months and produce their microchip.

If these regulations are not met the guarantee will become null and void.

This extended health guarantee is valid, for all German Shepherd puppies purchased from us

We reserve the right to refund any deposit placed on a puppy at any time, for any reason.

Thank you

You will be glad you chose a German Shepherd puppy from us!

Copyright 2024 © Home Puppies

Below are pictures of customers with their previously purchased puppies.
To see Puppies AVAILABLE click [HERE](#)

Customers Gallery

Our Happy Customers with their Puppies!



german shepherd dogs

Shepherd Breeder | Beverly Hills, CA
5.0 ★★★★★ (7)
Dog breeder - 113 N San Vicente Blvd suite 348
Open - Closes 10PM - (424) 600-9434
"Royal Tribes K9 made finding a German Shepherd puppy a wonderful experience."

German Shepherd Puppies For Sale (Westside German Shepherd Protection Puppies For Sale)
4.3 ★★★★★ (423)
Dog breeder - 3016 S Hill St
Open 24 hours
Onsite services

Von Wa-Bo German Shepherds
5.0 ★★★★★ (3)
Dog breeder
Open - Closes 6PM - (949) 463-8821

Kempkes Executive K9 Wüstenberger-Land

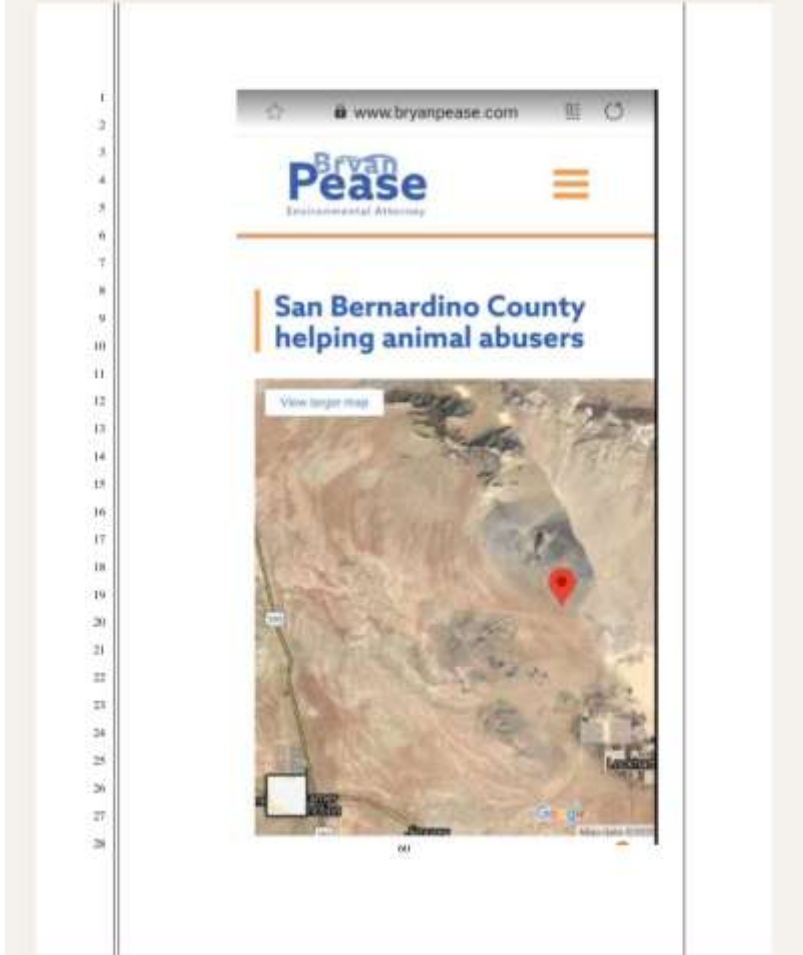
German Shepherd Puppies For Sale (Westside German Shepherd Protection Puppies For Sale)
4.3 ★★★★★ (423)
Dog breeder - 3016 S Hill St, Los Angeles, CA 90007
Open 24 hours
See more hours

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EXHIBIT 35

(Bryan Pease Vilifying and then DOXXING Alla Zorikova's Location to Impose
her to Harm by 3rd Parties)

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EXHIBIT 36

(Two of several “private investigators” reports from 2020 to 2024 after surveillance by Bryan Pease of Zorikova’s vehicles, private properties, stalking, harassing, threatening with violence, trespassing property of Alla Zorikova)

1
2 RAY FARMER INVESTIGATIONS

3 POST OFFICE BOX 385, RIALTO, CA 92377
4 (909) 387-1048 – FAX (909) 820-3386
5 Email: ray@farmerpi.com

CIVIL-CRIMINAL - WORKER COMPENSATION ISSUES
INSURANCE CLAIMS - AOE/COE - SUBROGATION-SUB ROSA
Confidential – PI 22226

6 Law Offices of Bryan W. Pease
7 302 Washington Street - #404
8 San Diego, CA 92103
9 Attn: Bryan W. Pease, Esquire

November 5, 2020
Re: Zorikova vs Lamey, et al
Case No. CIVDS 2017383
RFI: 204CV010

10 Dear Mr. Pease:

11 In accordance with your request, investigative services have been provided regarding the above
12 matter. At the time of assignment, client requests investigation to document publicly displayed
13 conduct and activities at a dog breeding business located at 46402 Hoffman Road, Hinkley, CA.
14 Therefore, our firm, in accordance with Civil Code section 1708.8, conducted investigation, as
15 directed.

16 **Assignment:**

17 Assigned to drive to 46402 Hoffman Road, Hinkley, CA, and document publicly displayed conduct
18 and activities at a dog breeding business.

19 **Overview:**

20 Investigator was provided copies of a court order issued by San Bernardino County Superior Court
21 Judge Bryan Foster, dated 10/14-2020.

22 **Field Investigation:**

23 On 11/02-2020, investigator drove a four-wheel drive vehicle to the area of 46402 Hoffman Road, Hinkley,
24 CA, to document by surveillance a property identified to him as a dog breeding business located on
25 undeveloped desert property.
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Private Investigator and Expert Fact Witness

Gregory Tucker, M.L.S., M.S.C.J., M.S.F.B.S. PI License # PI188351

Date Assigned: September 9, 2024

Case Type: Property Observation and Photography

Location: 46402 Hoffman Rd., Red Mountain, CA

Coordinates: 35.10N, 117.38W

Completion Date: September 8, 2024

Introduction

This report documents the findings from an investigation conducted at the property located at 46402 Hoffman Rd. in Red Mountain, California. The purpose of this investigation was to observe and photograph the current state of the property, focusing on any signs of activity or abandonment.

Field Investigation Observations

Upon arrival, the investigation team conducted a systematic examination of the property. The following key observations were made:

1. Signs of Abandonment

The property exhibited clear indicators of abandonment. Areas that may have been previously active were now overgrown and neglected, suggesting no recent maintenance or use.

EXHIBIT 37

(Copy of Criminal Investigation Record opened by LAPD against Bryan Pease)

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Department REPORT		UCR CODE CC: _____		<input type="checkbox"/> COMBINED EVID. REPORT		<input type="checkbox"/> MULTIPLE DRS ON THIS REPORT	
INVEST DIV. 06		INC # 210120002391		DR #			
BUSINESS) TOLYEVNA		SEX F	DESC LWA	HT 508	WT 130	AGE 56	DOB 02-25-67
LA		ZIP 90068		PHONE 323 854 9167		X <input checked="" type="checkbox"/>	
						<input type="checkbox"/>	
				CELL PHONE			
FOREIGN LANGUAGE SPOKEN _____				OCCUPATION CONSULTANT			
E AS V'S		<input checked="" type="checkbox"/> RES.	<input type="checkbox"/> BUS.	R.D. 0629		PRINTS BY PREL. INV. ATTEMPT OBTAINED <input type="checkbox"/> Y <input type="checkbox"/> N	
				DATE & TIME REPORTED TO PD 01-20-24 1548			
GIVEN <input type="checkbox"/> 03.04.00		STOLEN/LOST \$ 4		RECOVERED \$ 0		EST. DAMAGED ARSON/VAND. \$ 0	
CONNECTED REPORT(S) (TYPE & DR #) _____							
RES. INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY ALL ITEMS MISSING IN THIS INCIDENT IN THE							

Page 1 of 1 03 01 00 (09/02/22)

Los Angeles Police Department
INVESTIGATIVE REPORT

UCR CODE: COMBINED EXID. REPORT
CC: MULTIPLE CRIS ON THIS REPORT

REPORT OF: Ortega, Bryan SUBJECT DIV: 28 INC # 26120002391 OR #

CASE SCREENING FACTOR(S)
 SUSPECT/VEHICLE NOT SEEN
 PRINTS OR OTHER EVIDENCE NOT PRESENT
 NO NOT DISTINCT
 PROPERTY LOSS LESS THAN \$1,000
 NO SERIOUS INJURY TO VICTIM
 ONLY ONE VICTIM INVOLVED

VICTIM
 LAST NAME, FIRST, MIDDLE (OR NAME OF BUSINESS): ZORIKOVA, ALLA A. SEX: F DESC: Lat HT: 503 WT: 130 AGE: 36 DOB: 02-25-87
 ADDRESS: R. 3644 Poplar Ave. #1 CITY: LA ZIP: 90008 PHONE: 310 559 9167
 E-MAIL ADDRESS: _____ CELL PHONE: _____
 DR. LIC. NO. (IF NONE, OTHER ID & NO.): _____ FOREIGN LANGUAGE SPOKEN: _____ OCCUPATION: Consultant

PREMISES (SPECIFIC TYPE) ATM

ENTRY #888#V POINT OF ENTRY: _____ POINT OF EXIT: _____ LOCATION OF OCCURRENCE: _____ SAME AS VS RES. BUS. R.D. 0629 PRINTS BY FREL. #VV: _____
 FRONT METHOD: _____ DATE & TIME OF OCCURRENCE: 09-7-23 12:00 PM DATE & TIME REPORTED TO PD: 01-20-24 1543
 REAR INSTRUMENT/TOOL USED: _____ TYPE PROPERTY STOLEN/LOST/DAMAGED: _____ \$1.04.00 GIVEN: _____ STOLEN/LOST: _____ RECOVERED: _____ EST. DAMAGED: _____
 SIDE
 ROOF
 FLOOR
 OTHER

VICT'S VEH. (IF INVOLVED) YEAR, MAKE, TYPE, COLOR, LIC. NO. NOTIFICATIONS (PERSON & DIVISION) CONNECTED REPORT(S) (TYPE & OR #)

MO IF LONG FORM, LIST UNIQUE ACTIONS. IF SHORT FORM, DESCRIBE SUSPECT'S ACTIONS IN BRIEF PHRASES, INCLUDING WEAPON USED. DO NOT REPEAT ABOVE INFO BUT CLARIFY REPORT AS NECESSARY. IF ANY OF THE MISSING ITEMS ARE POTENTIALLY IDENTIFIABLE, ITEMIZE AND DESCRIBE ALL ITEMS MISSING IN THIS INCIDENT IN THE NARRATIVE.

THREAT OF SCHOOL VIOLENCE TRANSIT-RELATED INCIDENT MANDATORY MARY'S RIGHTS CARD PROVIDED TO THE VICTIM MOTIVATED BY HATRED/PREJUDICE DOMESTIC VIOLENCE

REPORTING EMPLOYEE(S) INITIALS, LAST NAME: ORTEGA SERIAL NO.: 43002 DIV./DETAIL: HWS PERSON REPORTING: ORTEGA SIGNATURE: _____ OR RECEIVED BY PHONE:
 NOTE: IF SHORT FORM AND VICTIM'S NAME NOT THE SAME, ENTER PR INFORMATION IN INVOLVED PERSONS SECTION

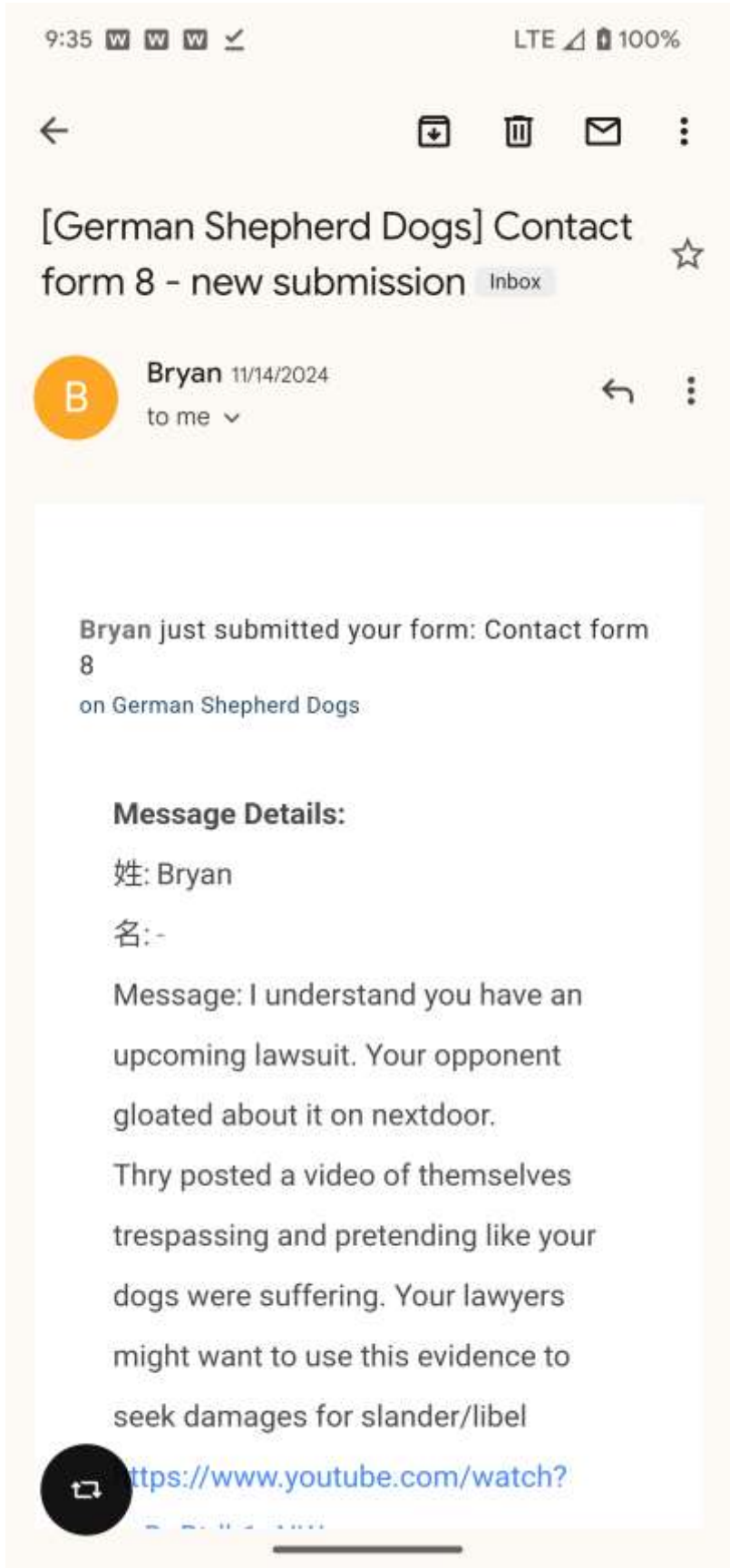
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EXHIBIT 38

The true and correct copy of emails Bryan sent to Alla on Nov 14 of 2024 (on the exact date and after Bryan just “obtained” his fraudulent “restraining order” in San Diego against Alla Zorikova without Zorikova’s knowledge.)

The true and correct copy of of emails Bryan sent to Alla on Nov 15 of 2024 (on the exact date and before the TRIAL CALL In defamation case Zorikova v Pease in San Diego.)

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9:38 W W W ✎

100%



youtube of themselves
poking around and sobbing
about your dogs
"suffering."
I understand if youre
stressed by the situation,
but learn to identify your
enemies. Youtube links are
not malicious. Just
forward the links to your
lawyers.
Good luck with it.
-b

Reply Now

You can also hit reply to this email.

Never miss a lead.

Download the Wix Mobile App.

[Edit your email settings](#)



9:39

LTE 100%



Boris Stein
<stevejohn19732017@gmail.com>

[German Shepherd Dogs] Contact form 8 - new submission

Bryan <c883af0e-5eb3-4e44-ac98-43a604a0970f@crm.wix.com>
Reply-To: Bryan <c883af0e-5eb3-4e44-ac98-43a604a0970f@crm.wix.com>
To: stevejohn19732017@gmail.com

Thu, Nov 14, 2024
at 7:14 PM

Bryan just sent you an email on [Los Angeles German Shepherds](#)

Yeah it looks to me like
youre gunna come out on
top. Seems unwise to post
a video of themself
trespassing. And for what?
To show some dogs chillin
happily in the shade of
their kennels? Deranged.
-b



Reply Now

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Bryan ... , me, Bryan 52

11/15/2024

[German...] Contact form 8 - new submission

Cease and DESIST any and all retard...

Inbox



Screenshot_202...

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[German Shepherd Dogs] Contact form 8 - new submission

Inbox



Bryan 11/14/2024

Bryan just submitted your form: Contact form 8on German Shepherd DogsMessage Details:姓:

50



Bryan 11/15/2024

to me ▾



Hide quoted text

Bryan just sent you an email on Los Angeles German Shepherds

you? The way you communicate is wildly deranged and hostile. I sent you a tip to help you defend a lawsuit, and you responded with insults in broken English. Of course Im not wasting time asking about every nonsense word you say. All Im interested in doing it helping you realize what a shitty person you are. You could apologize you know.

3. You're a sodomist who
enjoys putting things in
your anus. My description
of your disgusting
behavior isn't any sort of
threat.
Any questions?

Hide quoted text



Reply Now

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2 Bryan just sent you an email on Los
3 Angeles German Shepherds

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6 I will understand every
7 response from you is an
8 implied consent to receive
9 another message from
10 me.

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12 That said, you are really,
13 exceptionally stupid.

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15 Did you spit in your
16 mothers face as a child
17 when she fed you?

18
19 May no allies come to you
20 ever again. May your life
21 be one shitty struggle
22 after another, for you
23 insult your friends and
24 therefore deserve none.

25
26 Youre a shit person and I
27 hope you get dog herpes.
28



Reply



From stevejohn19732017@gmail.com

To



Bryan

76927575-0918-49c1-9d34...



Copy

Re:
new



Remove

orm 8 -

Compose email



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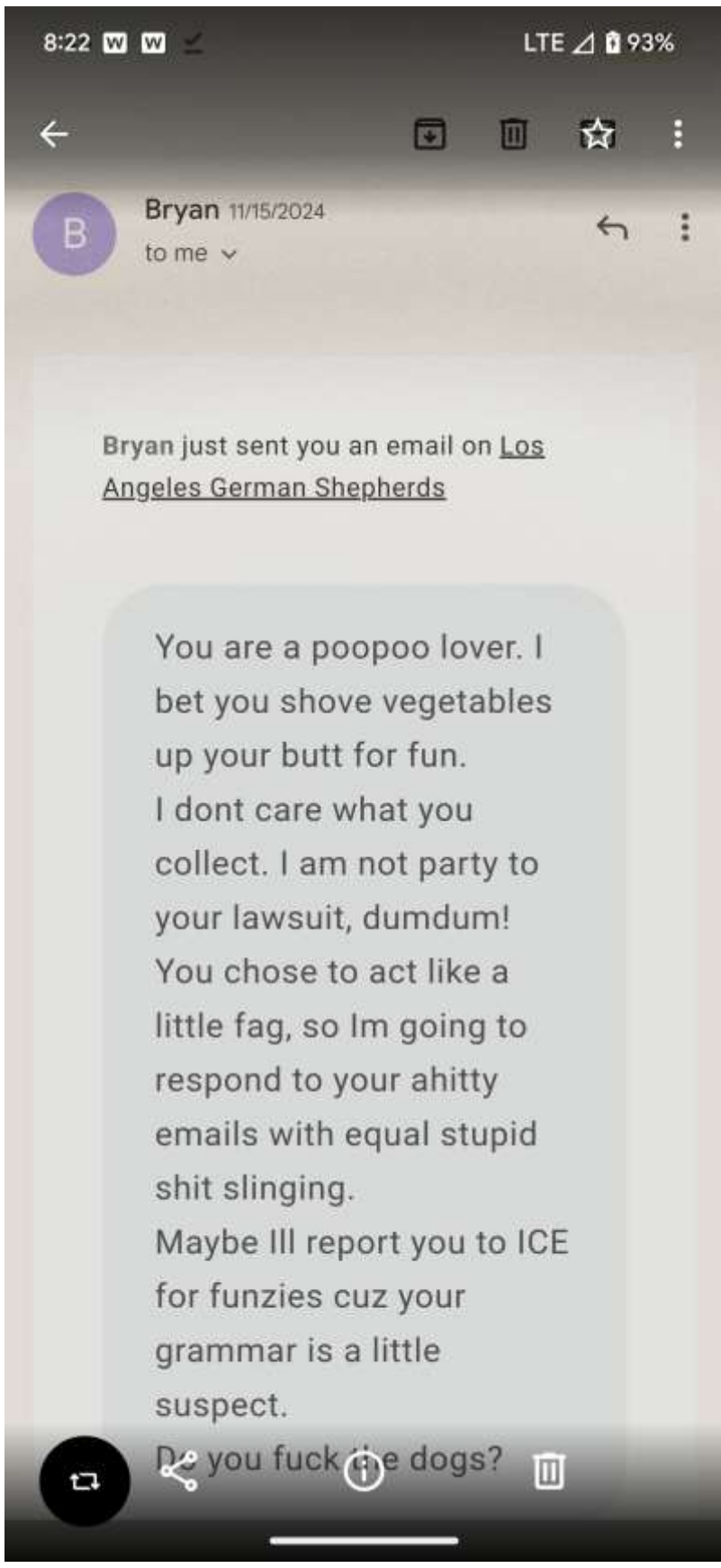
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Bryan just sent you an email on [Los Angeles German Shepherds](#)

You are a poopoo lover. I bet you shove vegetables up your butt for fun. I dont care what you collect. I am not party to your lawsuit, dum dum! You chose to act like a little fag, so Im going to respond to your ahitty emails with equal stupid shit slinging. Maybe Ill report you to ICE for funzies cuz your grammar is a little suspect.

Do you fuck the dogs?



Bryan 11/15/2024

to me ▾



Bryan just sent you an email on Los Angeles German Shepherds

You are a poopoo lover. I
bet you shove vegetables
up your butt for fun.

I dont care what you
collect. I am not party to
your lawsuit, dum dum!

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Boris Stein 11/15/2024



to Bryan ▾

Noone reads your shit, just collecting

On Fri, Nov 15, 2024, 7:57 AM Bryan <ad78ec7b-ed50-409d-9710-0c1ba0f5ccc3@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds

Imagine a thick,
unwashed cock sliding
in and out of your anus.

[Show quoted text](#)



Bryan 11/15/2024



to me ▾



Boris Stein
<stevejohn19732017@gmail.com>

[German Shepherd Dogs] Contact form 8 - new submission

Bryan <ad78ec7b-ed50-409d-9710-0c1ba0f5ccc3@crm.wix.com>

Fri, Nov 15, 2024
at 8:57 AM

Reply-To: Bryan <ad78ec7b-ed50-409d-9710-0c1ba0f5ccc3@crm.wix.com>
To: stevejohn19732017@gmail.com

Bryan just sent you an email on Los Angeles German Shepherds

Imagine a thick, unwashed
cock sliding in and out of
your anus.

Reply Now

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2 On Thu, Nov 14, 2024, 5:53 PM Bryan <693d9dfa-58b2-492a-
bfd5-c87d60d22160@crm.wix.com> wrote:

3
4 Bryan just sent you an email on Los
5 Angeles German Shepherds

6
7
8 Jeez dude, just trying to
9 help.

10
11 Some whacko on
12 nextdoor is calling for
13 your heads. They posted
14 a video on youtube of
15 themselves poking
16 around and sobbing
17 about your dogs
18 "suffering."

19
20 I understand if youre
21 stressed by the
22 situation, but learn to
23 identify your enemies.
24 Youtube links are not
25 malicious. Just forward
26 the links to your lawyers.

27
28 Good luck with it.

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On Thu, Nov 14, 2024, 6:14 PM Bryan <c883af0e-5eb3-4e44-ac98-43a604a0970f@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds

Yeah it looks to me like you're gonna come out on top. Seems unwise to post a video of yourself trespassing. And for what? To show some dogs chillin happily in the shade of their kennels? Deranged.
-b

[Show quoted text](#)


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Boris Stein 11/14/2024



to Bryan ▾

 Bryan btw went totally mentally dispensed, he doesn't remember name of courts nor that name "Bryan" is his own name while impersonating

[Show quoted text](#)

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8:40 W W

LTE 99%



Boris Stein
<stevejohn19732017@gmail.com>

[German Shepherd Dogs] Contact form 8 - new submission

Bryan <a778a122-bee4-4725-b19b-0d8d6f8cadeb@crm.wix.com>
Reply-To: Bryan <a778a122-bee4-4725-b19b-0d8d6f8cadeb@crm.wix.com>
To: stevejohn19732017@gmail.com

Fri, Nov 15, 2024
at 10:00 AM

Bryan just sent you an email on [Los Angeles German Shepherds](#)

Oh? I thought no one was reading my emails.
My description of your consensual homosexual imagination might interest an "investigator," depending on his sexual preferences.

It does tickle me the thought of some poor lawyers or judge having to read these emails, all the while groaning and



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Boris Stein 11/15/2024



to Bryan ▾

Collecting to add to your criminal case for harassment, your fucking IP will be searched warrant

On Fri, Nov 15, 2024, 7:57 AM Bryan <ad78ec7b-ed50-409d-9710-0c1ba0f5ccc3@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds



Imagine a thick,

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Boris Stein 11/15/2024



to Bryan ▾

CEASE and DESIST any and all communication.
Normally 8 to 10 of CEASE and DESIST notifications are
enough for filing a separate police report

On Fri, Nov 15, 2024, 7:35 PM Bryan <755ce273-3755-476d-8087-5bbeec8f1947@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds



Cease and DESIST any
and all retardation!

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3 Bryan just sent you an email on Los
4 Angeles German Shepherds
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8 You are a poopoo lover. I
9 bet you shove vegetables
10 up your butt for fun.
11 I dont care what you
12 collect. I am not party to
13 your lawsuit, dum dum!
14 You chose to act like a
15 little fag, so Im going to
16 respond to your ahitty
17 emails with equal stupid
18 shit slinging.
19 Maybe Ill report you to ICE
20 for funzies cuz your
21 grammar is a little
22 suspect.
23 Do you fuck the dogs?
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 **Bryan** 11/15/2024
to me ▾

Bryan just sent you an email on Los Angeles German Shepherds

You are a poopoo lover. I bet you shove vegetables up your butt for fun. I dont care what you collect. I am not party to your lawsuit, dum dum! You chose to act like a little fag, so Im going to respond to your ahitty emails with equal stupid shit slinging. Maybe Ill report you to ICE for funzies cuz your grammar is a little suspect.

Do you fuck the dogs?



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EXHIBIT 39

(Numerous repeated “CEASE and DESIST requests” sent by Alla Zorikova to Bryan in response for rape threats, offenses, harassment, cyberstalking)





Boris Stein 11/15/2024



to Bryan ▾

Lol, I am very intelligent , idiot, it was just a description of what you did with Gish.

You are not asking who the Gish is.

Screenshot of your rape threat was just emailed to detectives on your case

On Fri, Nov 15, 2024, 8:40 AM Bryan <2a49b106-af75-4983-9364-634fb74207b9@crm.wix.com> wrote:



Boris Stein 11/15/2024

to Bryan ▾



CEASE and DESIST any and all communication

On Fri, Nov 15, 2024, 7:35 PM Bryan <755ce273-3755-476d-8087-5bbeec8f1947@crm.wix.com> wrote:


[Show quoted text](#)



Boris Stein 11/14/2024

to Bryan ▾



 Bryan btw went totally mentally dispensed, he doesn't remember name of courts nor that name "Bryan" is his own name while impersonating

[Show quoted text](#)

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Boris Stein 11/15/2024



to Bryan ▾

Lol, wow.
Take your pills

On Fri, Nov 15, 2024, 6:55 AM Bryan <76927575-0918-49c1-9d34-0a9196bf3070@crm.wix.com> wrote:

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Boris Stein 11/15/2024



to Bryan ▾

Collecting to add to your criminal case for harassment, your fucking IP will be searched warrant

On Fri, Nov 15, 2024, 7:57 AM Bryan <ad78ec7b-ed50-409d-9710-0c1ba0f5ccc3@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds



Imagine a thick,

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Boris Stein 11/15/2024



to Bryan ▾

CEASE and DESIST any and all communication.
Normally 8 to 10 of CEASE and DESIST notifications are
enough for filing a separate police report

On Fri, Nov 15, 2024, 7:35 PM Bryan <755ce273-3755-476d-8087-5bbeec8f1947@crm.wix.com> wrote:

Bryan just sent you an email on Los Angeles German Shepherds



Cease and DESIST any
and all retardation!

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Boris Stein 11/15/2024



to Bryan ▾

Cease and DESIST any and all communication

On Fri, Nov 15, 2024, 7:48 PM Bryan <c8b8c852-0e28-45b8-91d3-72a45717c51e@crm.wix.com> wrote:

11



Boris Stein 11/15/2024



to Bryan ▾

CEASE and DESIST any and all communication

On Fri, Nov 15, 2024, 7:35 PM Bryan <755ce273-3755-476d-8087-5bbeec8f1947@crm.wix.com> wrote:

Show quoted text

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Boris Stein 11/15/2024

to Bryan ▾



CEASE and DESIST any and all communication

On Fri, Nov 15, 2024, 7:43 PM Bryan <65841239-f71f-42c6-84d3-af4adff5baf3@crm.wix.com> wrote:

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Boris Stein 11/15/2024

to Bryan ▾



CEASE and DESIST any and all communication

On Fri, Nov 15, 2024, 7:20 PM Bryan <e51fac6a-7c43-4612-8c00-7538601ae0a9@crm.wix.com> wrote:

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Boris Stein 11/15/2024



to Bryan ▾

CEASE and DESIST any and all communication

On Fri, Nov 15, 2024, 5:48 PM Bryan <fa269bdc-4c3c-43ac-b642-633ec3849d08@crm.wix.com> wrote:

.. ||



Boris Stein 11/15/2024



to Bryan ▾

Cease and DESIST any and all communication

On Fri, Nov 15, 2024, 5:43 PM Bryan <46caf5fe-cdae-453f-9b3a-77c083033cf6@crm.wix.com> wrote:

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Boris Stein 11/15/2024



to Bryan ▾

CEASE and DESIST any and all communication

On Fri, Nov 15, 2024, 5:42 PM Bryan <32e7ca26-4b4e-4abd-bea5-59e7e6d0f4be@crm.wix.com> wrote:

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Boris Stein 11/15/2024

Cease and DESIST any and all communication
On Fri, Nov 15, 2024, 8:44 AM Boris Stein



Boris Stein 11/15/2024

On Fri, Nov 15, 2024, 4:50 PM Bryan <43c15d6b-bf8c-4da7-aecb-4ade76035c30@crm.wix.com>



Boris Stein 11/15/2024

CEASE and DESIST any and all communication
On Fri, Nov 15, 2024, 5:42 PM Bryan <32e7ca26



Boris Stein 11/15/2024

Cease and DESIST any and all communication On
Fri, Nov 15, 2024, 5:43 PM Bryan <46caf5fe-cdae



Boris Stein 11/15/2024

CEASE and DESIST any and all communication
On Fri, Nov 15, 2024, 5:48 PM Bryan <fa269bdc

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EXHIBIT 40

(Report from web provider through which Bryan communicated with Zorikova. Report shows that initiation of communication had been done through “open search”)

Date	Form name	Name	Email	Phone	Traffic source	Traffic category
11/15/2024	Contact form B	Bryan	tzielnayrb@gmail.com		Google	Organic search

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02/14/2025

By: Alla Zorikova

Alla Zorikova, Plaintiff
5644 Park Oak Place
Los Angeles, CA 90068
Stevejohn19732017@gmail.com
323-209-5186

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