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March 11, 2022

Nabiel C. Ahmed  
Law Office of Nabiel Ahmed  
2500 Old Crow Canyon Road, Suite 525  
San Ramon, CA 94583-1627

Re: Fremont Toyota vs. Robert Kiraly  
Alameda County Superior Court, Case No: 21CV004608  
Berliner Cohen vs. Robert Kiraly  
Alameda County Superior Court, Case No: 21CV005860  
Our File No.: 21653-032

Dear Mr. Ahmed:

Pursuant to your request, enclosed please find the full Petitions for Workplace Violence Restraining Order; Temporary Restraining Orders; Notice of Court Hearing and Order on Request to Continue Hearing in the above two referenced matters.

Very truly yours,

BERLINER COHEN, LLP

DONNA OLSON, Assistant To  
Christine H. Long  
E-Mail: donna.olson@berliner.com

:dmo  
Enclosures

4893-7041-1284v1  
DOLSON21653032



5 Reason Court Date Is Rescheduled

a.  There is good cause to reschedule the court date (check one):

(1)  The petitioner has not served the respondent.

(2)  Other: To hear all related matters together. 22CV005860, 21CV004608,  
21CV004610.

b.  This is the first time that the respondent has asked for more time to prepare.

c.  The court reschedules the court date on its own motion.

6 Serving (Giving) Order to Other Party

The request to reschedule was made by the:

a.  Petitioner (Employer)

b.  Respondent

c.  Court

(1)  You do not have to serve the respondent because they or their lawyer were at the court date or agreed to reschedule the court date.

(1)  You do not have to serve the petitioner because they or their lawyer were at the court date or agreed to reschedule the court date.

(1)  Further notice is not required.

(2)  You must have the respondent personally served with a copy of this order and a copy of all documents listed on form WV-109, item 6, by (date): \_\_\_\_\_

(2)  You must have the petitioner personally served with a copy of this order by (date): \_\_\_\_\_

(2)  The court will mail a copy of this order to all parties by (date): 02/17/2022

(3)  You must serve the respondent with a copy of this order. This can be done by mail. You must serve by (date): \_\_\_\_\_

(3)  You must serve the petitioner with a copy of this order. This can be done by mail. You must serve by (date): \_\_\_\_\_

(3)  Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(4)  Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(4)  Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**This is a Court Order.**



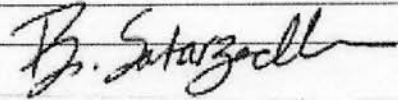
**7**  **No Fee to Serve (Notify) Respondent**       **Ordered**       **Not Ordered**

The sheriff or marshal will serve this order for free because:

- a.  The order is based on unlawful violence, a credible threat of violence, or stalking.
- b.  The person in **1** is entitled to a fee waiver.

**8**  **Other Orders**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



Date: 02/17/2022

**Bentrieh Satarzadeh / Commissioner**  
Judicial Officer



**Request for Accommodations**

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

**Instructions to Clerk**

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

**—Clerk's Certificate—**

Clerk's Certificate

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

[seal]



Date: FEB 17 2022

Clerk, by , Deputy

**This is a Court Order.**



Clerk stamps date here when form is filed.

**1 Petitioner (Employer)**

a. Name: Fremont Toyota  
Lawyer for Petitioner (if any for this case):  
Name: Christine Heather Long State Bar No.: 199676  
Firm Name: Berliner Cohen LLP

b. Address (If you have a lawyer, give your lawyer's information.):

Address: 10 Almaden Blvd 11th Floor  
City: San Jose State: CA Zip: 95113  
Telephone: (408) 286-5800 Fax: 408-998-5388  
E-Mail Address: christine.long@berliner.com

**FILED**  
Superior Court of California  
County of Alameda  
12/23/2021  
Clerk of the Court / Clerk of the Court  
By: Alisha McCovey Deputy  
Alisha McCovey

Fill in court name and street address:  
**Superior Court of California, County of Alameda**  
Alameda  
Hayward Hall of Justice  
24405 Amador Street  
Hayward, CA. 94544

Fill in case number:  
**Case Number:**  
21CV004608

**2 Employee in Need of Protection**

Full Name: Mark Hashimi

**3 Respondent (Person From Whom Protection Is Sought)**

Full Name: Robert Kiraly

*The court will complete the rest of this form.*

**4 Notice of Hearing**

**A court hearing is scheduled on the request for restraining orders against the respondent:**

Hearing Date → Date: 02/17/2022 Time: 09:00 Name and address of court if different from above:  
Dept.: 519 Room: \_\_\_\_\_  
\_\_\_\_\_

**5 Temporary Restraining Orders** (Any orders granted are on Form WV-110, served with this notice.)

a. Temporary Restraining Orders for personal conduct and stay away orders as requested in Form WV-100, Request for Workplace Violence Restraining Orders, are (check only one box below):

- (1)  All **GRANTED** until the court hearing.
- (2)  All **DENIED** until the court hearing. (Specify reasons for denial in b, below.)
- (3)  Partly **GRANTED** and partly **DENIED** until the court hearing. (Specify reasons for denial in b, below.)



b. Reasons that Temporary Restraining Orders as requested in Form WV-100, *Petition for Workplace Violence Restraining Orders*, for personal conduct or stay away are denied are:

- (1)  The facts as stated in Form WV-100 do not sufficiently show reasonable proof that the employee has suffered unlawful violence or a credible threat of violence by the respondent, and that great or irreparable harm to the employee would result if a temporary restraining order is not issued.
- (2)  Other (specify):  As stated on Attachment 5b.  
Request for broad prior restraint of online speech by Respondent is denied until the  
hearing based on constitutional requirements.

**6 Service of Documents by the Petitioner**

At least  five  \_\_\_\_\_ days before the hearing, someone age 18 or older—not you or anyone to be protected—must personally give (serve) a court file-stamped copy of this Form WV-109, *Notice of Court Hearing*, to the respondent along with a copy of all the forms indicated below:

- a. WV-100, *Petition for Workplace Violence Restraining Orders* (file-stamped)
- b.  WV-110, *Temporary Restraining Order* (file-stamped) **IF GRANTED**
- c. WV-120, *Response to Petition for Workplace Violence Restraining Orders* (blank form)
- d. WV-120-INFO, *How Can I Respond to a Petition for Workplace Violence Restraining Orders?*
- e. WV-250, *Proof of Service of Response by Mail* (blank form)
- f.  Other (specify): \_\_\_\_\_ *K.M. Evans*

Date: 12/23/2021

*K.M. Evans*  
Judicial Officer **K. Evans / Judge**

**To the Petitioner:**

- The court cannot make the restraining orders after the court hearing unless the respondent has been personally given (served) a copy of your request and any temporary orders. To show that the respondent has been served, the person who served the forms must fill out a proof of service form. Form WV-200, *Proof of Personal Service*, may be used.
- For information about service, read Form WV-200-INFO, *What Is "Proof of Personal Service"?*
- If you are unable to serve the respondent in time, you may ask for more time to serve the documents. Use Form WV-115, *Request to Continue Court Hearing and to Reissue Temporary Restraining Order*.

**To the Respondent**

- If you want to respond to the request for orders in writing, file Form WV-120, *Response to Request for Workplace Violence Restraining Orders*, and have someone age 18 or older—**not you or anyone to be protected**—mail it to the petitioner.
- The person who mailed the form must fill out a proof of service form. Form WV-250, *Proof of Service of Response by Mail*, may be used. File the completed form with the court before the hearing and bring a copy with you to the court hearing.
- Whether or not you respond in writing, go to the hearing if you want the judge to hear from you before making an order. You may tell the judge why you agree or disagree with the orders requested.
- You may bring witnesses and other evidence.
- **At the hearing, the judge may make restraining orders against you that could last up to three years and may order you to sell or turn in any firearms that you own or possess.**



**Request for Accommodations**

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

*(Clerk will fill out this part.)*

**—Clerk's Certificate—**

I certify that this *Notice of Court Hearing* is a true and correct copy of the original on file in the court.



**JAN 04 2022**

Date: \_\_\_\_\_

Clerk, by \_\_\_\_\_, Deputy

Clerk stamps date here when form is filed.

**1 Petitioner (Employer)**

a. Name: Fremont Toyota  
 Lawyer for Petitioner (if any, for this case):  
 Name: Christine Heather Long State Bar No.: 199676  
 Firm Name: Berliner Cohen LLP

b. Your Address (If you have a lawyer, give your lawyer's information.):  
 Address: 10 Almaden Blvd 11th Floor  
 City: San Jose State: CA Zip: 95113  
 Telephone: (408) 286-5800 Fax: 408-998-5388  
 E-Mail Address: christine.long@berliner.com

**FILED**  
 Superior Court of California  
 County of Alameda  
 12/23/2021  
 Chad Flake, Executive Officer / Clerk of the Court  
 By: Alisha McCovey Deputy  
 Alisha McCovey

Fill in court name and street address:

**Superior Court of California, County of Alameda**  
 Alameda  
 Hayward Hall of Justice  
 24405 Amador Street  
 Hayward, CA. 94544

**2 Employee (Protected Person)**

Full Name: Mark Hashimi

Court fills in case number when form is filed.

**3 Respondent (Restrained Person)**

Full Name: Robert Kiraly  
 Description:

**Case Number:**  
21CV004608

Sex:  M  F Height: \_\_\_\_\_ Weight: \_\_\_\_\_ Date of Birth: \_\_\_\_\_  
 Hair Color: \_\_\_\_\_ Eye Color: \_\_\_\_\_ Age: 63 Race: \_\_\_\_\_  
 Home Address (if known): 4546 El Camino Real Suite B10  
 City: Los Altos State: CA Zip: 94022  
 Relationship to Employee: Agent of former disgruntled customer

**4 [X] Additional Protected Persons**

In addition to the employee, the following family or household members or other employees are protected by the temporary orders indicated below:

Full Name	Sex	Age	Household Member?	Relation to Employee
<u>Katheryn Hashimi Campos</u>	<u>F</u>	<u>45</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Spouse</u>
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Additional protected persons are listed at the end of this Order on Attachment 4.

**5 Expiration Date**

This Order expires at the end of the hearing scheduled for the date and time below:

Date: 02/17/2022 Time: 09:00  a.m.  p.m.

**This is a Court Order.**





**To the Respondent:**

The court has issued the temporary orders checked as granted below. If you do not obey these orders, you can be arrested and charged with a crime. You may have to go to jail for up to one year, pay a fine of up to \$1,000, or both.

**6 Personal Conduct Orders**

Not Requested     Denied Until the Hearing     Granted as Follows:

- a. You are ordered **not** do the following things to the employee  
 and to the other protected persons listed in (4):
  - (1)  Harass, molest, strike, assault (sexually or otherwise), batter, abuse, destroy personal property of, or disturb the peace of the person.
  - (2)  Commit acts of violence or make threats of violence against the person.
  - (3)  Follow or stalk the person during work hours or to or from the place of work.
  - (4)  Contact the person, either directly or indirectly, in **any** way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by e-mail, by fax, or by other electronic means.
  - (5)  Enter the workplace of the person.
  - (6)  Take any action to obtain the person's address or locations. If this item is not checked, the court has found good cause not to make this order.
  - (7)  Other (*specify*):  
 Other personal conduct orders are attached at the end of this Order on Attachment 6a(7).

Threaten safety or privacy of the protected employee or other protected person in person or through online activity or direct or encourage others to threaten the safety or privacy of the protected employee or other protected person.

- b. Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this order. However, you may have your papers served by mail on the petitioner.

**7 Stay-Away Order**

Not Requested     Denied Until the Hearing     Granted as Follows:

- a. You **must** stay at least 100 yards away from (*check all that apply*):
  - (1)  The employee
  - (2)  Each other protected person listed in (4)
  - (3)  The employee's workplace
  - (4)  The employee's home
  - (5)  The employee's school
  - (6)  The employee's children's school
  - (7)  The employee's children's place of child care
  - (8)  The employee's vehicle
  - (9)  Other (*specify*):  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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

**This is a Court Order.**



**8 No Guns or Other Firearms and Ammunition**

- a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get guns, other firearms, or ammunition.
- b. You must:
  - (1) Sell to or store with a licensed gun dealer or turn in to a law enforcement agency any guns or other firearms in your immediate possession or control. This must be done within 24 hours of being served with this Order.
  - (2) File a receipt with the court within 48 hours of receiving this Order that proves that your guns or firearms have been turned in, sold, or stored. *(You may use Form WV-800, Proof of Firearms Turned In, Sold, or Stored for the receipt.)*
- c.  The court has received information that you own or possess a firearm.

**9 Other Orders**

Not Requested     Denied Until the Hearing     Granted as Follows *(specify):*  
Request for broad prior restraint of online speech by Respondent is denied until the hearing.

Additional orders are attached at the end of this Order on Attachment 9.

**To the Petitioner:**

**10 Mandatory Entry of Order Into CARPOS Through CLETS**

This Order must be entered into the California Restraining and Protective Order System (CARPOS) through the California Law Enforcement Telecommunications System (CLETS). *(Check one):*

- a.  The clerk will enter this Order and its proof-of-service form into CARPOS.
- b.  The clerk will transmit this Order and its proof-of-service form to a law enforcement agency to be entered into CARPOS.
- c.  By the close of business on the date that this Order is made, the employer or the employer's lawyer should deliver a copy of the Order and its proof-of-service form to the law enforcement agencies listed below to enter into CARPOS:

Name of Law Enforcement Agency

Address (City, State, Zip)

Additional law enforcement agencies are listed at the end of this Order on Attachment 10.

**11 No Fee to Serve (Notify) Restrained Person     Ordered     Not Ordered**

The sheriff or marshal will serve this Order without charge because:

- a.  The Order is based on a credible threat of violence or stalking.
- b.  The petitioner is entitled to a fee waiver.

**This is a Court Order.**





⑫ Number of pages attached to this Order, if any: \_\_\_\_\_

Date: 12/23/2021**K. Evans / Judge***Judicial Officer***Warnings and Notices to the Restrained Person in ②****You Cannot Have Guns or Firearms**

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

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

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

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

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

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

**This is a Court Order.**

## Instructions for Law Enforcement

### Enforcing the Restraining Order

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

### Start Date and End Date of Orders

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

### If the Protected Person Contacts the Restrained Person

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

### Conflicting Orders—Priorities for Enforcement

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

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

(Clerk will fill out this part.)

### —Clerk's Certificate—

Clerk's Certificate

[seal]

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



Date: JAN 04 2022

Clerk, by

, Deputy

**This is a Court Order.**



Petition for Workplace Violence Restraining Orders

Clerk stamps date here when form is filed.

FILED
ALAMEDA COUNTY
DEC 23 2021
CLERK OF THE SUPERIOR COURT
By [Signature] Deputy

Fill in court name and street address:
Superior Court of California, County of
Alameda
1225 Fallon Street
Oakland, CA 94612
Rene C. Davidson Courthouse

Court fills in case number when form is filed.
Case Number:
21CV004608

Read How Do I Get an Order to Prohibit Workplace Violence (form WV-100-INFO) before completing this form. NOTE: Petitioner must be an employer with standing to bring this action under Code of Civil Procedure section 527.8. Also fill out Confidential CLETS Information (form CLETS-001) with as much information as you know.

1 Petitioner (Employer)

a. Name: Fremont Toyota
is a [X] corporation [ ] sole proprietorship
[ ] (specify):
and is filing this suit on behalf of the employee identified in item 2.
b. Lawyer for Petitioner (if any for this case)
Name: Christine H. Long State Bar No.: 199676
Firm Name: Berliner Cohen LLP

Petitioner's Address (If the petitioner has a lawyer, give the lawyer's information.)

c. Address: 10 Almaden Blvd., 11th Floor
City: San Jose State: CA Zip: 95113
Telephone: 408-286-5800 Fax: 408-998-5388
E-Mail Address: christine.long@berliner.com

2 Employee in Need of Protection

Full Name: Mark Hashimi
Sex: [X] M [ ] F Age: 48

3 Respondent (Person From Whom Protection Is Sought)

Full Name: Robert Kiraly Age: 63
Address (if known): 4546 El Camino Real, Ste B10
City: Los Altos State: CA Zip: 94022

4 Additional Protected Persons

a. Are you asking for protection for any family or household members of the employee or for any other employees at the employee's workplace or at other workplaces of the petitioner?

[X] Yes [ ] No (If yes, list them):

Table with 5 columns: Full Name, Sex, Age, Household Member?, Relationship to Employee. Row 1: Kathryn Hashimi Campos, F, 45, [X] Yes [ ] No, Spouse.

[ ] Additional protected persons are listed in Attachment 4a.

This is not a Court Order.

4 b. Why do these people need protection? (Explain):

Response is stated in Attachment 4b.

Respondent has cyberstalked and publicly accused them of running a Muslim-run organized crime ring, being members of a Muslim gang, and employing Jihadi. Posted employee's photo and home address online.

5 Relationship of Employee and Respondent

a. How does the employee know the respondent? (Describe):  Response is stated in Attachment 5a.

Respondent is working with a former customer, Brian Martin (WV-TRO against Brian Martin filed concurrently) to electronically harass Petitioner and employee.

b. Respondent  is  is not a current employee of petitioner. (Explain any decision to retain, terminate, or otherwise discipline the respondent):  Response is stated in Attachment 5b.

6 Venue

Why are you filing in this county? (Check all that apply):

a.  The respondent lives in this county.

b.  The respondent has caused physical or emotional injury to the petitioner's employee in this county.

c.  Other (specify): \_\_\_\_\_

7 Other Court Cases

a. Has the employee or any of the persons named in 4 been involved in another court case with the respondent?

No  Yes 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"/> Workplace Violence	_____	_____	_____
(2) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(3) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(4) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(5) <input type="checkbox"/> Paternity, Parentage, Child Support	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Small Claims	_____	_____	_____
(9) <input type="checkbox"/> Postsecondary School Violence	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input type="checkbox"/> Other (specify):	_____	_____	_____

b. Are any restraining orders or criminal protective orders now in effect relating to the employee or any of the persons in 4 and the respondent?  No  Yes (If yes, attach a copy if you have one.)

**This is not a Court Order.**





8 f. For any of the incidents described above, did the police come?  Yes  No  I don't know

If yes, did the employee or the respondent receive an Emergency Protective Order?

Yes  No  I don't know

\*\* Fremont Police Department have started an investigation - Case No. 211209028 \*\*

If yes, the order protects (check all that apply):

the employee  the respondent  one or more of the persons in 4.

(Attach a copy of the order if you have one.)

**Check the orders you want**

9  **Personal Conduct Orders**

I ask the court to order the respondent not to do any of the following things to the employee or to any person to be protected listed in 4:

- a.  Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b.  Commit acts of unlawful violence on or make threats of violence to the person.
- c.  Follow or stalk the person during work hours or to or from the place of work.
- d.  Contact the person, either directly or indirectly, by any means, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
- e.  Enter the person's workplace.
- f.  Other (specify):  
 As stated in Attachment 9f.  
Please see Attachment 9f.

*The respondent will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.*

10 **Stay-Away Order**

a. I ask the court to order the respondent to stay at least 300 yards away from (check all that apply):

- (1)  The employee.
- (2)  The other persons listed in 4.
- (3)  The employee's workplace.
- (4)  The employee's home.
- (5)  The employee's school.
- (6)  The school of the employee's children.
- (7)  The place of child care of the employee's children.
- (8)  The employee's vehicle.
- (9)  Other (specify):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**This is not a Court Order.**



- 10 b. If the court orders the respondent to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job?  Yes  No (If no, explain):  
 Response is stated on Attachment 10b.

11 **Guns or Other Firearms and Ammunition**

Does the respondent own or possess any guns or other firearms?  Yes  No  I don't know

*If the judge grants a protective order, the respondent will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The respondent will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.*

12  **Temporary Restraining Order**

I request that a Temporary Restraining Order (TRO) be issued against the Respondent to last until the hearing. I am presenting form WV-110, *Temporary Restraining Order*, for the court's signature together with this Petition.

Has the Respondent been told that you were going to go to court to seek a TRO against him/her?

Yes  No (If you answered no, explain why below):

Reasons are stated in Attachment 12.

Please see Attachment 12.

13  **Request for Less Than Five Days' Notice of Hearing**

*You must have your papers personally served on the respondent at least five days before the hearing, unless the court orders a shorter time for service. (Form WV-200-INFO explains what is proof of personal service. Form WV-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:

Reasons are stated in Attachment 13.

14  **No Fee for Filing**

I ask that there be no filing fee because the respondent has threatened violence against the employee, or stalked the employee, or acted or spoken in a manner that has placed the employee in reasonable fear of violence.

**This is not a Court Order.**



Case Number: \_\_\_\_\_

**15**  **No Fee to Serve Orders**

I ask the court to order the sheriff or marshal to serve the respondent with the others for free because this request for orders is based on a credible threat of violence or stalking.

**16**  **Court Costs**

I ask the court to order the respondent to pay my court costs.

**17**  **Additional Orders Requested**

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

Additional orders requested are stated in Attachment 17.

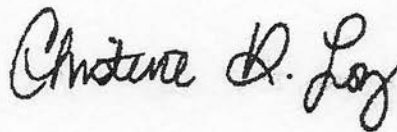
(1) Instruct by order of the court to remove any and all websites and publications relating to Fremont Toyota, Employee Mark Hashimi, any other employees of Fremont Toyota, Fremont Toyota's owner and family members.

(2) Cease sending communications that in any manner relate to Fremont Toyota, its employees, or its owner.

**18** Number of pages attached to this form, if any: 68

Date: 12/23/21

Christine H. Long  
*Lawyer's name (if any)*

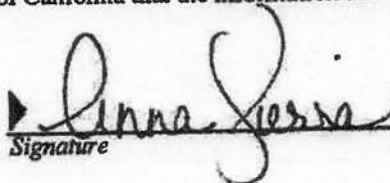


*Lawyer's signature*

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: 12-22-21

Anna Vierra  
*Name of petitioner*



*Signature*

Corporate Controller  
*Title*

**This is not a Court Order.**

**WV-100:  
ATTACHMENT 8(c)**



Petitioner: Fremont Toyota  
Respondent: Robert Kiraly

**Attachment 8c to Petition for Workplace Violence Restraining Order (WV-100)**

In or around June 2021, Respondent, Robert Kiraly (aka Old Coder), began working with Brian Martin, a former customer of Petitioner, to cyberstalk and electronically harass Petitioner and its employees.

Mr. Kiraly initially hired Mr. Martin to investigate his former landlord as he wanted to put his former landlord in jail. We are informed and believe Mr. Martin and Mr. Kiraly struck a deal that Mr. Martin would use his Private Investigator's license and Mr. Kiraly would use the unlawfully obtain information to launch a cyberattack on Petitioner and its employees. Please see Declaration of Christine H. Long. Request for WV-TRO against Brian Martin filed concurrently.

Since then, Mr. Kiraly and Mr. Martin have sent at least 75 harassing emails and created at least 18 websites in Fremont Toyota's, employees', and family members' names and likeness for the purpose of harassing and defaming them. Each website includes employees' and family members' personal contact information, home addresses, and pictures. See **Exhibits A - D**.

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

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

On or around December 13, 2021, counsel for Petitioner spoke with Fremont Police Department ("FPD"). We are informed and believe FPD have begun an investigation into both Mr. Martin and Mr. Kiraly (Case No. 211209028) and strongly encouraged filing the instant restraining orders.

Further, we are informed and believe that Mr. Kiraly has a history of mounting cyberattacks and harassing others, including his former landlord – which we are informed and believe he sent of 1,000 post-cards to, with horrendous false allegations, and sent up to 100 emails on any given day.

**I. Most Recent Incident**

On December 8, 2021, Mr. Kiraly emailed at least 27 email addresses publicly, and falsely, accusing Fremont Toyota and its general manager, Mark Hashimi (protected person), of being involved in a "RICO level" "Muslim-run organized crime operation" and part of a "gang" of "Muslims", that employs "Jihadi". Calling one of Mr. Hashimi's employees "quite



**the smug Jihadi”** and claiming the employee is **“embedded in a self-identified Muslim organization that employs means which are ... both immoderate and unlawful.”** Mr. Kiraly also asks, **“wasn’t it stone-cold stupid to pull this sh\*t with a P.I. who’s had two TV series made about him?”** Referring to Mr. Martin, and reasonably leading Petitioner and employees to believe that Mr. Martin is dangerous. See **Exhibit E**.

The December 8, 2021, email further directs its recipients to visit one of the several abovementioned websites Mr. Martin and Mr. Kiraly have created using the name and likeness of Petitioner’s employees, which includes several employees' personal contact information, home addresses, and pictures.

Mr. Kiraly’s and Mr. Martin’s tirade against Petitioner and its employees began when Mr. Martin unexpectedly took the position that there was something wrong with his loan, from a car he purchased from employer in 2020. Ally Bank, the bank which handled the loan confirmed, in October 2021, that there was nothing wrong or suspicious about the loan. **Exhibit F**. Nonetheless, Mr. Kiraly and Mr. Martin did not let up and shifted their tactics to hate speech to incite violence against Petition and its employees.

In the United States, the term “jihadi” is most commonly associated with Islamic Extremist terrorism. By wrongfully alleging Petitioner and its employees are Jihadi, **Mr. Kiraly has falsely, and publicly identified Petitioner and its employees as part of a terrorist organization** to incite violence against them in the workplace and in their homes.

Mr. Kiraly send this hate-speech filled email over two months after Ally Bank confirmed there was nothing wrong or suspicious with Mr. Martin’s loan. Clearly indicating to Petitioner and its employees that this was never about the loan. This was about harassing, defaming, and spewing hate speech at Petitioner and its employees to incite violence against them – for no reason whatsoever, other than presumably xenophobia and racism. And further indicating that Mr. Martin and Mr. Kiraly have no plans to stop cyberstalking and harassing Petitioner and its employees.

Fremont Toyota and its employees are afraid for their safety and the safety of their families. Mr. Kiraly’s conduct would place any reasonable person in fear for his or her safety, as well as the safety of his or her immediate family, and serves no legitimate purpose. Further, Mr. Kiraly and Mr. Martin live locally and close to Fremont Toyota, Mr. Hashimi, and several other employees. Accordingly, Fremont Toyota and Mr. Hashimi require the immediate intervention of the court to protect them from Mr. Kiraly and Mr. Martin.

## **II. History of Cyberstalking & Harassing Conduct**

In or around June 9, 2021, Mr. Hashimi received an email from Mr. Martin which included a copy of one of the websites Mr. Kiraly and Mr. Martin created using Fremont Toyota’s name and likeness, with comments dated June 3, 2021. See **Exhibit A**. Making known to that Mr. Kiraly and Mr. Martin have utilized Mr. Martin’s PI license to unlawfully investigate the personal lives of Mr. Hashimi and other employees and have publicly posted information about them on the websites (names, addresses, personal contact details). The website:

- Makes clear that **“Robert Kiraly aka OldCoder” is the “editor” of the website.**
- Boasts that **“OldCoder has never done an involuntary takedown.** He’s also fine with the idea of discussing threats of abuse of process with the State Bar.”
- Defames Fremont Toyota by wrongfully stating Fremont Toyota has “forged papers in order to steal thousands of dollars” and “stole and most likely destroyed the original paperwork” – after Ally Bank confirmed there were no issues with the loan.
- Notes that **“advice received to the simplest way to put Hugo [a Fremont Toyota employee] in prison will be welcome.”**

Mr. Kiraly and Mr. Martin also created email addresses, using Fremont Toyota’s name, for themselves including “me@fremonttoyota.org” and “brian@fremonttoyota.org”. These email addresses were designed to confuse individuals and otherwise drive traffic from Fremont Toyota to Mr. Kiraly and Mr. Martin’s vicious websites.

Mr. Kiraly continued to post emails exchanges between Mr. Martin and Mr. Hashimi on the websites, as well as create additional websites using employees’ name a likeness (18 in total that Petitioner is ware of), which included false allegations, defamatory statements about Petitioner and its employees, and harassing and threatening statements. For example:

- **False Allegations & Defamatory Statements:**
  - Petitioner and its employees “stole” documents and “altered” them to commit “fraud”. See **Exhibit B.**
  - “[Y]our people ... stole thousands of dollars from me and my family. It appears that you may have done this to other before.” See **Exhibit B.**
  - “[T]he conspiracy part of a potential criminal prosecution is pretty much a lock.” See **Exhibit C.**
  - “[I]t appears that Fremont Toyota may have committed forgery in the past.” See **Exhibit C.**
  - “This isn’t a situation where Hank Torian’s [late owner of Fremont Toyota] heirs can throw a few dollars at attorneys, clink the wine glasses and reach for the brie, and felonies go away.” See **Exhibit C.**
  - “[A] minimum of 4 people at the dealership engaged in a criminal conspiracy.” See **Exhibit C.**
- **Threats:**
  - The websites Mr. Kiraly created using Petitioner and its employees’ name and likeness are “going to be ranked pretty high in Google.” See **Exhibit B.**
  - If Mr. Hashimi does not respond to confirm he has received Mr. Martin’s several emails, “it may be necessary to have a hardcopy delivered to [Mr. Hashimi] at [his] residence” – making known that Mr. Martin and Mr. Kiraly have used Mr. Martin’s PI license to unlawfully stalk and investigate Mr. Hashimi to find his home address. See **Exhibit B.**
- **Pictures of Mr. Hashimi.** See **Exhibit B.**
- Statements targeting Mr. Hashimi in an attempt to threaten and intimidate him:

- “Your decision to support the possibly prosecutable crimes that Hugo has committed means, legally, that you’re ‘hosed’.” See **Exhibit B**.
- “Google ‘RICO law’ and ‘conspiracy charges.’ Are you able to follow that this may be a criminal matter involving 20 years in prison and not simply a civil matter?” See **Exhibit B**.
- “I have the option of communicating with third parties, including associates of yours who may not be delighted about the possibility of facing criminal charges on your behalf. I’ll proceed to do so.” See **Exhibit B**.
- “Mark, a threat to commit a crime can be treated as a crime. How deep a legal hole would you like to dig for yourself?” See **Exhibit B**.
- “Regarding ‘posting’: Our correspondence will be distributed directly to third parties as well as posted online. So will other events, facts, or information that may come to light.” See **Exhibit B**.
- “[the emails and websites will] all be in Google for the long term. So, it’ll work out best for you if you don’t dig that hole too deep.” See **Exhibit B**.
- “This isn’t just a civil tort. It’s a prosecutable crime, ‘Mark’. Or Kamal Sayed. It qualifies as a RICO case, you might be looking at 20 years in prison.” See **Exhibit B**.
- “‘Mark’, I’m not under representation yet nor have I filed a police report yet. This said, it’s advised that you and the other involved consider the matter carefully before you test the waters again to see what types of games you might be able to get away with.” See **Exhibit B**.

Moreover, on July 3, 2021, **Mr. Kiraly contacted Mr. Hashimi’s wife**, Kathryn Hashimi Campos, directly to her personal email account (cc-ing at least 9 others) explaining that he is “seeking to put [names omitted], two leading citizens in Antioch, in prison. In the course of researching ... I met a P.I. who’s had dealings with Mark Hashimi also known as Kamal Sayed Hashmin ... I’ve offered to act as website editor for the P.I. in this case.” See **Exhibit G**.

In the same email, Mr. Kiraly makes clear that he and Mr. Martin know where Ms. Campos lives, by referencing her street address. Mr. Kiraly also makes clear they are tracking Mr. Hashimi and asking if she “know[s] where “Mark” is located these days? We’d like to talk to some of his associates about a prosecutable crime that he’s committed. We know that he may be in a particular apartment in San Ramon.” He further invites her to visit the websites he and Mr. Martin have created using her husband’s name and likeness– MarkHashmini.org and FremontToyota.org. See **Exhibit G**.

The contents and structure of the abovementioned email can lead a reasonable person to believe Mr. Kiraly is unstable. Mr. Kiraly begins by discussing a third-party that he is trying to put in prison, then shifts to inquiring about Ms. Campo’s marital status, discussing his understanding of her divorce proceedings, and inviting Ms. Campos to join efforts to essentially take-down Mr. Hashimi.



On July 6, 2021, Mr. Kiraly emailed an attorney from Berliner Cohen (cc-ing Mr. Hashimi and 2 others) threatening:

- “[I]f the firm crosses the line into violations of standard or abuse of process, **that might not go as well as the attorneys might hope.**”
- **“Don’t even think about trying from DMCA related to the photo of Hashimi.”** (Referring to a photo of Mr. Hashimi posted on the websites)
- “I might add that I’ve never done an involuntary takedown in a decade and that **two attorneys who threatened abuse of process, including the principal figure at one firm, ended up leaving their jobs.**” See Exhibit H.

It is clear from the above that Mr. Kiraly does not intend to comply with any orders of the court to remove these websites that have been created using Petitioner and its employees’ names and likeness or stop harassing and defaming Petitioner and its employees even though Ally Bank has cleared them of any wrongdoing with respect to Mr. Martin’s car purchase.

Further, Mr. Hashimi received another email from Mr. Martin which included the July 25, 2021, website comments which make clear that Mr. Kiraly and Mr. Martin plan to continue to harass and defame Petitioner, its employees, and family members and will continue to post on the websites they have created in Petitioner and its employees’ name and likeness:

- “We won’t agree not to seek criminal charges. In fact, if we learn that Fremont-Toyota is continuing to engage in forgery and fraud, **it’s quite possible that we’ll turn our attention to this venue.**”
- **“Communication** with and about other Fremont-Toyota employees and/or associates **is planned and should be expected.**”
- **“The Fremont-Toyota Loan Fraud websites are #1 and #5** for short-tail searches already in most of the major search engines. **We expect to build on that.**” See Exhibit C.

The harassment continues. On September 1, 2021, Mr. Martin again emailed Mr. Hashimi and at least 17 others, a copy of the abovementioned websites Mr. Kiraly created with comments date August 28, 2021. See Exhibit D. **Copies of this email and the attachment were also directly mailed to Mr. Hashimi’s home and Mr. Torian’s (owner of Fremont Toyota) daughter’s home.** Mr. Kiraly and Mr. Martin expanded to additional websites using the name a likeness of Mr. Torian’s family members, created for the sole purpose of defaming the family’s foundation, Khachaturian Foundation:

- “The Khachaturian Foundation is a grey-area enterprise that **funnels stolen funds to charities** and, it appears, to the Armenian Apostolic Church. Grey-area means that the terms **“criminal enterprise” and “RICO”** may or may not apply but **the Khachaturian Foundation is funded in part regardless by felonies** that those in charge support without signs of hesitation.”
- “[T]he Khachaturian Foundation is **funded in part by the proceeds of prosecutable crimes.**”

The August 28, 2021, comments also specifically target Mr. Hashimi:

- **“Mark’, you’ve bet the farm – and possibly the future of the Khachaturian Foundation – on your estimate of the odds related to two of the situations that you and the Khachaturian’s face; i.e., civil litigation and criminal prosecution.”**

**Mr. Hashimi received the hard copy of the above mailed directly to his home address** shortly after his wife contacted the police inquiring about a restraining order against Mr. Martin and Mr. Kiraly. The timing is suspicious, as if Mr. Martin and Mr. Kiraly wanted to reinforce to Mr. Hashimi and his family that they do in fact know where he and his family live.

Finally, as set forth above, on December 8, 2021, two months after Ally Bank confirmed there was nothing wrong or suspicious about Mr. Martin’s loan, Mr. Kiraly emailed at least 27 email addresses publicly, and falsely, accusing Fremont Toyota and its general manager, Mark Hashimi (protected person), of being involved in a **“RICO level” “Muslim-run organized crime operation”** and part of a **“gang” of “Muslims”**, that employs **“Jihadi”**. Calling one of Mr. Hashimi’s employees **“quite the smug Jihadi”** and claiming the employee is **“embedded in a self-identified Muslim organization that employs means which are ... both immoderate and unlawful.”** Mr. Kiraly also asks, **“wasn’t it stone-cold stupid to pull this sh\*t with a P.I. who’s had two TV series made about him?”** Referring to Mr. Martin, and reasonably leading Petitioner and employees to believe that Mr. Martin is dangerous. See **Exhibit E.**

### **III. Focus on Race and Hate Speech Throughout Emails and Websites**

Throughout the websites and slew of emails Mr. Kiraly sent and published, there is a focus on highlighting minority individuals and pressing on their race inappropriately.

We are informed and believe that under California law:

A “hate crime” means a criminal act committed, in whole or in part, because of one or more of the following actual or perceived characteristics of the victim: (1) Disability. (2) Gender. (3) Nationality. (4) Race or ethnicity. (5) Religion. (6) Sexual orientation. (7) Association with a person or group with one or more of these actual or perceived characteristics. Penal Code section 422.55.

As described above, Electronic Harassment is a crime under the Penal Code. In this instance, Mr. Kiraly and Mr. Martin’s intentions for electronically harassing Petitioner and its employees is clear. Unprovoked, Mr. Kiraly resorted to racial epithets, addressing Petitioner’s employee as “quite the smug Jiahi,” accuses Mr. Hashimi of embedding himself in a Muslim organization that discriminates against non-Muslims allegedly employing means that are “immoderate and unlawful,” and continues his unabashed accusations claiming that Mr. Hashimi is involved in Muslim crime ring. See **Exhibit E.**

Moreover, Mr. Kiraly and Mr. Martin publicly accused that Mr. Torian’s family’s foundation is allegedly an organized crime organization funneling funds through the Armenian Church, on the websites created in Mr. Torian’s family’s names and likeness. See **Exhibit D.**



Further, as described above, on July 6, 2021, Mr. Kiraly contacted an attorney at Berliner Cohen, making several threats, and “advising” that it’s not a good idea for Berliner Cohen to get involved in this matter because Mr. Kiraly essentially isn’t afraid to fight dirty. See **Exhibit H**. Berliner Cohen has 65+ attorneys and the current managing partner is white. Yet, Mr. Kiraly specifically selected a non-white attorney to threaten the firm and try to intimidate from representing Petitioner.

This was never about the loan. This was about harassing, defaming, and spewing hate speech at Petitioner and its employees to incite violence against them – for no reason whatsoever.

#### **IV. Conclusion**

For the reasons set forth above, Mr. Kiraly’s conduct would place any reasonable person in fear for his or her safety, as well as the safety of his or her immediate family, and serves no legitimate purpose. Accordingly, Fremont Toyota, Mr. Hashimi, and protected persons require the immediate intervention of the court to protect them from Mr. Kiraly.

# EXHIBIT A

**From:** Brian Martin [<mailto:bmartininvestigations@yahoo.com>]  
**Sent:** Wednesday, June 09, 2021 8:41 AM  
**To:** [markhashimi@fremonttoyota.com](mailto:markhashimi@fremonttoyota.com)  
**Subject:** Fremont Toyota loan legal issue

I am a Fremont Toyota customer with a legal issue that probably needs to be looked at. Please view attached PDF.

Thank you,

Brian Martin

**Error! Filename not specified.**  
**Martin & Associates Investigations**

P.I. Lic. #21866

(925) 570-5033

420 Beatrice Court, Suite G3

Brentwood, CA 94513

[www.BMartinInvestigations.com](http://www.BMartinInvestigations.com)

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**Error! Filename not specified.**

**Error! Filename not specified.Error! Filename not specified.**

**Date:** June 03, 2021

**Subject:** Forgery at Fremont-Toyota auto dealership

**Short version:** Fremont-Toyota replaced auto-loan papers with forged papers in order to steal thousands of dollars. Two men, a "sales manager" named Abdullah aka "Abby" Shakoor and a "finance manager" named Hugo Alcantar are at the heart of the story. The exact involvement of each remains to be confirmed. The dealership as a whole is responsible for addressing the issue regardless.

Non-response isn't recommended. The forgery was clumsy and will be embarrassing to defend. Additionally, the story is expected to show up in Google for short-tail searches. Individuals will be named and discussed for legitimate and reasonable purposes.

It should be noted that the **fremonttoyota.org** website host, OldCoder, has never done an involuntary takedown. He's also fine with the idea of discussing threats of abuse of process with the State Bar.

**About this document:** This is release 210603. It supersedes lower-numbered releases. This document is distributed under Creative Commons BY-NC-SA 4.0. This means that anybody can quote and share it for non-commercial purposes. The rights-holder for attribution purposes is Brian Martin, P.I. The editor for this release was Robert Kiraly aka OldCoder.

This document was prepared originally using LibreOffice 7.1 under Laclin, a Linux distro of OldCoder's own design (see [laclin.com](http://laclin.com)).

If this document is delivered in error to parties who are neither associated with Fremont-Toyota nor interested in possible fraud at the dealership, regrets are offered.

**Websites:**

<a href="https://fremonttoyota.org/">https://fremonttoyota.org/</a>	or <a href="http://www.fremonttoyota.org">www.fremonttoyota.org</a>
<a href="https://fremonttoyota.news/">https://fremonttoyota.news/</a>	or <a href="http://www.fremonttoyota.news">www.fremonttoyota.news</a>
<a href="https://bmartininvestigations.com/">https://bmartininvestigations.com/</a>	or <a href="http://www.BMartinInvestigations.com">www.BMartinInvestigations.com</a>
<a href="https://oldcoder.org/">https://oldcoder.org/</a>	or <a href="http://www.oldcoder.org">www.oldcoder.org</a>

The mark "fremonttoyota" is used in domain names and website content under Nominative Use and Fair Use. For more on this subject, see the legal notes at the end of this document.

<b>Fremont-Toyota management:</b>	Mark Hashimi, General Manager
Anna Vierra, Controller	John Alocozy, General Sales Manager
Rachel Ghiringhelli, Company Contact	Hugo Alcantar, Finance Manager

**CC in separate emails to these email addresses:**

Mark Hashimi < <a href="mailto:markhashimi@fremonttoyota.com">markhashimi@fremonttoyota.com</a> >	John Alocozy < <a href="mailto:johنالocozy@fremonttoyota.com">johنالocozy@fremonttoyota.com</a> >
Rachel Ghiringhelli < <a href="mailto:rachelghiringhelli@gmail.com">rachelghiringhelli@gmail.com</a> >	Rachel Ghiringhelli < <a href="mailto:rreboton@bellsouth.net">rreboton@bellsouth.net</a> >
Abby Shokoor < <a href="mailto:abbyshokoor@yahoo.com">abbyshokoor@yahoo.com</a> >	Ferozan Shokoor < <a href="mailto:frozan11@yahoo.com">frozan11@yahoo.com</a> >
Farial Shokoor < <a href="mailto:farial_shokoor@yahoo.com">farial_shokoor@yahoo.com</a> >	Anna Vierra < <a href="mailto:anna.vierra@aol.com">anna.vierra@aol.com</a> >
Anna Vierra < <a href="mailto:anna.vierra@gmail.com">anna.vierra@gmail.com</a> >	Richard Vierra < <a href="mailto:richard.vierra@bellsouth.net">richard.vierra@bellsouth.net</a> >
Mohammed Hashimi < <a href="mailto:omar31415@gmail.com">omar31415@gmail.com</a> >	John Alocozy < <a href="mailto:alocozyj@sbcglobal.net">alocozyj@sbcglobal.net</a> >
Hugo Alcantar < <a href="mailto:halcantar@msn.com">halcantar@msn.com</a> >	Hugo Alcantar < <a href="mailto:hugo.alcantar@uswest.net">hugo.alcantar@uswest.net</a> >
Michelle Amin < <a href="mailto:michelleamina@yahoo.com">michelleamina@yahoo.com</a> >	Hugo Alcantar < <a href="mailto:hugo@fremonttoyota.com">hugo@fremonttoyota.com</a> >



Shokoors who are not “Abby” are asked to forward to “Abby”. Additionally, information related to “Abby” is respectfully requested for legitimate and reasonable purposes related to possible forgery by “Abby” of auto-loan documents. Mohammed Hashimi, Richard Vierra, and Michelle Amin are asked to forward to Mark Hashimi, Anna Vierra, and “John” aka Abdul Alocozy respectively.

Thank you for your time.

**CC to these street addresses:**

Abdullah “Abby” Shokoor  
223 Mount Pellier Street  
Tracy, CA 95304-5871

Rachel Ghiringhelli  
29050 Windemere Road  
Hayward, CA 94544

Anna Vierra  
2549 Dos Rios Drive #602  
San Ramon, CA 94583

Mark Hashimi c/o Mohammed Hashimi  
6586 Petunia Place  
Carlsbad, CA 92011-2516

Mark Hashimi c/o Fremont-Toyota  
5851 Cushing Parkway  
Fremont, CA 94538

“John” Alocozy aka Abdul Alocozy  
7707 Hillview Court  
Tracy, CA 95304-9198

Hugo Alcantar  
2545 Promenade Way  
Riverbank, CA 95367

Hugo Alcantar c/o Gaudencio Alcantar  
425 Oak Street  
Modesto, CA 95351

As background information, the Abdullah or “Abby” Wali Shokoor discussed here is believed to be the one who was alleged to have written bad checks in Virginia. Reference: Westmoreland General District, Case Number 193GC9300021800

John Alocozy’s real name seems to be Abdul Alocozy. He’s believed to be the “John Alocozy” who completed a Chapter 7 bankruptcy 10 years ago this year (2021).

“John” Abdul Alocozy and “Abby” Shokoor both seem to be from Virginia or to have connections to the State. It isn’t clear yet that this is or isn’t coincidental.

Hugo Alcantar has a real estate license; specifically, CA State Real Estate License #01487228. The license technically expired in March 2021 but has been extended. Research into related issues is in progress.

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**STATEMENT OF BRIAN MARTIN**

**1. Who am I?**

I’m Brian Martin, a licensed P.I. in the S.F. Bay Area and a long-time Toyota enthusiast. Long-time as in 25 years. My California P.I. license number is 21866.

Fremont-Toyota has contact information for me on file. Others such as news media are invited to email me using the following temporary email address:

brian@fremonttoyota.org

My professional website is: <https://bmartininvestigations.com/> or [www.BMartinInvestigations.com](http://www.BMartinInvestigations.com)

The “fremonttoyota” websites listed further up are not hosted or run by me. For notices and/or contact information related to the sites, see the Notices pages on the sites.

## **2. Me and my Toyotas.**

I have some experience with vehicle technology. I’m qualified to comment in this context.

I’ve worked at American Auto Body as a technician. I have advanced ICAR auto-body certifications. And I’ve worked as a crew chief for Jeremy Newberry’s race team.

Jeremy Newberry, to clarify, is a retired professional athlete who played for the 49ers, Raiders, and Chargers. On his team, I was responsible for maintaining a 700HP dirt modified car as well as a 360 CI powered wingless sprint car.

My first car was a 1969 Camaro. I restored it myself. The car was fast but it guzzled gas like there was no tomorrow. So, I replaced it circa 1994 with a 1987 Toyota SR5 pickup truck.

In 1995, I started working as a P.I. I bought a camper shell for the 1987 Toyota and this was sufficient to make it a good vehicle for surveillance.

The idea was that I’d park the Toyota in a subject’s neighborhood and jump from the driver’s seat through the little window into the back camper part. It was a little like Bo and Luke Duke. Then I’d sit in the camper part and observe the area without being observed myself.

A camper shell has a back door. But I couldn’t use that to enter the back of the Toyota because onlookers would be likely to see me doing so. Plus you can’t lock the door of a camper shell from inside and I needed to have the door locked. P.I. work is often mundane but P.I.s do get knives pulled on them sometimes. A locked door is the best policy.

The 1987 Toyota was serviceable as a P.I. vehicle but I married not long after purchasing it and we had our first child in due course. Space and comfort became considerations. As one example, we missed A/C. So, we got a Ford Explorer.

The Ford Explorer didn’t live up to Toyota standards. In 1999, therefore, we upgraded to a 2000 Toyota Tacoma. It was compatible with surveillance work as it had the same type of camper shell. It was comfortable enough. And it was as reliable as the rising of the sun.

I had a close friend who’d been a Toyota mechanic. He told me that if I ever had a component fail on my new truck I shouldn’t replace it with anything less than an original Toyota part. He explained that I’d be better off rebuilding the part instead of replacing it because of the difference in quality between Toyota Factory parts and so-called “replacement parts”.

I followed that philosophy religiously: rebuild rather than replace.

I’m guilty of not following the maintenance schedule as closely as I should have. But the 2000 Toyota Tacoma exceeded my expectations regardless. In the end, which came in December 2020, I’d gotten 427,000 miles out of the vehicle. That’s 17 drives around the world.

I still had the original alternator, starter transmission rear axle, A/C, etc. My friend was right. Toyota original parts quality is in a class of its own.

## **3. Expectation.**

I loved my 2000 Tacoma and I love the 2021 Tacoma that I replaced it with. However, I need to write about the circumstances.

A prompt and positive response from Fremont-Toyota is expected.

The response will be treated as public and will ultimately show up in Google. Non-response or negative response will mean that other organizations and venues will need to come into play. Such organizations and venues may include Toyota National, social media, and formal actions.

#### **4. Selecting a new Tacoma.**

In December 2021, my reliable 2000 Toyota Tacoma truck finally gave up the ghost at 427,000 miles.

My wife Janis found a new 2021 Toyota Tacoma advertised for sale on the Fremont-Toyota dealership website. This was a 2021 Toyota Tacoma SR Double Cab.

It was/is the one with a 2.7 L 4-cylinder engine. Horsepower: 159 hp @ 5,200 rpm. MPG: 20 city / 23 highway. It came standard with adaptive cruise control, nav system with Google satellite support, and other features. This was the truck for me.

On December 11, Janis and I went to see the vehicle. Our daughter Amanda, an adult and a credible witness, accompanied us.

#### **5. “Abby” Shokoor.**

A salesperson of Asian ancestry named “Kenny” – possibly Kenny Ye, but this is unconfirmed – showed us the Toyota Tacoma. We told Kenny that we were interested in a purchase. He went to get a “sales manager”.

The “sales manager” turned out to be somebody that I’d met before. This was Abdullah aka “Abby” Shokoor.

In the past, “Abby” was the proprietor of Brentwood Game Exchange in Brentwood, CA. Note: That business still exists but has confirmed that “Abby” is no longer involved with its operations.

About a decade ago, I installed a security camera system for Brentwood Game Exchange. “Abby” came across as the type that cuts corners. He asked me to change one of the lights while I was on a ladder. I wasn’t licensed to do that type of work and was concerned about safety as well. However, I agreed to do so.

“Abby” assured me that the power was off. Subsequently, it turned out that the power had been on the whole time.

To the best of my recollection, that incident was the extent of my past relationship with “Abby”. In an odd note, though, later in December 2020, somebody at Fremont-Toyota characterized me as a “buddy” of “Abby’s”. We’ll come back to that part.

#### **6. December 11, 2020 negotiations.**

The price stated in the listing was \$28,633. However, in negotiations on December 11, 2020, “Abby” dismissed the number. “There’s markup”, he said.

Sticker price was \$35,628. “Abby” didn’t demand that price, but he seemed to want to start with it in negotiations. My response was that the advertised price was \$28,633 and that I expected the dealership to honor the advertised price.

The ad may have included fine print that permitted the dealership to brush aside the stated price. However, if this is the case, it’s irrelevant because “Abby” ultimately agreed to sell me the Tacoma for \$28,633.

My wife Janis noticed something during the discussion that stood out to her.

We made it a point to explain to “Abby” that we’d come to Fremont-Toyota specifically to get the Tacoma that had been listed for \$28,633. “Abby” said, regardless, “You drove past 7 Toyota dealerships to get to Fremont-Toyota. Why did you come here?”

It might have just meant that “Abby” wasn’t a very good listener. That seems odd for a salesperson. I think it simply didn’t register for him that car buyers might take listed prices seriously and actually come in to buy cars at those prices.

### **7. The numbers.**

I can’t state the numbers part of the deal exactly because parties at Fremont-Toyota later stole and most likely destroyed the original paperwork. However, I can provide approx. numbers.

The dealership took \$500 off of the \$28,633 as a “rebate”. This reduced the effective price to \$28,133. To that, tax of about \$2,800 would have been added.

There was an \$85 document processing fee and a \$223 vehicle license fee plus \$287 for vehicle registration. \$20 for smog abatement. \$8.75 in California “Tire Fees”.

Fremont-Toyota added \$299 more for an optional service named “Forever Start”. Note: This service was apparently listed at \$500 and discounted by \$301 as part of the deal.

I made an initial down payment of \$7,000. Add it all up and my initial debt – taking the \$7,000 payment into account – was supposed to be about \$24,557.

When I looked at the paperwork, I noticed that Fremont-Toyota had added hundreds of dollars instead of subtracting them per the rebate. I saw the number \$28,995 instead of \$28,633 or \$28,133. Note: I’m not sure of the last digit.

The rest of the paperwork seemed to be in order. So, I decided to let the discrepancy go and signed the papers.

### **8. Strange Fremont-Toyota behavior after the sale.**

Starting shortly after the December 11, 2020 sale, I started to receive phone calls and texts from Fremont-Toyota that urged me to come back in. Some of the texts are shown on the next page.

The calls and texts were mostly from Hugo Alcantar, a “finance manager” at the dealership. One call that I haven’t tracked down may have been from somebody else.

Hugo Alcantar made statements similar to the following: “We forgot to get you to sign a document. Can you come in to sign it and bring all of the loan paperwork with you? We’re sorry about the trouble and will buy you a tank of gas to compensate you for your time.”

I resisted the requests to come back in. Why did Fremont-Toyota need me to drive so far just to sign a left-over form? Couldn’t they simply email a PDF? And why was the rest of the paperwork needed for this?

Another odd part was that Hugo or the other caller referred to me in one call as a “buddy” of “Abby’s”. I didn’t know what to make of that.

I spoke again with Hugo at 12:00 noon on December 29, 2020. I don’t remember if he called me or vice versa this time. He pressed me again to come in. I finally agreed to do so and drove to Fremont-Toyota in the mid-afternoon.



Hugo asked me for the paperwork and I gave it to him. He left, then returned with a piece of paper for me to sign. It was just a disclaimer. He returned the other paperwork to me during the discussion.

Hugo didn't give me a copy of the new form that I'd signed. At 6:34pm, I texted him and asked for a copy. That text is shown on the next page. At 10:29pm - this was still on December 29 - he emailed me the sticker image that is shown below.

**Editor's note:** The image below has been modified as follows: (a) slight rotation to make it more vertical (b) split into two pieces so as to make it fit better on printed pages and in website windows.


From: "Hugo Alcantar" <hugo@fremonttoyota.com>  
To: "BMARTININVESTIGATIONS@YAHOO.COM" <BMARTININVESTIGATIONS@YAHOO.COM>  
Sent: Tue, Dec 29, 2020 at 10:29 PM  
Subject: COPY

DEALER NAME / ADDRESS:  
**FREMONT TOYOTA**

STOCK NO. **21075** VEHICLE IDENTIFICATION NO.  
MAKE: **Toyota** MODEL: **MX192838**  
**Tacoma**

MANUFACTURER'S SUGGESTED RETAIL PRICE	<b>28633</b>
DEALER INSTALLED OPTIONS <b>Market Adjust</b>	<b>7995</b>

X *[Signature]*

DEALER INSTALLED OPTIONS SUBTOTAL	
<b>*Dealer's Price (Not The Manufacturer's Suggested Retail Price.)</b>	<b>\$38628</b>
<small>*Plus State and Local Taxes, License Fees, Processing Fees or Finance Charges, if any.</small>	
<b>FOR FUEL ECONOMY RATING CONSULT GAS MILEAGE GUIDE</b>	
<small>THE ESTIMATED MILEAGE FOR THIS MODEL IS TO BE USED TO COMPARE VEHICLES OF THIS MODEL WITH OTHER VEHICLES. ACTUAL MILEAGE WILL VARY WITH OPTIONS, DRIVING CONDITIONS, DRIVING HABITS AND VEHICLE'S CONDITION.</small>	
	
<small>THIS ADDENDUM HAS BEEN ADDED BY THE DEALER, NOT THE MANUFACTURER, TO REFLECT ANY ADDITIONAL CHARGES FOR ITEMS OR SERVICES PERFORMED. THIS IS NOT AN AUTHORIZED FACTORY STICKER.</small>	

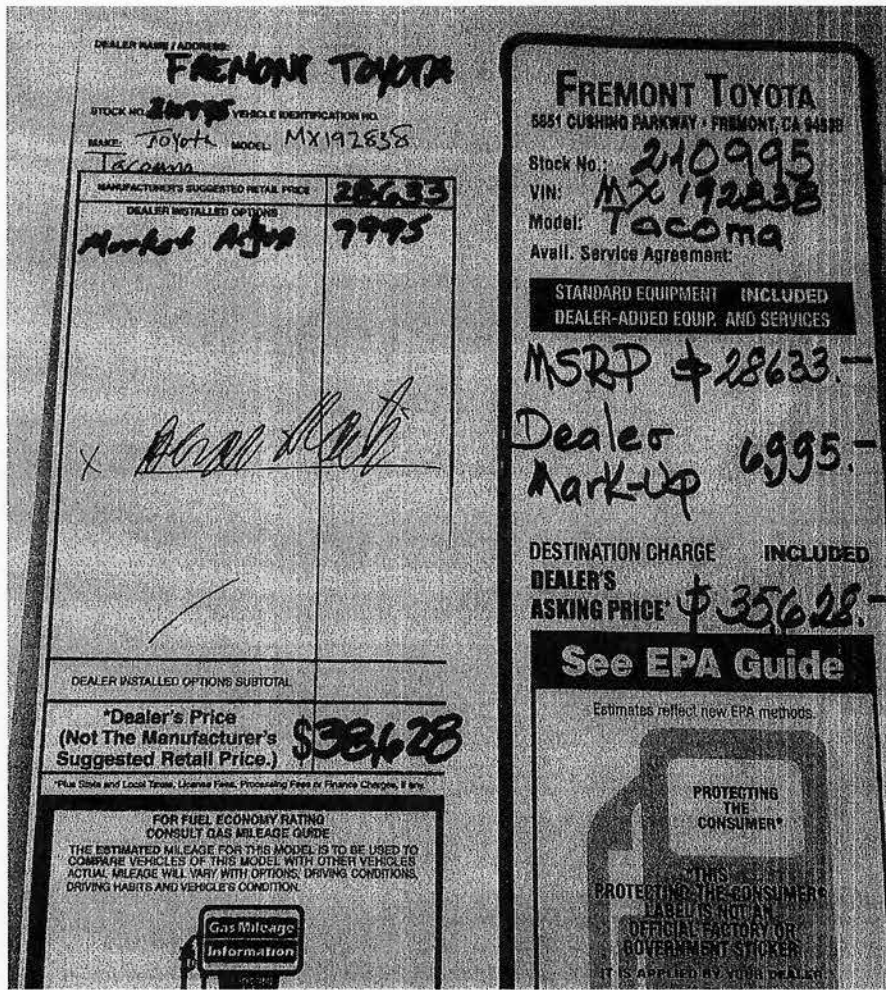
That isn't what I signed. It's a forgery that doesn't even make sense. I don't understand what it's even supposed to be.

As a related issue, I've checked the paperwork that Hugo handed back to me. I don't believe that it's the same paperwork which I handed to him.

**Editor's note:** Exactly what Hugo Alcantar's forgery is supposed to be isn't clear.

It seems to be a modified sticker intended to suggest that Brian Martin agreed to a "Market Adjustment" of \$9,995. However, the numbers don't add up in that case. It's also not part of a contract or agreement or anything that seems to be relevant.

**Editor's note:** For comparison purposes, here's a photograph of Hugo Alcantar's clumsy forgery next to the actual sticker. As a related note, advice related to the simplest way to put Hugo in prison will be welcome.



**Text messages between Hugo Alcantar and Brian Martin:**



## **9. Discovery of Fremont-Toyota auto-loan fraud.**

The loan payments were set at \$585.78 per month. My wife Janis has been handling them. The first payment was made on January 25, 2021. 5 payments total had been made as of the end of May 2021.

After Janis made the first payment in January, she told me the loan amount seemed to be \$30,000. I told her that that wasn't possible as we'd put \$7,000 down on a truck that had cost only about \$28,000 to begin with after the \$500 rebate.

I assumed initially that the incorrect loan amount was some sort of accounting issue that had a reasonable explanation. However, in the Spring, we needed to make decisions related to income-tax paperwork. As part of this, I reviewed the loan paperwork closely.

I was startled to see that the paperwork said I'd paid \$33,995 for the 2021 Tacoma. I never signed any such paperwork. The place where the number \$33,995 appeared is where I saw the \$28,995 figure [approx.] that I've mentioned further up.

The paperwork turned out to be a color photocopy. I believe that it's faked.

Hugo Alcantar or "Abby" Shokoor or other parties replaced pages in the loan paperwork after Hugo took the paperwork out of my hands and left the room with it for no reason that was explained to me.

It's not clear how these people chose the \$33,995 number. It's possible that they started with the \$35,628 sticker price and subtracted the smallest amount that they could realistically pretend had been arrived at in negotiations.

I made a phone call to Fremont-Toyota regarding the issue. I instructed the person who I spoke with to have "Abby" Shokoor phone me. No call has been received up to the date of this writing.

To be clear, further communication related to this issue should be in writing. A prompt and positive response from the dealership will be appreciated.

Non-response or negative response will necessitate the involvement of Toyota National, financial institutions, Google, social media, news media, and possibly legal counsel on both sides. Readers are invited to follow the story on these websites:

<https://fremonttoyota.org/> or [www.fremonttoyota.org](http://www.fremonttoyota.org)

<https://fremonttoyota.news/> or [www.fremonttoyota.news](http://www.fremonttoyota.news)

Additional websites may be added. Note: Initially the sites will be identical but they may evolve separately over time.

### **Legal notes and/or disclaimers:**

L1. The mark "fremonttoyota" is used at the domain-name and content levels under Nominative Use and Fair Use. It should be noted that DMCA is generally inapplicable in this context. Demands for domain-name takedowns should be submitted to the domain registrar. The domain registrar will forward them to the registrant. The registrant will then reject such demands and forward them along with analyses of the issues involved to Toyota National as well as to local news media and social media.

L2. For additional points related to the current matter, please see the Notices pages on the websites.

(end of document)

# EXHIBIT B



**Date:** July 16, 2021

**Subject:** Forgery at Fremont-Toyota auto dealership

**One-paragraph version:** Fremont-Toyota physically stole auto-loan papers and replaced them with literally forged versions. At least three people are involved: Mark Hashimi aka Kamal Sayed Hashimi, Abdullah Shokoor aka Abby Shokoor, and Hugo Alcantar. It's possible that they're doing this sort of thing to unwary Toyota buyers on a regular basis.

**Summary of story:**

A P.I. named Brian Martin purchased a Toyota Tacoma from Fremont-Toyota in December 2020. This was during one of Toyota National's Sale-a-Thons. The dealership didn't want to honor the sales price but did so after arguing about it. They were unhappy about the deal.

Hugo Alcantar, a finance manager at the dealership, nagged Brian after the sale to come in to sign some unspecified form and to bring the original loan papers with him.

On December 29, Brian agreed to do this so as to shut Hugo up. Hugo had Brian sign some type of disclaimer. Hugo then took the original papers out of Brian's hands, left the room with the papers, and returned forgeries to Brian.

Brian didn't realize until later that Hugo had replaced the papers. He did think that the disclaimer thing was fishy and asked Hugo to send him a copy of what he'd signed that day. Hugo emailed a clumsy forgery — grade-school level — that was apparently supposed to be Brian's agreement to pay \$6,000 more than had been agreed to.

The dealership decided to back up Hugo Alcantar. General Manager Mark Hashimi blustered as part of this but on July 06, 2021, a law firm named Berliner-Cohen seems to have told him that he was hosed. An hour or two later, Mark offered to settle.

You can see evidence such as text messages between the two men and a copy of what Hugo Alcantar emailed to Brian in the following sections. Hugo's email is close to conclusive evidence of forgery and loan fraud all by itself.

**About this document:** This is release 210716. It supersedes lower-numbered releases. This document is distributed under Creative Commons BY-NC-SA 4.0. This means that anybody can quote and share it for non-commercial purposes. The rights-holder for attribution purposes is Brian Martin, P.I. The editor for this release was Robert Kiraly aka OldCoder.

This document was prepared originally using LibreOffice 7.1 under Laclin, a Linux distro of OldCoder's own design (see laclin.com).

**Websites:**

<https://fremonttoyota.org/> – Main Fremont-Toyota Loan Fraud site  
<https://markhashimi.org/> – Mark Hashimi page

**Alternate domains:** (these presently go to the main site)

<https://abbyshokoor.com/>                      <https://annavierra.com/>  
<https://hugoalcantar.com/>                <https://johnalocozy.com/>  
<https://rachelghiringhelli.com/>        <https://fremonttoyota.news/>

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*Forgery at Fremont-Toyota auto dealership– July 16, 2021*

**Fremont-Toyota management:**

Anna Vierra, Controller  
Rachel Ghiringhelli, Company Contact

Mark Hashimi, General Manager  
John Alocozy, General Sales Manager  
Hugo Alcantar, Finance Manager

**CC in separate emails to these email addresses:**

Mark Hashimi <markhashimi@fremonttoyota.com>	John Alocozy <johnalocozy@fremonttoyota.com>
Rachel Ghiringhelli <rachelghiringhelli@gmail.com>	Rachel Ghiringhelli <rreboton@bellsouth.net>
Abby Shokoor <abbyshokoor@yahoo.com>	Ferozan Shokoor <frozan11@yahoo.com>
Farial Shokoor <farial_shokoor@yahoo.com>	Anna Vierra <anna.vierra@aol.com>
Anna Vierra <anna.vierra@gmail.com>	Richard Vierra <richard.vierra@bellsouth.net>
Mark Hashimi <markhashimi@gmail.com>	John Alocozy <alocozyj@sbcglobal.net>
Hugo Alcantar <halcantar@msn.com>	Hugo Alcantar <hugo.alcantar@uswest.net>
Michelle Amin <michelleamina@yahoo.com>	Hugo Alcantar <hugo@fremonttoyota.com>

Shokoors who are not “Abby” are asked to forward to “Abby”. Additionally, information related to “Abby” is respectfully requested for legitimate and reasonable purposes related to possible forgery by “Abby” of auto-loan documents. Mohammed Hashimi, Richard Vierra, and Michelle Amin are asked to forward to Mark Hashimi, Anna Vierra, and “John” aka Abdul Alocozy respectively.

Thank you for your time.

**CC to these street addresses:**

Abdullah “Abby” Shokoor  
223 Mount Pellier Street  
Tracy, CA 95304-5871

Anna Vierra  
2549 Dos Rios Drive #602  
San Ramon, CA 94583

Mark Hashimi c/o Fremont-Toyota  
5851 Cushing Parkway  
Fremont, CA 94538

Hugo Alcantar  
2545 Promenade Way  
Riverbank, CA 95367

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Hayward, CA 94544

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The dealership took \$500 off of the \$28,633 as a “rebate”. This reduced the effective price to \$28,133. To that, tax of about \$2,800 would have been added.

There was an \$85 document processing fee and a \$223 vehicle license fee plus \$287 for vehicle registration. \$20 for smog abatement. \$8.75 in California “Tire Fees”.

Fremont-Toyota added \$299 more for an optional service named “Forever Start”. Note: This service was apparently listed at \$500 and discounted by \$301 as part of the deal.

I made an initial down payment of \$7,000. Add it all up and my initial debt – taking the \$7,000 payment into account – was supposed to be about \$24,557.

When I looked at the paperwork, I noticed that Fremont-Toyota had added hundreds of dollars instead of subtracting them per the rebate. I saw the number \$28,995 instead of \$28,633 or \$28,133. Note: I’m not sure of the last digit.

The rest of the paperwork seemed to be in order. So, I decided to let the discrepancy go and signed the papers.

#### **8. Strange Fremont-Toyota behavior after the sale.**

Starting shortly after the December 11, 2020 sale, I started to receive phone calls and texts from Fremont-Toyota that urged me to come back in. Some of the texts are shown on page 7 below.

Forgery at Fremont-Toyota auto dealership- July 16, 2021

The calls and texts were mostly from Hugo Alcantar, a "finance manager" at the dealership. One call that I haven't tracked down may have been from somebody else.

Hugo Alcantar made statements similar to the following: "We forgot to get you to sign a document. Can you come in to sign it and bring all of the loan paperwork with you? We're sorry about the trouble and will buy you a tank of gas to compensate you for your time."

I resisted the requests to come back in. Why did Fremont-Toyota need me to drive so far just to sign a left-over form? Couldn't they simply email a PDF? And why was the rest of the paperwork needed for this?

Another odd part was that Hugo or the other caller referred to me in one call as a "buddy" of "Abby's". I didn't know what to make of that.

I spoke again with Hugo at 12:00 noon on December 29, 2020. I don't remember if he called me or vice versa this time. He pressed me again to come in. I finally agreed to do so and drove to Fremont-Toyota in the mid-afternoon.

Hugo asked me for the paperwork and I gave it to him. He left, then returned with a piece of paper for me to sign. It was just a disclaimer. He returned the other paperwork to me during the discussion.

Hugo didn't give me a copy of the new form that I'd signed. At 6:34pm, I texted him and asked for a copy. That text is shown on the next page. At 10:29pm - this was still on December 29 - he emailed me the sticker image that is shown below.

**Editor's note:** The image below has been modified as follows: (a) slight rotation to make it more vertical (b) split into two pieces so as to make it fit better on printed pages and in website windows.

From: "Hugo Alcantar" <hugo@fremonttoyota.com>  
To: "BMARTININVESTIGATIONS@YAHOO.COM" <BMARTININVESTIGATIONS@YAHOO.COM>  
Sent: Tue, Dec 29, 2020 at 10:29 PM  
Subject: COPY

DEALER NAME / ADDRESS: <b>FREMONT TOYOTA</b>	
STOCK NO. <b>210995</b>	VEHICLE IDENTIFICATION NO.
MAKE: <b>Toyota</b>	MODEL: <b>MX192838</b>
<b>Tacoma</b>	
MANUFACTURER'S SUGGESTED RETAIL PRICE	<b>28633</b>
DEALER INSTALLED OPTIONS <b>Market Adjust</b>	<b>7995</b>
<i>[Signature]</i>	

DEALER INSTALLED OPTIONS SUBTOTAL	
<b>*Dealer's Price (Not The Manufacturer's Suggested Retail Price.)</b>	<b>\$38628</b>
<small>*Plus State and Local Taxes, License Fees, Processing Fees or Finance Charges, if any.</small>	
<b>FOR FUEL ECONOMY RATING CONSULT GAS MILEAGE GUIDE</b>	
<small>THE ESTIMATED MILEAGE FOR THIS MODEL IS TO BE USED TO COMPARE VEHICLES OF THIS MODEL WITH OTHER VEHICLES. ACTUAL MILEAGE WILL VARY WITH OPTIONS, DRIVING CONDITIONS, DRIVING HABITS AND VEHICLE'S CONDITION.</small>	
<small>THIS ADDENDUM HAS BEEN ADDED BY THE DEALER, NOT THE MANUFACTURER, TO REFLECT ANY ADDITIONAL CHARGES FOR ITEMS OR SERVICES PERFORMED. THIS IS NOT AN AUTHORIZED FACTORY STICKER.</small>	





**Editor's note:** The "Fremont Toyota" sticker on the right above is the non-forged version of the dealership sticker that was originally, we think, on the front passenger-side window. The factory sticker is shown below in two parts. This one was originally on the rear passenger-side window. This image has been modified as follows: (a) It's been split into two parts so as to better fit it onto the page. (b) Some white space has been removed from the second part for the same reason.



DESC.: **TACOMA SR** 4X2 DOUBLE CAB  
 VIN: **5TFAX5GN0MX192838**  
 YR/MDL: 2021/7186A  
 CLR: SILVER SKY METALLIC/FB14 (01D6/14)  
 FINAL ASSEMBLY POINT: SAN ANTONIO, TEXAS, U.S.A.

**GOVERNMENT 5-STAR SAFETY RATINGS**

**Overall Vehicle Score** ★★★★★  
 Based on the combined ratings of frontal, side and rollover. Should ONLY be compared to other vehicles of similar size and weight.

**Frontal Crash** Driver Passenger ★★★★★  
 Based on the risk of injury in a frontal impact. Should ONLY be compared to other vehicles of similar size and weight.

**Side Crash** Front seat Rear seat ★★★★★  
 Based on the risk of injury in a side impact.

**Rollover** ★★★★★  
 Based on the risk of rollover in a single-vehicle crash.

Star ratings range from 1 to 5 stars (★★★★★) with 5 being the highest.  
 Source: National Highway Traffic Safety Administration (NHTSA)  
[www.safercar.gov](http://www.safercar.gov) or 1-888-327-4236

**STANDARD EQUIPMENT**

**MECHANICAL & PERFORMANCE**  
 - 2.7L DOHC 16V 4Cyl Engine w/Dual VVTI  
 159hp @ 5200rpm/180 lb-ft @ 3800rpm  
 - 6-Spd Automatic Transmission  
 - Automatic Limited-Slip Differential

**SAFETY & CONVENIENCE**  
 - Toyota Safety Sense P: Pre-Collision Sys w/Pedestrian Detection, Dynamic Radar Cruise Control, Lane Departure Alert  
 - Automatic High Beams  
 - Star Safety System  
 - Rear Backup Camera  
 - Safety Connect w/1-Year Trial

**EXTERIOR**  
 - 16-in Styled Steel Wheels  
 - Intermittent Wipers

**INTERIOR**  
 - Fabric-Trimmed Seats w/ Or Lumbar Support  
 - Audio - 7-in Touchscreen, 6 Speakers, HandsFree Bluetooth Phone/Music, USB Media Port, USB Charge-Ports, SiriusXM w/3-Month All Access Trial, Android Auto & Apple CarPlay Compatible

For Full Product Details:  
 Please Visit [Toyota.com/Tacoma](http://Toyota.com/Tacoma)

\*\*\*Full Tank of Gas\*\*\*

**EPA DOT Fuel Economy and Environment**

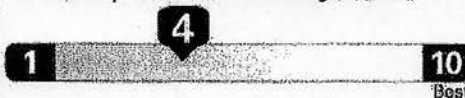
Gasoline Vehicle

**Fuel Economy**  
**21** MPG  
 Small Pickups range from 17 to 23 MPG. The best vehicle rates 141 MPG.  
 20 23  
 combined-city/hwy city highway  
 4.8 gallons per 100 miles

**You spend \$2,250**  
 more in fuel costs over 5 years compared to the average new vehicle.

**Annual fuel Cost**  
**\$1,950**

**Fuel Economy & Greenhouse Gas Rating** (tailpipe only)



**Smog Rating** (tailpipe only)



This vehicle emits 423 grams CO2 per mile. The best emits 0 grams per mile (tailpipe only). Producing and distributing fuel also create emissions. Learn more at [fuelconomy.gov](http://fuelconomy.gov).

Actual results will vary for many reasons, including driving conditions and how you drive and maintain your vehicle. The average new vehicle gets 27 MPG and costs \$7,500 to fuel over 5 years. Cost estimates are based on 15,000 miles per year at \$2.70 per gallon. MPGe is miles per gasoline gallon equivalent. Vehicle emissions are a significant cause of climate change and smog.

**fuelconomy.gov**  
 Calculate personalized estimates and compare vehicles





Forgery at Fremont-Toyota auto dealership- July 16, 2021

MANUFACTURER'S SUGGESTED RETAIL PRICE **\$28,980.00**

OPTIONAL EQUIPMENT

FE	50 State Emissions	
LL	SR Convenience Package: Includes remote keyless entry	230.00
2T	All-Weather Flr Liner/Door Sill Protector	248.00

DELIVERY PROCESSING AND HANDLING FEE 1,175.00

**TOTAL \$28,633.00**

The New Vehicle Limited Warranty provides 3-year/36,000-mile basic coverage, 5-year/50,000-mile powertrain coverage, plus 5-year/unlimited-mile corrosion perforation coverage. See Warranty and Maintenance Guide for details. An extended service contract may be available for the vehicle. Ask dealer for details.

Manufacturer's suggested retail price includes manufacturer's recommended pre-delivery service. Gasoline, license and title fees, applicable federal, state and local taxes and dealer and distributor installed options and accessories are not included in the manufacturer's suggested retail price.

ToyotaCare, which covers normal factory scheduled maintenance for two years or 25,000 miles, whichever occurs first, is included as part of the sales price of the vehicle for qualifying buyers. See participating dealer for eligibility and coverage details.

Delivered by Truck to: 04330  
FREMONT TOYOTA  
5851 CUSHING PARKWAY  
FREMONT CA94538



### 9. Discovery of Fremont-Toyota auto-loan fraud.

The loan payments were set at \$585.78 per month. My wife Janis has been handling them. The first payment was made on January 25, 2021. 5 payments total had been made as of the end of May 2021.

After Janis made the first payment in January, she told me the loan amount seemed to be \$30,000. I told her that that wasn't possible as we'd put \$7,000 down on a truck that had cost only about \$28,000 to begin with after the \$500 rebate.

I assumed initially that the incorrect loan amount was some sort of accounting issue that had a reasonable explanation. However, in the Spring, we needed to make decisions related to income-tax paperwork. As part of this, I reviewed the loan paperwork closely.

I was startled to see that the paperwork said I'd paid \$33,991 for the 2021 Tacoma. I never signed any such paperwork. The place where the number \$33,991 appeared is where I saw the \$28,995 figure [approx.] that I've mentioned further up.

The paperwork turned out to be a color photocopy. I believe that it's faked.

Hugo Alcantar or "Abby" Shokoor or other parties replaced pages in the loan paperwork after Hugo took the paperwork out of my hands and left the room with it for no reason that was explained to me.

It's not clear how these people chose the \$33,991 number. It's possible that they started with the \$35,628 sticker price and subtracted the smallest amount that they could realistically pretend had been arrived at in negotiations.

I made a phone call to Fremont-Toyota regarding the issue. I instructed the person who I spoke with to have "Abby" Shokoor phone me. No call has been received up to the date of this writing.

To be clear, further communication related to this issue should be in writing. A prompt and positive response from the dealership will be appreciated.

Non-response or negative response will necessitate the involvement of Toyota National, financial institutions, Google, social media, news media, and possibly legal counsel on both sides. Readers are invited to follow the story on this website:

<https://fremonttoyota.org/>

Additional websites may be added. Note: Initially the sites will be identical but they may evolve separately over time.

**10. Four-Square issue.**

There's an additional element to the story that's interesting.

Auto-loan negotiations may include something called a Four-Square. This is a worksheet which lists four basic parameters for a loan.

We were given a Four-Square. We remember that it included a price in the \$28,000 range – either \$28,133 or \$28,633 – and a monthly payment of \$585.78.

Subsequent to negotiations, we were sent to talk to a man in an office to finalize the paperwork. We don't know his last name but he gave his first name as Omar. Omar dug out the Four-Square, said "This copy is too messy, I'll need to redo it", and crumpled it up.

To the best of our knowledge, we were never provided with a replacement for the Four-Square that Omar destroyed.

One part that's worth noting – aside from Omar's odd need to destroy the Four-Square – is that the monthly payment of \$585.78 remained the same even though Hugo Alcantar changed the price later on to \$33,991.

This suggests that the dealership planned to charge \$33,991 from the start and that Omar was in on the plan to commit forgery and fraud along with, it appears, Mark Hashimi, Abby Shokoor, and Hugo Alcantar.

It follows from there that the forgery and loan fraud may have been part of a process that the group had worked through before. It seems unlikely that a group of 4 people would set up a complicated ad hoc plan to defraud just one buyer.

This is, therefore, possibly a RICO case.

**Appendix L. Legal notes and/or disclaimers.**

L1. The mark "fremonttoyota" is used at the domain-name and content levels under Nominative Use and Fair Use. It should be noted that DMCA is generally inapplicable in this context. Demands for domain-name takedowns should be submitted to the domain registrar. The domain registrar will forward them to the registrant. The registrant will then reject such demands and forward them along with analyses of the issues involved to Toyota National as well as to local news media and social media.

L2. For additional points related to the current matter, please see the Notices pages on the websites.

(Email appendix starts on next page)

**Appendix H. Email between Brian Martin and Mark Hashimi.**

**Editor's notes:**

(a) The photo of Mark Hashimi is used under about a ton of Fair Use related to prosecutable crimes that Mr. Hashimi is believed to have committed and/or be involved with.

(b) Brian Martin's email address has been replaced here with the one that he'd like third parties to use for communication related to Fremont-Toyota loan fraud.

(c) This is believed to be a fairly accurate transcription. However, the editor has assembled the thread manually from copies in different formats. So, there may be errors and omissions.

(d) Brian usually signs his emails with a standard template. To reduce use of vertical space, we've omitted part of the template here.

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**June 09, 2021: Martin to Hashimi**

Date: Wednesday, June 09, 2021 8:41am PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Fremont Toyota loan legal issue



I am a Fremont Toyota customer with a legal issue that probably needs to be looked at. Please view attached PDF.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com

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**June 11, 2021: Hashimi to Martin**

Date: Friday, June 11, 2021, 04:37pm PT  
From: Mark Hashimi <markhashimi@fremonttoyota.com>  
To: Brian Martin <brian@fremonttoyota.org>  
Subject: RE: Fremont Toyota loan legal issue



HI Mr. Martin, I have received your email and I will speak to the agents involved in your transaction and do more research and reach back to you. Please email me your documents that you signed with Hugo , contract and any other forms you signed.

Thank you  
Mark Hashimi

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**June 12, 2021: Martin to Hashimi**

**Editor's note:** The letter below is believed to have been sent to Mark Hashimi on June 12, 2021, but this is unconfirmed.

*Forgery at Fremont-Toyota auto dealership– July 16, 2021*

Date: Saturday, June 12, 2021, unconfirmed  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: RE: Fremont Toyota loan legal issue



Mr. Hashimi, good day. Please allow a few days for preparation of a response. Note, also, that it isn't possible to provide the original papers because Hugo Alcantar physically took some of them out of my hands and stole them. While you're waiting, by the way, would you ask Hugo what the forged sticker that he emailed me is even supposed to be? To see a copy, read the previous PDF. It's not a "he said-she said" issue; Fremont-Toyota is going to need to explain what that is. And why Hugo sent me that instead of the disclaimer that I signed.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com

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**June 17, 2021: Martin to Hashimi**

Date: Thursday, June 17, 2021, 2:28pm PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Fraud inquiry



**PLEASE NOTE**

This PDF file contains scans of 20 pages of paperwork related to the Fremont-Toyota transaction under discussion, plus this cover page, for a total of 21 pages. These are not scans of the original pages because Hugo Alcantar of Fremont-Toyota physically took original pages out of my hands on December 29, 2021 and stole them. In fact, the copies that were scanned to produce this PDF appear to be color photocopies that have been altered by Mr. Alcantar or other parties at Fremont-Toyota for the purposes of fraud. They are not originals with my original signature or signatures. Only Mr. Alcantar and/or his associates know where the originals are.

For additional information related to the transaction and the fraud in question, see the detailed PDF that was provided previously and/or the latest version of the PDF which may be found online on the following website: <https://fremonttoyota.org/>

Regards,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com

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**June 21, 2021: Martin to Hashimi**

Date: Monday, June 21, 2021 5:17pm PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Fraud Inquiry



Hello Mr Hashimi,



I hope this finds you well. I would like to confirm that you received the Email and PDF that was sent on 6/17/2021.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com

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**June 22, 2021: Hashimi to Martin**

Date: Tuesday, June 22, 2021, 11:05am PT  
From: Mark Hashimi <markhashimi@fremonttoyota.com>  
To: Brian Martin <brian@fremonttoyota.org>  
Subject: RE: Fraud Inquiry



Hello Brian, I did get an email but I did not understand the email, if you like to speak to me on the phone please call me on my cell 925-421-4479, I did pull your file and the signatures are the same on the contract and the last one you came and signed. Please let me know if you would like to talk, we value your business Mr. Martin!!!

Mark Hashimi

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**June 28, 2021: Martin to Hashimi**

Date: Monday, June 28, 2021 6:20pm PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Loan Fraud



Mr. Hashimi, it's a pleasure to hear from you.

01. If you didn't understand the email, that isn't a problem. Your customers, Toyota National, personal and business associates of yours, and parties of other types will understand the copy on the website perfectly well. We imagine that they'll be able to explain it to you in simple terms.

02. It's going to be ranked pretty high in Google, Mark. We're already on the first page for the following search. Go head, type the following 4 words into Google:

**fremont-toyota loan fraud**

**Editor's note: For this to work, you need to tell Google, when it asks, that the word "fraud" needs to be included. If you do that, these sites are at #1 in Google already as of July 2021.**

03. This said, are you able to point to the words in the following paragraph that you're not able to understand?

"These are not scans of the original pages because Hugo Alcantar of Fremont-Toyota physically took original pages out of my hands on December 29, 2021 and stole them. In fact, the copies that were scanned to produce this PDF appear to be color photocopies that have been altered by Mr. Alcantar or other parties at Fremont-Toyota for the purposes of fraud. They are not originals with my original signature or signatures. Only Mr. Alcantar and/or his associates know where the originals are."

If this is too difficult for somebody who presumably has at least a 6th Grade education to understand, we regret this.

04. We have text messages which prove that the post-sale meeting with Hugo took place. We also have the email that Hugo was foolish enough to send that evening. In fact, all of this is on the website.

What was the document that Hugo emailed even supposed to be, Mr. Hashimi? How will you explain it to Toyota National or in other venues?



05. Yes, the signatures match. The point isn't entirely clear. The pages in question are photocopies of the originals, so of course the signatures match. You're invited to review the originals. This would be a simple matter as they're in your possession.

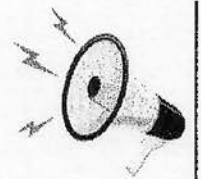
06. You suggested a phone call. Thank you, perhaps at a later date. For the time being, let's keep things in writing.

Phone calls aren't ruled out. However, please be advised that any phone calls between parties on this side and Fremont-Toyota may be recorded and transcribed.



07. On a related note:

Communications between any parties – including but not limited to transcriptions of phone calls – or statements, events, actions, or facts discovered that are believed to be related to Fremont-Toyota and/or parties associated directly or indirectly with the current matter may be quoted, analyzed, posted, blogged, emailed, snail-mailed, or distributed or made use of as is deemed appropriate.



08. We reserve the right to make use of Fremont-Toyota and/or Toyota intellectual property, as things proceed, under Fair Use and/or Nominative Use.

09. If you're not able to understand the paragraph quoted in part 03 above, the next step is logically for us to communicate with such other parties at Fremont-Toyota, Toyota National, and in various cities in California and elsewhere who may be able to understand the paragraph and explain it to you.

Thank you for your time.

Brian Martin  
Martin & Associates Investigations  
[www.BMartinInvestigations.com](http://www.BMartinInvestigations.com)

(continued on next page)

June 29, 2021: Hashimi to Martin



**Editor's note:** Mark Hashimi's response below to Brian Martin's inquiry doesn't help Fremont-Toyota's case much. It reads like a 6-year-old caught with his hand in the cookie jar, right down to the childish tone and poor grammar and spelling. We're not impressed.

Date: Tuesday, June 29, 2021 12:17pm PT  
From: Mark Hashimi <markhashimi@fremonttoyota.com>  
To: Brian Martin <brian@fremonttoyota.org>  
Subject: RE: Loan Fraud



Hi Brian, If you are accusing Fremont Toyota for Fraud, you need to proof it, I will have get in touch with my Attorney and I have your file in front of my with your signatures, I will take action about this!! you can go and post whatever you want. Once you get my attorneys letter I'm sure you will understand that Fremont Toyota did not do any fraud!!!

**Editor's note:** We'd like to thank Mark Hashimi for the permission to post "whatever you want". We'll be pleased to cite this statement in the future.

Thank you and please don't email me unless your attorney sends me a letter or email.  
Mark Hashimi

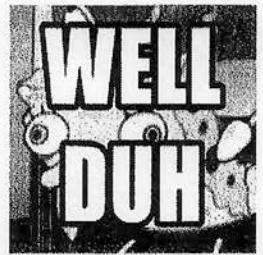
July 02, 2021: Martin to Hashimi

Date: Friday, July 02, 2021 05:34pm PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Loan Fraud



Mark, thanks for writing.

1. Um, yes, Hugo Alcantar physically stealing the papers and creating forged copies would be loan fraud. Most people would see this as obvious. You said before that you didn't understand. If you have a rudimentary grasp of events after all, that's positive.
2. Regarding "proof it", you meant to spell that "prove it". One part of the proof is Hugo's email to me. Once again, Mark, what was the attachment even supposed to be?



I might add that you can read Hugo's acknowledgment of the email online on fremont toyota dot org.

To use a technical term, your decision to support the possibly prosecutable crimes that Hugo has committed means, legally, that you're "hosed".

Google "RICO law" and "conspiracy charges". Are you able to follow that this may be a criminal matter involving 20 years in prison and not simply a civil matter?

(continued on next page)

3. You didn't read my letter closely. I have the option of communicating with third parties, including associates of yours who may not be delighted about the possibility of facing criminal charges on your behalf. I'll proceed to do so.

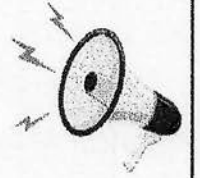
Threats which characterize communications with you or with others as "harassment" will be treated as threats to commit abuse of process. Abuse of process is potentially a prosecutable crime as well as a tort. So is conspiracy to commit perjury.

Mark, a threat to commit a crime can be treated as a crime. How deep a legal hole would you like to dig for yourself?

4. Regarding "posting": Our correspondence will be distributed directly to third parties as well as posted online. So will other events, facts, or information that may be come to light. Demands for confidentiality are not valid and will not be honored.

By the way, settlement most likely will not include NDA, confidentiality clauses, anti-disparagement clauses, or the like. It'll all be in Google for the long term. So, it'll work out best for you if you don't dig that hole too deep.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com



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**July 02, 2021: Martin to Hashimi**

Date: Friday, July 02, 2021 05:25pm PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: PDF of loan papers



Mr. Hashimi, good day. You confirmed receipt of an email sent on June 17 but not receipt of the PDF with my loan papers that you had requested. So, I'm resending the papers.

Please confirm receipt of the attached file or it may be necessary to have a hardcopy delivered to you at your residence or other locations and to take steps to document the delivery.

The attached PDF contains scans of 20 pages of paperwork related to the Fremont-Toyota transaction under discussion, plus a cover page, for a total of 21 pages. These are not scans of the original pages because Hugo Alcantar of Fremont-Toyota physically took original pages out of my hands on December 29, 2021 and stole them. In fact, the copies that were scanned to produce the PDF appear to be color photocopies that have been altered by Mr. Alcantar or other parties at Fremont-Toyota for the purposes of fraud. They are not originals with my original signature or signatures. Only Mr. Alcantar and/or his associates know where the originals are.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com

(continued on next page)



**July 06, 2021: Hashimi to Martin**

**Editor's note:** On the morning of July 06, 2021, I noticed that a law firm named Berliner-Cohen was reviewing the sites. There wasn't much doubt that it was them because the firm owned the network.

I wrote to two of the leads and commented politely. About 2 hours later, Mark sent the letter below to Brian. It appears that the law firm may have told Mark to truck off.

Date: Tuesday, July 06, 2021, 01:56pm PT  
From: Mark Hashimi <markhashimi@fremonttoyota.com>  
To: Brian Martin <brian@fremonttoyota.org>  
Subject: RE: Loan Fraud



Hi Brian,

As you know we have been going back and forth and now my attorneys are involved, at the end of the day you are my customer and I want to make sure you are happy with your purchase!! What is it that I can do to help and move forward? Please advise, I want to keep your business with our company moving forward, so please let me know what I need to do to help resolve any issue.

Mark

---

**July 06, 2021: Martin to Hashimi**

**Editor's note:** LOL.

Date: Tuesday, July 06, 2021 06:47pm PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Loan Fraud Resolution



Mark, thanks for writing.

One suggested correction: You said, "my attorneys are involved". However, they expressed a lack of enthusiasm or they'd have instructed you not to write further, correct? So, you might be without your first choice for representation and most firms other than the bottom of the barrel barratry types will be dubious as well. BTW Was the firm in question Berliner-Cohen?

You asked me to comment on a possible resolution. I'll do so in the short term but probably not this week.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
www.BMartinInvestigations.com

(continued on next page)

**July 08, 2021: Hashimi to Martin**

Date: Thursday, July 08, 2021, 03:04pm PT  
From: Mark Hashimi <markhashimi@fremonttoyota.com>  
To: Brian Martin <brian@fremonttoyota.org>  
Subject: RE: Loan Fraud Resolution



Hi Brian, ok let me know what we can do to resolve any issues.

Mark

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**July 14, 2021: Martin to Hashimi**

Date: Wednesday, July 14, 2021 11:10am PT  
From: Brian Martin <brian@fremonttoyota.org>  
To: Mark Hashimi <markhashimi@fremonttoyota.com>  
Subject: Loan Fraud



Mark, good day.

1. As a first step, the loan parameters under discussion need to be corrected. Additionally, all costs incurred on this side need to be addressed.

2. I'll comment briefly here on the impact of the actions of Fremont-Toyota on this side. This is for the benefit of others who may read this letter. It's not realistic to assume that you personally will react with more than a shrug.

I have two businesses. I'm a private investigator and I also have a company that designs and installs video surveillance systems. Both businesses were impacted by the pandemic.

My wife lost her job at the beginning of the pandemic and it never came back. She was self-employed and collected no unemployment benefits. I'm self-employed as well and collected no unemployment benefits either.

So, money was tight. Then we needed to replace our old Toyota Tacoma. This was as we approached Christmas 2020 when work and funds were even more limited than usual.

To save money for a down payment, I worked a third job at night for Reel Sound and Communications. It was difficult to work both days and nights and not be able to see my family.

We bought a new truck from Fremont-Toyota in good faith. But your people – at least two people and most likely four of you counting you personally – stole thousands of dollars from me and my family. It appears that you may have done this to others before.

It isn't just a civil tort. It's a prosecutable crime, "Mark". Or Kamal Sayed. If it qualifies as a RICO case, you might be looking at 20 years in prison. Even if RICO doesn't apply, prison is a possibility.

3. The loan amount needs to be corrected. The amount that we agreed to is \$28,995.00.

4. I paid taxes related to the extra \$6,000.00 and have paid and am continuing to pay extra interest on that amount. Add both issues to the list that Fremont-Toyota is going to address.

5. Let's not overlook auto registration. I'm stuck paying registration fees for a truck that cost 33,991.00 as opposed to the 28,995.00 that it was supposed to cost. How much is the extra in registration fees going to total over the lifetime of the truck?

I owned my last Toyota Tacoma for 21 years. I expect to receive at least 15 years worth of the difference.

6. Fremont-Toyota ignored initial inquiries on this matter.

This isn't surprising as it's a prosecutable crime that management is involved in. However, the time and effort needed to get to the current point will need to be addressed in dollar terms. The time and effort have been significant.

7. No compensation that we receive in connection with the prosecutable crime that Fremont-Toyota has committed is going to be positioned in any way, shape, or form as taxable income. Nor will any dodgy or grey-area arrangement be acceptable.

As part of this point, a tax person and/or an attorney may be asked to vet any arrangement. You'll cover the costs of such advice.

8. These are the initial points that you need to get started on. It isn't a complete statement and nothing is waived by omission.

9. Closing note:

"Mark", I'm not under representation yet nor have I filed a police report yet. This said, it's advised that you and the others involved consider the matter carefully before you test the waters again to see what type of games you might be able to get away with.

Thank you,  
Brian Martin  
Martin & Associates Investigations  
[www.BMartinInvestigations.com](http://www.BMartinInvestigations.com)

(end of document)

# EXHIBIT C



**From:** Brian Martin [<mailto:bmartininvestigations@yahoo.com>]

**Sent:** Sunday, July 25, 2021 2:36 PM

**To:** Mark Hashimi; Hugo Alcantar; [anna.vierra@gmail.com](mailto:anna.vierra@gmail.com); [rachelghiringhelli@gmail.com](mailto:rachelghiringhelli@gmail.com); [johnalocozy@fremonttoyota.com](mailto:johnalocozy@fremonttoyota.com); [abbyshokoor@yahoo.com](mailto:abbyshokoor@yahoo.com)

**Subject:** Loan fraud

Thank you,

Brian Martin

**Error! Filename not specified.**

**Martin & Associates Investigations**

P.I. Lic. #21866

(925) 570-5033

420 Beatrice Court, Suite G3

Brentwood, CA 94513

[www.BMartinInvestigations.com](http://www.BMartinInvestigations.com)

**Error! Filename not specified.**

Hi Mark,

I have attached a PDF in response to your latest Email. Please confirm receipt.**Error!**

**Filename not specified.Error! Filename not specified.**

**Error! Filename not specified.**

**Error! Filename not specified.Error! Filename not specified.**

**Date:** July 25, 2021  
**To:** Fremont-Toyota Owners and Management  
**Subject:** Next steps

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## **01. Introduction.**

I'm talking to "Mark" Hashimi – aka Kamal Sayed Hashimi – primarily because he responded first. It seems likely that one or both of the 2 women had an obligation to respond as well. We'll come back to that point if necessary.

I don't mind exchanging letters with "Mark", but he may wish to seek assistance from somebody who's able to explain things to him.

Berliner-Cohen is unlikely to represent Fremont-Toyota in this matter. The firm is aware that the dealership has committed at least 2 felonies, that at least 4 people are involved, that the D.A. might take a look, and that a misstep might lead to embarrassment.

However, the firm might be willing to explain things to Fremont-Toyota on an hourly-rate basis. If this isn't the case, perhaps a CPA or other professional could be brought in.

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## **02. Context.**

Before we proceed, let's clarify what we're discussing.

On July 16, 2021, "Mark" Hashimi sent a letter to me which implied that I'd agreed to accept a specific "amount" (he used that word) to be specified up front as full settlement related to the forgery and loan fraud that Fremont-Toyota had committed.

In fact, though, I hadn't agreed to discuss or establish a full settlement prior to correction of the forged loan in exchange for an "amount". The point is that a full settlement isn't going to be a precondition for addressing the forgery.

"Mark" now seems to understand this and to be inquiring regarding how the forgery should be addressed. We'll discuss the options that we see in part 04 below. Remarks related to the options are welcome as long as 3 points are understood:

**02.01.** The unambiguous and highly prosecutable forgery that has been committed needs to be addressed and corrected promptly.

**02.02.** Full settlement is a possibility. In fact, part 7 below discusses full settlement. However, it isn't going to be a precondition to moving forward. The forgery needs to be corrected promptly with or without full settlement. We can go either route.

**02.03.** Dodgy or grey-area maneuvers or attempts to con or manipulate will result in legitimate and reasonable consequences for the individuals involved as well as for the dealership, consequences that are consistent with U.S. laws.

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## **03. Felonies in California.**

Fremont-Toyota management and others involved should bear in mind that Fremont-Toyota employees and/or associates have committed at least 2 felonies. Not just civil torts.

In California, forgery related to amounts over \$950 USD is a felony. Conspiracy to commit forgery seems to be a felony as well.

At least 4 people are involved: “Mark Hashimi”, “Abby” Shokoor, Hugo Alcantar, and a man who identified himself as “Omar”. So, the conspiracy part of a potential criminal prosecution is pretty much a lock.

Note: We haven't looked into “Omar's” identity or background yet, but it's on the to-do list. We'll get around to it when time permits.

Additionally, it appears that Fremont-Toyota may have committed forgery in the past. The D.A. does take patterns of behavior into account.

This isn't a situation where “Hank Torian's” heirs can throw a few dollars at attorneys, clink the wine glasses and reach for the brie, and felonies go away.

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#### **04. Options short of full settlement.**

We presently see 3 ways, short of full settlement, to address the forgery and tangible damages. Note: Full settlement may render this part of the discussion moot.

The 3 options haven't been reviewed formally yet by the lender or by Toyota National, though the lender has commented briefly on one of them. The lender would need to sign off on any changes at its level.

I'd need to receive confirmation from a tax person and/or an attorney that the approach selected was workable. Fremont-Toyota would need to cover the cost of that review. In advance, please note, or by arrangement with the people in question.

Comments are welcome subject to the caution offered in part 02 above.

##### **04.01. Replace old loan with new loan.**

Fremont-Toyota could pay off the forged loan. A new loan for the correct amount could then be written.

There would be additional changes as discussed in the following sections. For example, I expect my wife Janis Martin to be on the papers. The interest rate needs to be lower; note that I've already paid off a large chunk of the correct balance for the loan.

Tangible damages are to be deducted from the balance. One example would be the upfront difference in auto registration fees plus the annual difference over the expected lifetime of the truck. That part alone will probably work out to about \$650 though the total needs to be confirmed.

Fremont-Toyota would be responsible for all charges, expenses, fees, and/or prepayment penalties related to this option.

The forger Hugo Alcantar and the other parties at Fremont-Toyota who have committed felonies should not, of course, be involved with the new loan beyond the minimum steps required.

##### **04.02. Modify existing loan.**

If it's possible to modify the existing loan so as to accomplish a net effect similar to that of 04.01, this option could be discussed. However, this approach seems unnecessarily complicated compared to 04.01. I'm not enthusiastic about it.

The lender has commented and is also doubtful about this option.

**04.03. Write a check.**

Or the forged loan could remain as it is and Fremont-Toyota could write a check to achieve a similar net effect. I'm not enthusiastic about this option either.

This approach, 04.03, would involve extra costs to the dealership. For example, the difference in future interest would need to be added. The review by a tax professional might cost more as well in this case.

The dealership would need to sign a document stating exactly what the check was for.

It should be noted that that document could be used in future prosecutions of Fremont-Toyota employees and/or associates if any party made false statements to the IRS and/or to the California Tax Franchise Board related to the check and/or its purpose.

This option doesn't provide for adding my wife to the papers as discussed in part 05 below. I'm inclined to rule it out on that basis in addition to other concerns.

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**05. Adding my wife Janis to the papers.**

Janis and I believe that Fremont-Toyota lied in multiple respects during the sale process in December. It's a reasonable statement taking into account that a minimum of 4 people at the dealership engaged in a criminal conspiracy.

One issue is that the dealership most likely lied about whether or not Janis could be on the papers.

Fremont-Toyota employees implied that they'd done a credit check on Janis and that her score was too low to permit her to be involved. In fact, they said that her score was "at least 100 points lower" than mine but we think that they just made this up.

I'll add that Janis qualified for a credit card not long after the meeting with Fremont-Toyota and her credit score is just 15 points lower than mine as of this writing.

The idea was that Janis was supposedly too risky from a credit perspective to be on the papers. Our response is that the lender might consider 2 felonies committed by Fremont-Toyota to be more of a risk. Or is the point unreasonable?

We don't presently believe that a credit check on Janis was done at all. Either way, we expect her to be on the corrected papers.

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**06. Interest rate.**



The forged loan has an interest rate of 12.45%. It seems likely that the rate is as fraudulent as the rest of it. The rate is too high, regardless, taking into account the fact that I'll have paid off, up front, a significant percentage of the corrected loan balance.

Under the circumstances, 12.45% is unacceptable. The interest rate is to be revised to 8% retroactive to the date of the sale.

I'll add that Fremont-Toyota told Janis and me, we could refinance to get a lower interest rate after 9 months. I doubt that it was the complete truth.

For other Toyota fans who will see this in Google, really, I'd need to rate Fremont-Toyota as less than 5 stars for honesty.

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## **07. Full settlement.**

Additional compensation needs to be discussed. This will be related to, as one example, the time and effort that the 2 felonies committed by Fremont-Toyota have cost on this side.

I've declined to allow Fremont-Toyota to make full settlement a precondition to correcting the loan that the dealership forged. I also am not inclined to formally offer or agree to a full settlement without formal advice from an attorney.

This said, discussion isn't ruled out.

An attorney has commented on an informal basis that damages for this case would start at a level that happens to be close to the sale price for the Toyota Tacoma in question. Repeat, start. Note: The correct sale price, not the forged one.

Factor in the large percentage of the corrected balance that I've already paid. It might make sense for Fremont-Toyota to pay off the existing loan and simply sign the truck over to Janis and me.

This approach could end up saving the dealership thousands of dollars and the paperwork might be a great deal simpler. This isn't a formal offer to settle in exchange for the loan balance, but the option is one that I'm willing to consider.

Here's what we presently offer in return:

**07.01.** There will be no confidentiality, no non-disparagement, no NDA, no takedown of Web pages, no surrender of Internet domains, and no agreement that limits communication related to the current matter in any way, shape, or form.

**07.02.** Cases that have been opened with the lender and with Fremont-Toyota won't be dropped. However, the case managers will be apprised of developments, including the dealership's compliance with any agreement that is reached.

**07.03.** We won't agree not to seek criminal charges. In fact, if we learn that Fremont-Toyota is continuing to engage in forgery and fraud, it's quite possible that we'll turn our attention to this venue. Regarding how we'd know that Fremont-Toyota is engaging in forgery and fraud, see part 08.03 below. We expect to hear from other fraud victims.

We feel that, under the circumstances, this is sufficiently generous. We trust that Fremont-Toyota doesn't contest the point.

**08. Moving forward.**

**08.01.** Communication with and about other Fremont-Toyota employees and/or associates is planned and should be expected.

This will, of course, include communication with and about the owner or owners once the issue of who that is supposed to be, subsequent to “Hank Torian’s” death, is settled.

**08.02.** Research for legitimate and reasonable purposes related to each person who may be involved in the felonies is likely. The list includes, but is not limited to:

“Abby” Shokoor	Anna Vierra	Hugo Alcantar
“John” Alocozy	Rachel Ghiringhelli	“Omar”, surname to be determined

Such research may include communication with third parties such as business or personal associates who may be able to comment on the felonies that have been committed.

**08.03.** The Fremont-Toyota Loan Fraud websites are #1 to #5 for short-tail searches already in most of the major search engines. We expect to build on that. Go ahead, by the way, type the following four words into Duck-Duck-Go:

**fremont-toyota loan fraud**

If you'd like to try the same search in Google, double-quote the words "load fraud" as follows:

**fremont-toyota "loan fraud"**

The double quotes tell Google to actually include the words "loan fraud" in the search.

Depending on who does the search and where they're located, we've got the top 4 results in Google for that search. Top 4 in Google isn't bad. We can probably do the same for Fremont-Toyota combined with the names Mark Hashimi, Anna Vierra, etc.

(end of document)

# EXHIBIT D

**From:** Brian Martin [<mailto:bmartininvestigations@yahoo.com>]

**Sent:** Wednesday, September 01, 2021 11:15 AM

**To:** [abbyshokoor@yahoo.com](mailto:abbyshokoor@yahoo.com); [ahmed.s.azzam@gmail.com](mailto:ahmed.s.azzam@gmail.com); [azzam@hybrid-records.com](mailto:azzam@hybrid-records.com); [johnalocozy@fremonttoyota.com](mailto:johnalocozy@fremonttoyota.com); [khashimi@aol.com](mailto:khashimi@aol.com); [kamalhashimi@charter.net](mailto:kamalhashimi@charter.net); [markhashimi@gmail.com](mailto:markhashimi@gmail.com); [markhashimi@fremonttoyota.com](mailto:markhashimi@fremonttoyota.com); [tashatorian@yahoo.com](mailto:tashatorian@yahoo.com); [rachelghiringhelli@gmail.com](mailto:rachelghiringhelli@gmail.com); [c.hidalgo@californiasuperstores.com](mailto:c.hidalgo@californiasuperstores.com); [chidalgo@folsomdodge.com](mailto:chidalgo@folsomdodge.com); [ahmed@metrius.com](mailto:ahmed@metrius.com); [brucekavich@yahoo.com](mailto:brucekavich@yahoo.com); [dkavich@yahoo.com](mailto:dkavich@yahoo.com); [halcantar@msn.com](mailto:halcantar@msn.com); [tasha.khachaturian@bellsouth.net](mailto:tasha.khachaturian@bellsouth.net); [c\\_hidalgo20@hotmail.com](mailto:c_hidalgo20@hotmail.com)

**Cc:** [brian@fremonttoyota.org](mailto:brian@fremonttoyota.org)

**Subject:** Fremont Toyota Loan fraud

Mark, Good day. Please see attached PDF.

Thank you,

Brian Martin

**Error! Filename not specified.**

**Martin & Associates Investigations**

P.I. Lic. #21866

(925) 570-5033

420 Beatrice Court, Suite G3

Brentwood, CA 94513

[www.BMartinInvestigations.com](http://www.BMartinInvestigations.com)

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**Subject: Khachaturian Foundation**

**1. Introduction.**

You should have received 6 numbered pages, not counting any cover letter. If you didn't receive 6 numbered pages, your copy of this document is incomplete.

First, addressing ANCA Western Region and Asbarez, the rest of this letter isn't direct communication to your groups, but it'll serve as an introduction. Discussion of the life and work of Henry Khachaturian aka "Hank Torian" is requested. Letters should be emailed to the following email addresses:

Story editor and website host: [me@fremonttoyota.org](mailto:me@fremonttoyota.org) P.I. in the story: [brian@fremonttoyota.org](mailto:brian@fremonttoyota.org)

No responses from the Khachaturian heirs are needed at this time. Documents that request responses will be delivered by registered snail-mail and/or in person in due course.

This said, readers should feel free to submit corrections related to this or other documents.

The Khachaturian Foundation is a grey-area enterprise that funnels stolen funds to charities and, it appears, to the Armenian Apostolic Church.

It's a colorful and interesting story, but it's important that the facts which are posted be accurate if the story is to benefit society. This is especially true as parts of the story are already on page 1 for Google search results. So, feedback is welcome.

Technical note: Grey-area means that the terms "criminal enterprise" and "RICO" may or may not apply but the Khachaturian Foundation is funded in part regardless by felonies that those in charge support without signs of hesitation.

It's difficult to say what "Hank Torian" would think. Honda National alleged that "Hank" had bribed Honda executives, but "Hank" disputed the charges. Was Mr. Khachaturian an honest businessman who'd be appalled at the felonies committed by his subordinates? Or were felonies something that he was happy with and even planned? Or was the truth, as it often is, somewhere in the middle?

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**2. Three new domains.**

As a related note, the following three new domains have been registered:

<https://KForCharity.org/> – Future Khachaturian Foundation site  
<https://DaphneKavich.com/> – Future Khachaturian heir site  
<https://NatashaAzzam.com/> – Future Khachaturian heir site

For the moment, the links go to the main Fremont-Toyota Loan Fraud site. However, we expect to set up separate pages for each subject in due course as we did for Mark Hashimi:

<https://MarkHashimi.org/> – Kamal Sayed Hashimi site

The "kforcharity" domain will be used to explore the connections of the Khachaturian Foundation to felonies that have been committed and/or to discuss the connections with groups such as charities and Churches that the Foundation is associated with.

### **3. Google results.**

For those new to the story of the Fremont-Toyota felonies, feel free to visit:

fremonttoyota dot org  
markhashimi dot org

Or type Fremont-Toyota Forgery into Google or Duck-Duck-Go and scroll down a bit. You should find the story on the 1st page. Maybe the 2nd page for Google.

If that search doesn't work, type the name Mark Hashimi into Bing, Duck-Duck-Go, or Google. #1 hit for 2 out of the 3 sites. Imagine that.

Similar results will be achieved in the future for other names such as Khachaturian Foundation, Daphne Kavich, Natasha Azzam, Anna Vierra, and Rachel Ghiringhelli.

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### **4. Domain registrant.**

The domains listed above are registered to a third party. The websites are hosted by the party in question. Questions or comments related to the use of the domains should be directed to the domain registrant and host. For more information, see the Site Notices on the existing sites.

It should be noted that the domain registrant and host may post, blog, distribute, or otherwise make use of any correspondence that is received. The short version is that it'll go into Google.

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### **5. Wrapping up with "Mark" Hashimi.**

Kamal Sayed Hashimi, good day.

Thank you for confirming your role in the current matter; i.e., accessory after the fact to two felonies. The statement related to Hugo Alcantar's email is all that is presently needed from you.

To be honest, it's surprising that you answered as you did. It appears that you didn't talk to an attorney before writing the letter. Not one with your interests at heart, at any rate.

"Mark", you've bet the farm – and possibly the future of the Khachaturian Foundation – on your estimate of the odds related to two of the situations that you and the Khachaturians face; i.e., civil litigation and criminal prosecution.

What you've overlooked is that there are multiple parallel paths forward. Each of which is consistent with U.S. laws, some of which are both simple and potentially humorous, and not one of which can be foreclosed by abuse of process.

By the way, if the Khachaturians are inclined to try for abuse of process, it's inadvisable. I don't know much about prosecutions of attorneys for battery – it's a crime in California, I know that much – or disbarment proceedings, but I'm open to learning new things.

In closing to "Mark", thank you for your time. You may be updated in connection with future developments. In the short term, though, you've served your purpose.

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## **6. Moving forward.**

There are gaps to be filled in related to Daphne (Khachaturian) Kavich, Natasha (Khachaturian) Azzam, the “Hank Torian” estate, and the Khachaturian Foundation. Where the Armenian Apostolic Church fits into all of this needs to be reviewed as well.

The legal and/or putative roles of Ms. Ghiringhelli and Ms. Vierra are also of interest. The lower-level parties who were involved in the felonies also need to be looked at.

It'll be helpful if assets, roles, street addresses, and other data related to the Khachaturian Foundation and heirs can be confirmed.

The information will be used, to be clear, for legitimate and reasonable purposes that are consistent with and/or protected by U.S. laws.

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## **7. Connections between Foundation and dealerships.**

A reasonable person would agree with the assessment that the Khachaturian Foundation is funded in part by the proceeds of prosecutable crimes.

It'll be difficult, regardless, for the Khachaturians to take the position that there is a wide separation between the dealerships and the Foundation. The two levels are flip sides of the same coin and a review of the Foundation's role is called for.

It appears that both of the husbands of the Khachaturian sisters may be employed as General Managers at Khachaturian dealerships. Natasha is past and/or present President of the Foundation and agent for the purpose of process service.

Both sisters seem to have been Board Members or had similar roles at LLCs associated with the dealerships. Additionally, both sisters and at least one of the husbands seem to be on the Foundation's Executive Committee. There are a number of other connections.

## **8. Request for confirmation.**

Some of the data assembled so far is listed below. No representation is made to the effect that the data is correct. If any party who reads this letter is able to confirm or contradict any of the data, this will be appreciated.

### **8.1. Khachaturians.**

Daphne (Khachaturian) Kavich  
1327 Parrot Drive  
San Mateo, CA 94402  
Market value of property: \$2.8M

DOB: 12-1958  
Possible email: dkavich@yahoo.com

Husband: Bruce Jeffrey Kavich  
Husband DOB: 12-1958  
Job: General Manager, Acura of Fremont  
Possible email: brucekavich@yahoo.com

Natasha (Khachaturian) Azzam  
50 Sugar Hill Drive  
Hillsborough, CA 94010  
Market value of property: \$4.2M

DOB: 11-1972  
Possible email: tasha.khachaturian@bellsouth.net  
Possible email: tashatorian@yahoo.com

Natasha seems to have had one drunk-driving arrest two decades ago but her criminal record seems to be clear subsequently.

Husband: Ahmed Salem Azzam  
Husband DOB: 02-1971  
Job: General Manager, Lexus of Concord

Possible email: ahmed.s.azzam@gmail.com  
Possible email: azzam@hybrid-records.com  
Possible email: ahmed@metrius.com

## **8.2. Khachaturian Foundation and other businesses.**

\* The Khachaturian Foundation's EIN (analogous to the SSN for an individual) is 943337684.

\* The Khachaturian Foundation isn't connected, presumably, to the Aram Khachaturian Foundation. If there is, however, a connection between the Fremont-Toyota Felony Khachaturians and the noted composer Aram Khachaturian, the fact will be of interest.

\* The Foundation's list of Funding Interests explicitly includes "Christian Organizations and Churches". Additionally, the Foundation seems to have ties to the Armenian Apostolic Church.

The position of the Armenian Apostolic Church on felony crimes is one of the points that needs to be established.

\* Other Funding Interests include "Armenian Culture". This most likely includes promotion of historical recognition of the Armenian Genocide.

Such causes are important but the Khachaturians should be ashamed of their connection to actual felonies even if it's to promote the social good.

There is some irony, too, in that historical recognition of the Armenian Genocide is about the point that facts are real, that what happens does matter, and that willful denial of facts, great or small, is the force that makes crime as well as all of the horrors of history possible.

\* The Foundation is, or has been, plump to the point of bursting with cash. Partly stolen cash, as it happens. A 2018 Form 990 shows assets of \$31M to \$33M and annual income of \$7M.

It looks like the Foundation is, or has been, in the top 5% of both California and U.S. Foundations by Assets. This needs to be confirmed but there's little doubt that we're talking about one of the larger Foundations. Funded by felonies.

It seems possible that the story will prove to be newsworthy.

\* "Hank Torian" had or was involved in numerous business ventures over the decades. Examples included the Foundation, Concord Auto Dealership, Fremont Auto Dealership, Stevens Creek Auto Dealership, and something



called “Auto Legend”.

\* Several of “Hank’s” ventures were named after his daughter Natasha; for example, Tasha Automotive Group, The Tasha Corporation, Tasha Imports, and Tasha Air.

This may have been due to the fact that the contraction “Tasha” is euphonious as opposed to “Hank” favoring Natasha over Daphne.

Or perhaps Daphne was simply less interested in serving the same role that Melinda “Wendy” Thomas did for her father Dave Thomas when the “Wendys” hamburger chain was named. The Khachaturian sisters are free to comment.

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### 8.3. Snail-mail list under construction.

Khachaturian Foundation  
360 Post St. STE 401  
San Francisco, CA 94108

Daphne Kavich  
1327 Parrot Drive  
San Mateo, CA 94402

Natasha Azzam  
50 Sugar Hill Drive  
Hillsborough, CA 94010

Hugo Alcantar  
808 El Vecino Ave Apt A  
Modesto, CA 95350

John Alocozy aka Abdul Alocozy  
7707 Hillview Court  
Tracy, CA 95304

Rachel Ghiringhelli  
29050 Windemere Road  
Hayward, CA 94544

Kamal Sayed Hashimi  
c/o Katherine P. Campos  
3018 Chickpea Court  
Antioch, CA 94509

Kamal Sayed Hashimi  
c/o Jamal Hashimi Sr.  
36629 Cabrillo Drive  
Fremont, CA 94536

Carlos Hidalgo  
333 Bush St. APT 4103  
San Francisco, CA 94104

Anna M. Vierra  
2549 Dos Rios Drive #602  
San Ramon, CA 94583

Nora Hovespian or Armen Sahakyan  
ANCA Western Region Board  
104 N. Belmont St. Suite 200  
Glendale, CA 91206

Ara Khachatourian, Editor  
Asbarez Newspaper  
1203 N. Vermont Ave  
Little Armenia, CA 90029

---

### 8.4. Email list under construction.

Abby Shokoor <abbyshokoor@yahoo.com>

John Alocozy <johnalocozy@fremonttoyota.com>

Ahmed Azzam <ahmed.s.azzam@gmail.com>

Kamal Hashimi <khashimi@aol.com>

Ahmed Azzam <azzam@hybrid-records.com>

Kamal Hashimi <kamalhashimi@charter.net>

Ahmed Azzam <ahmed@metrius.com>

Kamal Hashimi <markhashimi@gmail.com>

Bruce Kavich <brucekavich@yahoo.com>

Mark Hashimi <markhashimi@fremonttoyota.com>

Daphne Kavich <dkavich@yahoo.com>

Natasha Azzam <tashatorian@yahoo.com>

Hugo Alcantar <halcantar@msn.com>

Rachel Ghiringhelli <rachelghiringhelli@gmail.com>

Natasha <tasha.khachaturian@bellsouth.net>

C. Hidalgo <c.hidalgo@californiasuperstores.com>

Carlos Hidalgo <c\_hidalgo20@hotmail.com>

Carlos Hidalgo <chidalgo@folsomdodge.com>

Anna Vierra <anna.vierra@gmail.com>

Ara Khachatourian <web@asbarez.com>

**8.5. Closing notes.**

\* Corrections to the snail-mail and email entries are requested.

\* Carlos Hidalgo is or has been a member of the Khachaturian Foundation Executive Committee and is relevant in that context.

\* Robert “Mitch” Drangle is another such member but his business, Aldran Chemical, seems to have shut down and other contact information for him has not been found.

\* The parties Samantha, Charlie, Henry, and Jasmin mentioned in one obituary are confirmed to be Henry Khachaturian’s grandchildren. The younger Henry was presumably named after his grandfather.

(end of document)

# EXHIBIT E

From: **Robert Kiraly** <oldcoder@zoho.com>  
Date: Wed, Dec 8, 2021 at 3:05 PM  
Subject: Re-sending: For Raffi Hashemi  
To: Raffi Hashemi <krayzkid@yahoo.com>, Raffi Hashemi <zarlasht15@gmail.com>  
Cc: Mark Hashimi <markhashimi@gmail.com>, John Alocozy <johnalocozy@fremonttoyota.com>, Scott Stengel <Scott.Stengel@ally.com>, Mark Hashimi <markhashimi@fremonttoyota.com>, Rachel Ghiringhelli <rreboton@bellsouth.net>, John Alocozy <alocozyj@sbcglobal.net>, Jeanne Roth <jeanne.roth@ally.com>, Richard Kent <richard.kent@ally.com>, Jeffrey Brown <jeffrey.brown@gmaccfs.com>, Jeffrey Brown <jeffrey.brown@gm.com>, Maureen Breakiron-Evans <maureen.breakironevans@cigna.com>, Natasha Khachaturian <tasha.khachaturian@bellsouth.net>, Natasha Khachaturian <tashatorian@yahoo.com>, Natasha Khachaturian <tashk@sbcglobal.net>, Natasha Khachaturian <ahmed.s.azzam@gmail.com>, Daphne Kavich <asalem@alexan.com>, Matthew Rost <mrost@fremonttoyota.com>, Rachel Ghiringhelli <turquoise202@gmail.com>, Rachel Ghiringhelli <boarders94536@yahoo.com>, Rita Khachaturian <hkhachaturian1@yahoo.com>, Julie Sanchez <juliesanchez@lexusofconcord.com>, Eric Da Silva <ericdasilva@lexusofconcord.com>, Basir Kahn <basirkahn@lexusofconcord.com>, Ryan Arter <social@lexusofconcord.com>, Ben Gullo <bengullo@lexusofconcord.com>

This is a modified resend from a different IP address and email account. It's being re-sent due to technical issues. FWIW I rotate email addresses and/or IP addresses as necessary. I also don't mind filing counter-complaints or initiating civil litigation where appropriate. Anyway, please excuse a duplicate or semi-duplicate copy if you received one.

Farida Ismail, Nadia Aslami, and Nagina and Abdul Hamidi [actually, either of the two Abdul Hamidis]: Are you able to forward this letter to Raffi Hashemi? If not, never mind.

As a separate issue, if you do know Raffi, may I ask, what is the connection between the names "Hamidi" and "Hashemi" ?

And what is Raffi's connection to Shabnam Habibzada? There is some indication that they're either the same person or closely connected. Probably the latter.

Raffi Hashemi, good day. This letter is for you. The request to other parties is to forward or to provide additional contact information.

I'm transcribing and/or translating Sam Pawar's statement related to Fremont-Toyota, which is of course connected to Lexus of Concord. It's detailed and some translation from the Hindi is needed as well. So, I figure that it'll take the rest of December to finish the first draft.



People who are unfamiliar with the new Sam Pawar page will be able to find it from the Fremont-Toyota auto loan fraud site. Just type some of those words into Bing or Duck Duck Go.

Raffi Hashemi: I've just gotten to one of the anecdotes related to you personally. In all seriousness, you're quite the smug Jihadi, aren't you? I'm writing for the legitimate and reasonable purpose, a purpose consistent with U.S. laws, to invite you to double-check that part of Mr. Pawar's statement and to offer corrections.

It's online but Sam has just now sent more details. It'll probably take me a few hours to get around to editing them. Press Reload or clear your browser cache later.

As a note to attorneys, any attempt to assert that the preceding is any way, shape, or form, "harassment", will be contested on multiple grounds, including but not limited to the following:

(a) There are reasonable grounds to characterize Raffi Hashemi [or the person using that name] as a Jihadi; in the sense, for example, that he is embedded in a self-identified Muslim organization that employs means which are directed explicitly and specifically at non-Muslims and that are both immoderate and unlawful.

Or would "smelly Indians" and "pray to your Hindu god" and similar ethnic abuse not qualify as sufficiently explicit?

(b) I'm writing for the legitimate and reasonable purpose that is cited further up.

(c) Pretty much everybody on the "Cc" list -- there are only a few exceptions -- is connected directly or indirectly to, or is likely to be in possession of knowledge related to, a Muslim-run organized-crime operation that is arguably RICO-level.

(d) Whether or not a RICO case can be made or even whether or not Mr. Pawar is able to initiate civil litigation, communication with and/or related to the Muslim-run organized crime operation serves the public interest in multiple contexts.

As a separate note, I've talked with the current attorney on Sam's side. He's under assessment. With no offense to him intended, if it doesn't appear that he's going to make full use of the statement that is being assembled, Sam is likely to consider other options.

Remarks are offered casually as I don't presently represent anybody but

myself. To everybody who is personally familiar with the original case, though, I'd like to add, wasn't it stone-cold stupid to pull this sh\*t with a P.I. who's had two TV series made about him?

I'd like to know what the Khachaturians are thinking, but the point is most likely an oxymoron. I'm not greatly impressed so far by anybody on the organized-crime side.

I'll close today with: Seasons Greetings.

There is no explicit or implied commitment in the preceding to refrain from further communications prior to the holiday. We still need to review what Mr. Pawar has to say regarding the rest of the gang of 7 Muslims who are listed on his page.

# EXHIBIT F

**Received:** 05:01 PM PDT, 10/05/2021  
**From:** "Phillips, Kristen" <Kristen.Phillips@Ally.com>  
**To:** Lisa Banks <lisa@fremonttoyota.com>  
**Subject:** RE: \*\*EXTERNAL\*\* BRIAN MARTIN FILE

Lisa I I apologize but we haven't been able to follow up with the customer to discuss our updated findings since we last discussed this account. We have closed out the TOS and will inform the customer that there is not enough evidence to suggest any suspicious activity occurred. If anything else is needed I will follow up with you.

Please let Mark know that if any further steps are needed we will reach out to your team.

Thank you,

**KRISTEN PHILLIPS**

**Sr. Account Executive- Auto** | Pacific West Coast Region

[Kristen.Phillips@ally.com](mailto:Kristen.Phillips@ally.com)

Office 402.350.5609 | Fax 833.944.0584



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**LEAD**



Contract Processing: 855-720-2559 8-5:30pm Fax 877-709-6084 8-8pm  
SmartLease PreCheck: Fax 855-635-0309 or [LeasePrecheck@ally.com](mailto:LeasePrecheck@ally.com)  
Dealer Service Center: 888-919-2559  
Dealer Reserve: 855-689-9434  
SmartCash: 800-675-9387



# EXHIBIT G

From: <me@fremonttoyota.org>

Date: Sat, Jul 3, 2021, 9:51 AM

Subject: Questions about "Mark" aka Sayed Hashimi

To: Katherine Campos <khashimi@comcast.net>

Cc: K. Campos <mmariacampos@yahoo.com>, Katherine Campos <markhashimi@gmail.com>,

K.P. Campos <mariacampose55@gmail.com>, Rachel Ghiringhelli

<rachelghiringhelli@gmail.com>, Hugo Alcantar <hugo.alcantar@uswest.net>, Abby Shokoor

<abbyshokoor@yahoo.com>, Anna Vierra <anna.vierra@gmail.com>, John Alocozy

<alocozyj@sbcglobal.net>, Rachel Ghiringhelli <rreboton@bellsouth.net>

This letter is intended for Katherine P. Campos but other parties are invited to review the new Mark Hashimi site.

Ms. Campos, good day.

I'm a senior citizen and developer; in short, an Old Coder. I'm seeking to put Walter and Cynthia Ruehlig, two leading citizens in Antioch, in prison but you're unlikely to know the two unless you're involved with the Antioch school system.

In the course of researching child kidnapping and sexual abuse cases that the Ruehligs are connected to -- it's a colorful story -- I met a P.I. who's had dealings with Mark Hashimi also known as Kamal Sayed Hashimi.

Kamal (or Sayed) is apparently your ex-husband. Oddly, though, he shows up as associated with the Chickpea Court address as late as 2018, 14 years after you filed for dissolution on July 01, 2004. But that isn't important.

I've offered to act as website editor for the P.I. in this case. To be clear, I'm not a P.I. or an attorney. I'm pretty good at organizing information, though. To paraphrase a favorite song, "Devil Went Down to Georgia", I might be the best there ever was.

Would you be able to review the site Mark Hashimi dot org and offer corrections or more information? Plus do you know where "Mark" is located these days? We'd like to talk to some of his associates about a prosecutable crime that he's committed. We know that he may be in a particular apartment in San Ramon but that is unconfirmed.

The full story is linked on the Mark Hashimi dot org site or you can also go to Fremont Toyota dot org. Or just type the following four words into Google. If you include the double quotes, one of the sites may show up as #1:

fremont toyota loan "fraud"

Technical note: The double quotes tell Google that the word "fraud" must be included.

As a note to the others at Fremont-Toyota, you may wish to look up the term short-tail search because each of you is probably going to be at #1 in Google for the crime in question by mid-2022.

Regards, Robert (the Old Coder)

# EXHIBIT H



From: [me@fremonttoyota.org](mailto:me@fremonttoyota.org) <[me@fremonttoyota.org](mailto:me@fremonttoyota.org)>  
Sent: Tuesday, July 6, 2021 11:44 AM  
To: Cheng, Mike <[Mike.Cheng@berliner.com](mailto:Mike.Cheng@berliner.com)>  
Cc: [markhashimi@gmail.com](mailto:markhashimi@gmail.com); [anna.vierra@gmail.com](mailto:anna.vierra@gmail.com); [alocozyj@sbcglobal.net](mailto:alocozyj@sbcglobal.net)  
Subject: Fremont-Toyota case

[External Email]

Mr. Cheng, good day.

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

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

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

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

Don't even think about trying for DMCA related to the photo of Hashimi.  
He probably no longer possesses sole rights to the photo and there's a ton of Fair Use regardless.  
Regarding use of the possible mark "fremonttoyota" in domain names, Fair Use and/or Nominative Use apply.

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

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

Regards, Robert (the Old Coder)

**WV-100**  
**ATTACHMENT 9(f)**

Petitioner: Fremont Toyota  
Respondent: Robert Kiraly

**Attachment 9(f) to Petition for Workplace Violence Restraining Order (WV-100)**

**9(f)** – Other Personal Conduct Orders: I ask the court to order the respondent **not** to do any of the following things to the employee or to any person to be protected listed in (4):

1. Post any statements about Petitioner and/or employee online, related to employees' personal information, addresses, images, and anything not factually related to purchase of vehicle from Petitioner, including but not limited to personal websites, social media, blogs, yelp, comment boards, and the following websites:
  - fremonttoyota.org
  - annavierra.org
  - kforcharity.org
  - daphnekavich.com
  - natashaazzam.com
  - markhasimi.org
  - odcoder.org
  - boldcoder.org
  - laclin.com
  - dansu.org
  - markhashimi.org
  - abbyshokoor.com
  - annavierra.com
  - hugoalcantar.com
  - johnalocozy.com
  - rachelghiringhelli.com
  - fremonttoyota.news
  - krynet.pw
2. Create any websites using the name and likeness of Petitioner, its employees, and employees' family members.
3. Instruct any others, including but not limited to Brian Martin, to engage in any of the conduct set forth herein against Petitioner and/or employees and their family members.

**WV-100:  
ATTACHMENT 12**



Petitioner: Fremont Toyota  
Respondent: Robert Kiraly

**Attachment 12 to WV-100 Petition for Workplace Violence Restraining Order**

Respondent has made clear to employee that he knows where employee lives, by publishing this information online along with his picture, and directly contacting his wife. Respondent is working together with another individual, Brian Martin, and together they have cyberstalked and defamed employee and falsely (and publicly) accused Petitioner and Employee of running a Muslim-run crime ring, being a Muslim gang, and employing Jihadi. Petitioner fears if Respondent receives notice prior to submission of this TRO, Respondent will retaliate against employer and/or employee (and his family) at his home, or incite violence against employer or employee, as he has stated he will not comply with any order to cease his attack.