

KROGH & DECKER LLP
DEREK C. DECKER (SBN 232243)
derekdecker@kroghdecker.com
TREVOR A. WHITE (SBN 320305)
trevorwhite@kroghdecker.com
555 Capitol Mall, Suite 700
Sacramento, CA 95814
Telephone: (916) 498-9000
Fax: (916) 498-9005

Attorneys for Defendant Vision of Success, Inc.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF CONTRA COSTA**

MONICA ARMSTRONG, an individual,
on behalf of herself and others similarly
situated,

PLAINTIFF,

v.

VISION OF SUCCESS, INC.; and
DOES 1 thru 50, inclusive,

DEFENDANTS.

Case No. MSC21-01992

[Case Assigned for All Purposes to Hon. Danielle
Douglas in Dept. D-18]

**DECLARATION OF BEJAN FARAHBAKHSH
IN SUPPORT OF MOTION FOR APPROVAL
OF REPRESENTATIVE ACTION
SETTLEMENT**

Date: TBD

Time: TBD

Dept.: 18

Complaint Filed: September 13, 2021

Trial Date: None Set

1 I, Bejan Farahbakhsh, declare as follows:

2 1. I make this declaration based on my personal knowledge, except where stated on
3 information and belief. I am over 18 years old and could and would competently testify to the facts
4 stated herein if called as a witness.

5 2. I am the Chief Executive Officer and Chief Financial Officer for Vision of Success,
6 Inc. (“VOS”)

7 3. Although VOS vigorously disputed liability, the main issues driving resolution in
8 this case was VOS’ ability to pay any meaningful settlement or judgment against it.

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

11
12 Dated: 13/11/2024

By:  Bejan Farahbakhsh (Nov 13, 2024 15:11 PST)

13 Bejan Farahbakhsh
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Dec of VOS ISO Mtn for Representative Settlement - VOS 11.6.24[24] copy

Final Audit Report

2024-11-13

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"Dec of VOS ISO Mtn for Representative Settlement - VOS 11.6.24[24] copy" History

-  Document created by Trevor White (trevorwhite@kroghdecker.com)
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On December 19, 2024, I served all interested parties in this action the following documents described as: **DECLARATION OF BEJAN FARAHBAKHSH IN SUPPORT OF MOTION FOR APPROVAL OF REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Derek C. Decker, Esq
Trevor White, Esq.
Gloria Kukuryak
KROGH & DECKER, LLP
555 Capitol Mall, Suite 700
Sacramento, CA 95814
derekdecker@kroghdecker.com
trevorwhite@kroghdecker.com
gloriakukuryak@kroghdecker.com

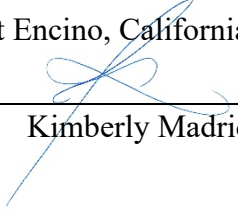
Kane Moon, Esq.
kmoon@moonlawgroup.com
Lilit Ter-Astvatsatryan, Esq.
lilit@moonlawgroup.com
Linh H. Tran, Esq.
ltran@moonlawgroup.com
MOON LAW GROUP, PC
1055 W. Seventh St., Suite 1880

[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] (BY ELECTRONIC MAIL TRANSMISSION): I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 19, 2024, at Encino, California.



Kimberly Madrid