

VIRGINIA:

IN THE CIRCUIT COURT FOR FAUQUIER COUNTY

WAT LAO BUDDHAVONG, INC.,)	
)	
Plaintiff,)	Case No. CL20-122
)	
v.)	
)	
SOUKSOMBOUN SAYASITHSENA, ET AL.)	
)	
Defendants.)	

PLAINTIFF'S ANSWERS TO DEFENDANTS
FIRST SET OF INTERROGATORIES

COMES NOW your Plaintiff, WAT LAO BUDDHAVONG, INC. ("Wat Lao"), through counsel, and makes the following answers to the first set of interrogatories propounded by Defendant Souksomboun Sayasithsena.

INTERROGATORIES

- 1) Set forth the following information with respect to each person who has personal knowledge, information, proof, or evidence as to all or part of the facts described in the Complaint or Defendants' Plea in bar or Demurrer filed in this matter:
 - A. His or her name, address, telephone number, occupation, title and relationship to the parties, if any, and otherwise identify such person;
 - B. The name, address, email address and telephone number of the person's employer;
 - C. The subject matter for which the person may be called to testify if called to testify as a witness by any party; and
 - D. The specific knowledge that you believe this person to possess relevant to this action.

ANSWER:

Name: MDS J. ARRINGTON
Address: Unknown
Phone: Unknown

Occupation: Master Deputy Sheriff of Fauquier County
Title, Relationship to Parties: Local Law Enforcement
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St., Warrenton, VA 20186, 540 422 8748
Subject Matter: Business Interference; Complaints at Temple; No Trespassing notices served on Defendants
Knowledge: Responded to reports of violation of no trespassing orders at the Temple on October 8, 2019; upon information and belief, witnessed two of the defendants handling the converted donations of the Plaintiff.

Name: MDS William D. BAILEY
Address: 78 West Lee St, Warrenton, VA 20186
Phone: (540) 422 8634
Occupation: Master Deputy Sheriff of Fauquier County
Title, Relationship to Parties: Local Law Enforcement
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186, 540 422 8748
Subject Matter: Business Interference; Complaints at Temple; No Trespassing notices served on Defendants
Knowledge: Responded to reports of violation of no trespassing orders at the Temple on October 8, 2019; upon information and belief, witnessed two of the defendants handling the converted donations of the Plaintiff.

Name: Det BOUPHA
Address: 9005 Tyler Court, Manassas, VA 20110
Phone: (202) 999-8184
Occupation: Driver
Title, Relationship to Parties: Frequent volunteer for Wat Lao
Employer Info: Unknown
Subject Matter: Effects of Defendants' tortious conduct on the Temple community and volunteers.
Knowledge: Knows who the true board members are; knows the customary manner in which Buddhist Temples manage donations, financial reporting to the general public, fundraising and plant operations; the effect of Defendants' conduct on the Temple community and volunteers. He stopped volunteering, visiting the temple and attending ceremonies because of Defendant's combative and intimidating conduct.

Name: Sing BOUROMMAVONG
Address: 5512 Joplin Street, Springfield, VA 22151
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: He is listed as a Trustee/Director on a fake "Resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual Report filed on September 6, 2019, as a Trustee/Director.
Employer Info: Unknown
Subject matter: Conspiracy; Business Interference; Conversion; and Identity Fraud; Business Interference; Fraudulent VA SCC filings.

Knowledge: Knowledge that he was listed on the fraudulent SCC documents; knowledge of the subsequent mass publication of the fraudulent documents; intimate knowledge of the Defendants' schemes to defraud the public; knowledge of the details and amounts of the converted donations of the Plaintiff. Knowledge of the custody and control of the converted donations of the Plaintiff.

Name: Southalavong BOUTAH

Address: 6402 Holyoke Drive, Annandale, VA 22003

Phone: (571) 215-4641

Occupation: Emeritus Board Member of Plaintiff

Title, Relationship to Parties:

Employer Info: Retired

Subject Matter: All matters described in the Complaint.

Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the negative effect of Defendants' conduct on the volunteers, Monks and the international Buddhist Community; Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Saimai Saithong "Thong" CHANDOK

Address: Unknown

Phone: Unknown

Occupation: Restaurant Owner

Title, Relationship to Parties: Initial leader cultivating and facilitating conspiracy to defraud and steal from the Plaintiff.

Employer Info: Saithong Para Thai, LLC, 20 Plantation Drive, Fredericksburg, VA 22406, (540) 993-4666

Subject Matter: Conspiracy; Business Interference; Conversion; Identity Fraud;

Knowledge: Know the people who initiated the conspiracy described in the complaint; he has personal knowledge of the actions taken by the Defendants in furtherance of this conspiracy.

Name: Phonesavanh CHANTAKHOUNE

Address: Unknown

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is a fraudulent Secretary appointed by the fraudulent "Board"

Employer Info: Unknown

Subject Matter: Fake officers of Wat Lao

Knowledge: Knows the people who impersonated Wat Lao Officers and conspired to interfere with the peaceful operation of Wat Lao; attended meetings of these people; conspired with them.

Name: Bobby CHANTHAMIXAY

Address: 11460 Morla Lane, Nokesville, VA 20181

Phone: (757) 218-0071

Occupation: Construction Company Owner

Title, Relationship to Parties: Frequent volunteer at the Temple.

Employer Info: AA Group Inc., 11460 Morla Lane, Nokesville, VA 20181

Subject Matter: The negative impact of the Defendants' activities on the Volunteers, Monks and international Buddhist Community.

Knowledge: Knows that Wat Lao is in good standing in the Buddhist community; is familiar with customary ways of running a temple, including the customary procedures for receiving donations.

Name: Khamsao CIVILIZE

Address: Unknown

Phone: (540) 522-3995

Occupation: Contract Specialist

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.

Employer Info: Builder's Floor Service Inc., 7904 Yarnwood Ct, Springfield, VA 22153

Subject Matter: Was actively involved in temple activities and day-to-day events

Knowledge: Knows that Wat Lao is in good standing in the Buddhist community; is familiar with customary ways of running a temple, including the customary procedures for receiving donations.

Name: Sergeant Deputy Sheriff COPPAGE

Address: Unknown

Phone: (540) 347-3300

Occupation: Sergeant Deputy Sheriff

Title, Relationship to Parties: Sergeant Deputy Sheriff

Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186, 540 422 8748

Subject Matter: Complaints at Temple; No-trespassing notices served on Defendants

Knowledge: Responded to reports of violations of no trespass orders on Plaintiff's property.

Name: Daeng SAENGMANY

Address: Dale City, VA

Phone: (571) 241-2646

Occupation: Corning Employee

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.

Employer Info: Corning, Inc., employer address unknown.

Subject Matter: Administrative operations of Plaintiff organization; Effect of Defendants' conduct on volunteers and Monks at Temple and the international Buddhist community.

Knowledge: Was actively involved in the office management and day-to-day functioning of Plaintiff's Temple for approximately five years. Participated in the customary handling of donations at the Temple, including collecting, accounting and depositing.

Name: Achan Thongvone DALAVONG

Address: 6606 Woodyard Road, Upper Marlboro, Maryland 20772

Phone: (301) 599-8780
Occupation: Buddhist Monk
Title, Relationship to Parties: Secretary, Lao Buddhist Monks in the USA
Employer Info: Lao Buddhist Monks in the USA
Subject Matter: Attempts to mediate between Defendants and Wat Lao
Knowledge: Knows of Plaintiff's reputation and good standing in the local national and international Buddhist community; is familiar with customary ways of running a Theravada Buddhist temple, including the customary procedures for receiving donations.

Name: Karen DiFEDERICO
Address: 202 West Washington St, Middleburg, VA 20117
Phone: (540) 687-9760
Occupation: Asst. VP and Market Leader III
Title, Relationship to Parties: Branch Manager at BB&T, relationship banker to Wat Lao Buddhavong
Employer Info: BB&T Bank, 202 West Washington St Middleburg, VA 20117, 540 687 5731, kdifederico@BBandT.com
Subject Matter: Wat Lao financials
Knowledge: Knows of Wat Lao bank accounts, international wire transfers for the Temple in India; financial status, loans, etc. Has intimate knowledge of Plaintiff's income and banking.

Name: Daovone DOUANGDARA
Address: 10589 Tattersall Drive, Manassas, VA 20112
Phone: (703) 789-2884
Occupation: Unknown
Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple
Employer Info: Unknown
Subject Matter: Effect of Defendants' conduct on volunteers at Temple.
Knowledge: She has firsthand experience of the intimidation caused by Defendants' threats described in the complaint, and their efforts to undermine Plaintiff's organization. She has handled the donations at the Temple, and knows how these donations are handled by Plaintiff. She stopped coming to the Temple because of the tortious conduct of the defendants.

Name: Deputy N. EARNSHAW
Address: 78 West Lee st, Warrenton, VA 20186
Phone: 540 422 8857
Occupation: Deputy Sheriff
Title, Relationship to Parties: Local Deputy Sheriff
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186, 540 422 8748
Subject Matter: Complaints at Temple
Knowledge: Responded to reports of violation of no trespassing orders at the Temple on October 8, 2019; upon information and belief, witnessed two of the defendants handling the converted donations of the Plaintiff.

Name: Lt. Colonel Jeremy FALLS
Address: 78 West Lee St, Warrenton, VA 20186
Phone: (540) 422-8602
Occupation: Lt. Colonel Deputy Sheriff
Title, Relationship to Parties: Local Lt. Colonel Deputy Sheriff
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186,
540 422 8748
Subject Matter: Complaints at Temple; Wat Lao Litigation
Knowledge: Responded to complaints at Temple about Defendants and others
trespassing and stealing money.

Name: Ken FARRISH
Address: 3447 Jousters Way, Woodbridge, VA 22192
Phone: (703) 961-1910
Occupation: Service Manager
Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple
Employer Info: AMS of Virginia
Subject Matter: Effects of Defendants' conduct on volunteers and Monks at the Temple.
Knowledge: Has firsthand experience of the intimidation caused by Defendants' threats
described in the complaint, and their efforts to undermine Plaintiff's organization.
Knows how donations are handled by Plaintiff. Stopped coming to the Temple because
of the tortious conduct of the defendants. Knows firsthand how intimidating the
defendants were in their efforts to turn people away from the Temple.

Name: Thai FARRISH
Address: 3447 Jousters Way, Woodbridge, VA 22192
Phone: (571) 384-9846
Occupation: Unknown
Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple
Employer Info: Unknown
Subject Matter: Effect of Defendants' conduct on volunteers at Temple.
Knowledge: She has firsthand experience of the intimidation caused by Defendants'
threats described in the complaint, and their efforts to undermine Plaintiff's
organization. She has observed the customary handling of donations at the Temple, and
knows how these donations are handled by Plaintiff. She stopped coming to the Temple
because of the tortious conduct of the defendants.

Name: Special Deputy Lt. Butler GRANT
Address: Unknown
Phone: (540) 347-3300
Occupation: Unknown
Title, Relationship to Parties: Frequent security detail for major festivals at the
Plaintiff's property.
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186,
540 422 8748
Subject Matter: Business Interference; Wat Lao Festivals

Knowledge: Detailed knowledge of the customary practices, operation and attendance of major annual events of the Plaintiff for the past 20 years; Knowledge of and 20 year communications with the true board of directors; Knowledge of Plaintiff's history of peaceful operations.

Name: Sandy HALL

Address: Unknown

Phone: (757) 354-8457

Occupation: Unknown

Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple

Employer Info: Unknown

Subject Matter: Effect of Defendants' conduct on volunteers at Temple.

Knowledge: She has firsthand experience of the intimidation caused by Defendants' threats described in the complaint, and their efforts to undermine Plaintiff's organization. She has handled the donations at the Temple, and knows how these donations are handled by Plaintiff. She stopped coming to the Temple because of the tortious conduct of the defendants.

Name: Sgt. James HARTMANN

Address: 78 W Lee St #102, Warrenton, VA 20186

Phone: (540) 347-3300

Occupation: Sergeant Deputy Sheriff

Title, Relationship to Parties: Local Deputy Sheriff

Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186, 540 422 8748

Subject Matter: Business Interference; Wat Lao Festivals

Knowledge: Knowledge of public state of confusion and negative opinions circulating internally at the Fauquier County Sheriff's Office regarding authority and confrontational meetings at the Plaintiff's property as recently as February 2020.

Name: Chinawut "Lunn" HENDEE

Address: 13789 Xenwood Ave, Savage, MN 55378

Phone: (612) 518-5548

Occupation: Unknown

Title, Relationship to Parties: Key volunteer office administrator at Wat Lao Buddhavong from 2000 to 2016.

Employer Info: Amazon

Subject Matter: Damages, conversion, and business interference caused by Defendant's

Knowledge: Financial and accounting practices of the Temple

Name: Kanitha HENDEE

Address: Unknown

Phone: Unknown

Occupation: Retired Thai Government Education Official

Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple

Employer Info: Retired

Subject Matter: Damages caused by Defendants

Knowledge: Knows how the Temple operates, how money is collected, and the changes in the environment at the Temple caused by the conduct of Defendants

Name: Thongchine INDAPHONE

Address: 3912 Sunny Creek Dr, Chesterfield, VA 23832

Phone: (703) 999-4599

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors and a frequent Volunteer at Wat Lao Temple.

Employer Info: Unknown

Subject Matter: Wat Lao Temple Activities and Procedures

Knowledge: Knows how the Temple operates, how money is collected, and the changes in the environment at the Temple caused by the conduct of Defendants

Name: Onla INTCHAK

Address: 7314 Wayne Drive, Annandale, VA 22003

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: Defendant in Case; He is listed as a Principal Officer on a fake "Resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual Report filed on September 6, 2019, as a Director and Treasurer. He was identified as part of the conspiracy to injure Plaintiff as described in the complaint. He was formerly a monk in the Temple.

Employer Info: Unknown

Subject Matter: Theft of money from the Temple; fraudulent SCC filings; fake resolution, falsely claiming to be a member of the Board of Directors.

Knowledge: He was present during the theft of money from lock boxes at the Temple, and at meetings where fake officers stole donations from the Temple. He knows the other defendants. He fraudulently claimed to be an officer of Plaintiff corporation.

Name: Touthana Daloc INTHIRATH

Address: 8268 White Pine Drive, Manassas Historic District, VA 20111

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: Actively openly supports Defendants' criminal activities

Employer Info: Unknown

Subject Matter: Conspiracy, Business Interference; Conversion and Fraud.

Knowledge: Detailed knowledge of the Defendants actions and intentions regarding their attacks on the Plaintiff.

Name: Dr. Sheila JAHAN, MD

Address: 1881 North Nash Street, #309 Arlington, VA 22209-1563

Phone: (571) 332-5757

Occupation: Neurologist

Title, Relationship to Parties: Medical Doctor who examined and treated Bounmy Kittiphanh

Employer Info: Board Certified Clinical Neurologist

Subject Matter: Bounmy Kittiphanh's mental state during the period of the Defendants actions outlined in the Complaint.

Knowledge: Knows that Bounmy was not competent to consent to the various conduct of Defendants. In particular, he was not able to hire counsel, bring a lawsuit, or authorize Defendants to impersonate Plaintiff's Board of Directors. She knows that Bounmy did not ask Defendants to "take over" Plaintiff's organization, or to file fraudulent documents with the SCC.

Name: The Venerable Bounmy KITTIPHANE

Address: 3043 Catlett Road, Catlett, VA 20119

Occupation: Emeritus Director

Title, Relationship to Parties: Emeritus Abbott of Wat Lao Buddhavong

Employer Info: Wat Lao Buddhavong

Subject Matter: All facts contained in the Complaint.

Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations.

Name: Jackie KORNEGAY

Address: 320 Hospital Drive, Ste. 11, Alice Jane Childs Building, Warrenton, VA 20186

Phone: (540) 718-2079

Occupation: Adult Protective Services

Title, Relationship to Parties: Public Social Services

Employer Info: Fauquier County Department of Social Services, Adult Protective Services, 320 Hospital Drive, Ste. 11, Alice Jane Childs Building, Warrenton, VA 20186, jackie.kornegay@dss.virginia.gov

Subject Matter: Bounmy Kittiphanh's mental state

Knowledge: Knowledge of Bounmy Kittiphanh's mental state during the time the Defendants were conducting the Conspiracy, Business Interference and

Name: Annie Bounthavalang LANSING

Address: 6606 Woodyard Rd, Upper Marlboro ,MD 20772

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: Actively openly supports Defendants' criminal activities

Employer Info: Unknown

Subject Matter: Theft of money from the Temple; fraudulent SCC filings; fake resolutions; civil conspiracy.

Knowledge: She was present during the theft of money from the Temple on multiple occasions; She was present and directly participated the the Defendants scheme to defraud the public and the temple constituency; She states consistently in published media that she is a legal advisor to the Defendants, and she serves on the board of the Defendants' new organization.

Volunteer Name: Lursak LAOLUESCA

Address: Unknown

Phone: (540) 556-0508
Occupation: Construction
Title, Relationship to Parties: He is a Frequent Volunteer at Wat Lao Temple.
Employer Info: AA Group
Subject Matter: Wat Lao Temple Activities and Procedures; Effect of the Defendant's activities on the volunteers, Monks and international Buddhist Community.
Knowledge: Knows how the Temple operates, how money is collected, and the changes in the environment at the Temple caused by the conduct of Defendants.

Name: Lee LEIDENHEIMER
Address: 202 West Washington St, Middleburg, Virginia 20117
Phone: (540) 687-5448
Occupation: Banker
Title, Relationship to Parties: Access to Plaintiff Bank Accounts
Employer Info: BB&T Bank, 202 West Washington St Middleburg, Virginia 20117, lleidenheimer@BBandT.com
Subject Matter: Banking, Wat Lao Financials, and regular contact with the Board of Directors
Knowledge: Knows of Wat Lao bank accounts, wire transfers to India; financial status, loans, etc. Has intimate knowledge of Plaintiff's income and banking.

Other Name: Sister Than LIEU
Address: 2101 James Madison Highway, Haymarket, VA 20169
Phone: (571) 261-2408
Occupation: Abbess of Vietnamese Mahayana Buddhist Temple
Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple
Employer Info: Tuong Van Auspicious Cloud Temple, 2101 James Madison Highway Haymarket, VA 20169, (571) 261-2408
Subject Matter: Effect of Defendants' conduct on volunteers at Temple.
Knowledge: She has firsthand experience of the intimidation caused by Defendants' threats described in the complaint, and their efforts to undermine Plaintiff's organization. She has handled the donations at the Temple, and knows how these donations are handled by Plaintiff. She stopped coming to the Temple because of the tortious conduct of the Defendants.

Name: Sam LITHISAK
Address: 8268 White Pine Drive, Manassas Historic District, VA 20111
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Actively openly supports Defendants' criminal activities
Employer Info: Unknown
Subject Matter: Criminal activities of the Defendants
Knowledge: Knowledge of the theft of money from the Temple on multiple occasions; participated in the Defendants meetings to conspire to defraud the public and the Temple constituency.

Name: Maxwell MALMGREN

Address: Unknown

Phone: Unknown

Occupation: Atlantic Union Bank Branch Manager at Blackwell Road Branch.

Title, Relationship to Parties: Relationship Banker to the Plaintiff

Employer Info: Atlantic Union Bank, 530 Blackwell Road Warrenton, VA 20186, (540) 680-5051, maxwell.malmgren@atlanticunionbank.com.

Subject Matter: Banking practices of Plaintiff; true facts regarding the Defendant's visits to Atlantic Union Bank; the Plaintiff's financials; the negative impact of the Defendants' actions on the Plaintiff's business reputation and credit risk; behavior, function and operation of the Plaintiff's Board of Directors.

Knowledge: Detailed knowledge of the cash and credit management practices of the Plaintiff from the perspective of the financial institution; Was present in the Temple and participated in a public ceremony regarding the purpose, intent, and execution of the refinancing of the 2012 loan.

Name: Captain Micah A. MEADOWS

Address: 78 West Lee st, Warrenton, VA 20186

Phone: (540) 270 8399

Occupation: Local law enforcement

Title, Relationship to Parties: Provided security for Temple events for approximately 20 years.

Employer Info: Fauquier County Sheriff, 78 West Lee St, Warrenton, VA 20186, 540 422 8748

Subject Matter: History of the Temple's daily operations and festivals.

Knowledge: Knows how the Temple operates, how money is collected, and the changes in the environment at the Temple caused by the conduct of Defendants.

Name: Mani MIDDLETON

Address: Unknown

Phone: (571) 662-6535

Occupation: Unknown

Title, Relationship to Parties: Frequent volunteer at Wat Lao Temple.

Employer Info: Unknown

Subject Matter: Effects of Defendants' tortious conduct on Temple and on the volunteers and constituents.

Knowledge: Knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; the effect of Defendants' conduct on the Temple; Directly witnessed Defendants converting Plaintiff's donations.

Name: Achan Ontha MINGSISOUPHANH

Address: 3043 Catlett Rd, Catlett, VA 20119

Phone:(703) 884-6668

Occupation: Theravada Buddhist Monk

Title, Relationship to Parties: Resident Theravada Buddhist Monk, Board Member, and Officer of Plaintiff.

Employer Info: Wat Lao Buddhavong 3043 Catlett Road, Catlett, VA 20119

Subject Matter: All the facts outlined in the Complaint.

Knowledge: First hand knowledge of every aspect of the construction of the Temple in India; how the loan money is used; how the temple in India was purchased; the negative impact of Defendants' conduct on the volunteers, the Monks and the international Buddhist Community; Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: The Venerable Achan Dr. Phonexay MINGSISOUPHANH

Address: 3043 Catlett Road, Catlett, VA 20119

Occupation: Theravada Buddhist Monk

Title, Relationship to Parties: Abbott, Current Board Member and President of Wat Lao

Employer Info: Wat Lao Buddhavong Inc, 3043 Catlett Road, Catlett, VA 20119

Subject Matter: All facts contained in the Complaint.

Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations.

Name: Max MOUNKHATY

Address: 8108 Whispering Wind Lane, Manassas, VA 20111

Phone: (703) 861-9580

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors and actively and openly supports Defendants' criminal activities.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Paul MOUNKHATY

Address: 1778 Clovermeadow Dr., Vienna, VA 22182

Phone: (202) 631-7183

Occupation: Unknown

Title, Relationship to Parties: former member of the Wat Lao Board of Directors; Active open supporter of Defendants' criminal activities.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Thinnat NACHAMPASAK

Address: 7028 Rhoden Ct Apt 203, Springfield, VA 22151

Occupation: Unknown

Title, Relationship to Parties: Current Vice President and Director of Wat Lao Buddhavong
Employer Info: Unknown
Subject Matter: Effects of Defendants' tortious conduct on Temple
Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the negative effect of Defendants' conduct on the volunteers, Monks and the international Buddhist Community; Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Mongkham NANTHAVONG
Address: 6814 Kingwood Drive, Falls Church, VA 22042
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Active open supporter of Defendants' criminal activities.
Employer Info: Unknown
Subject Matter: Criminal activities of the Defendants
Knowledge: Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: William NGUAMSANITH
Address: 13621 Old Dairy Road, Herndon, VA 33414
Phone: (571) 525-4706
Occupation: IT Professional
Title, Relationship to Parties: Daily regular volunteer at Wat Lao Temple
Employer Info: Self Employed
Subject Matter: Effects of Defendants' tortious conduct on Temple and on the volunteers, Monks and the international Buddhist community.; Effect of Defendants' conduct on volunteers and Monks at Temple and the international Buddhist community.
Knowledge: Knows who the true board members are; has direct knowledge of how Wat Lao handles donations; the effect of Defendants' conduct on the Temple. He sought treatment and withdrew from the Temple for approximately two months as a result of the harassment by Defendants. Administrative operations of Plaintiff organization

Name: Vilayuanh NOUNNENNADY
Address: 5211 Dalton Road, Springfield, VA 22151
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Actively openly supports Defendants' criminal activities
Employer Info: Unknown
Subject Matter: Criminal activities of the Defendants
Knowledge: Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Sen PANTAVONG

Address: 8404 Summer Breeze Place, Manassas, VA 20112

Phone: (571) 277-1466

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Mixay PANYASITH

Address: 5732 Wood Creekland, Centreville, VA 20120

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: Defendant in case; she is listed as a Treasurer and Trustee/Director on a fake "Resolution" dated August 26, 2019; he is listed on the fraudulent VA SCC Annual Report filed on September 6, 2019, as a Director and Treasurer.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Norasack "Jok" PATHAMMAVONG

Address: 6469 3rd Street, Alexandria, VA 22312

Phone: (703) 256-3348

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Suwed PATHAMMAVONG

Address: 22050 Auction Barn Drive, Ashburn, VA 20148

Phone: (703) 244-1533

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors and active supporter of the Defendant's Criminal Activities.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Khamphout "Phouth" PHANTHAVONG

Address: Unknown

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is listed as a Trustee/Director on a fake "Resolution" dated August 26, 2019; he is listed on the fraudulent VA SCC Annual Report filed on September 6, 2019, as a Trustee/Director; Active supporter of the Defendant's Criminal Activities.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Vath PHIMMAKAYSONE

Address: 14704 Links Pond Circle, Gainesville, VA 20155

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is listed as a Trustee/Director on a fake "Resolution" dated August 26, 2019; he is listed on the fraudulent VA SCC Annual Report filed on September 6, 2019, as a Trustee/Director; Active supporter of the Defendant's criminal activities.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Phouvathatinh PHOMMADNAMH

Address: Unknown

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is listed as a Principal Officer on a fake "Resolution" dated August 26, 2019 and posted on the front door of Plaintiff's Temple. He is listed on the fraudulent VA SCC Annual Report filed on September 6, 2019, as a Director and Secretary; he was part of the original conspiracy to injure Plaintiff as described in the complaint.

Employer Info: Unknown

Subject Matter: The creation of the fake "Board of Directors" of Wat Lao; conspiracy to injure Plaintiff as detailed in the complaint; the theft of money from the Temple.

Knowledge: He has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; he has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: David PHOMMAVONG

Address: 2500 47th Ave, Sacramento, CA 95822

Phone: (916) 719-2307

Occupation: Unknown

Title, Relationship to Parties: Took part in meetings held by fake Board of Directors

Employer Info:

Subject Matter: The creation of the fake "Board of Directors" of Wat Lao; conspiracy to injure Plaintiff as detailed in the complaint; the theft of money from the Temple.

Knowledge: He has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; he has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple

Name: Maly Siri PHOMMAVONG (Molly MALARANH)

Address: 2500 47th Ave, Sacramento, CA 95822

Phone: (916) 719-2307

Occupation: Vlogger

Title, Relationship to Parties: Has attempted to coerce board members to resign by threatening to make false criminal allegations about one of the monks at the Temple. She posted a video online in which she made these threats.

Employer Info:

Subject Matter: The creation of the fake "Board of Directors" of Wat Lao; conspiracy to injure Plaintiff as detailed in the complaint; the theft of money from the Temple.

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Panta Ratana PHRASAVATH

Address: 4505 Holmes Run Pkwy, Alexandria, VA 22304

Phone: (571) 326-8750

Occupation: Unknown

Title, Relationship to Parties: Current Vice President and Director of Wat Lao Buddhavong

Employer Info: Unknown

Subject Matter: Effects of Defendants' tortious conduct on Temple

Knowledge: Knows the true bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple.

Name: Nina RATANAVONG

Address: 13536 Quate Lane, Woodbridge, VA 22193

Phone: (703) 419-0103

Occupation: Patent Clerk

Title, Relationship to Parties: Volunteer at Wat Lao Buddhavong

Employer Info: United States Patent Office

Subject Matter: Effect of Defendants' conduct on volunteers at Temple.
Knowledge: She has firsthand experience of the intimidation caused by Defendants' threats described in the complaint, and their efforts to undermine Plaintiff's organization. She has handled the donations at the Temple, and knows how these donations are handled by Plaintiff. She stopped coming to the Temple because of the tortious conduct of the defendants.

Name: Chanthavy RATTANA

Address: 199 Old Centreville Road, Manassas Park, VA 20111

Phone: (703) 368-1561

Occupation: Unknown

Title, Relationship to Parties: Frequent Volunteer at Temple

Employer Info: Self Employed

Subject Matter: Effects of Defendants' tortious conduct on Temple

Knowledge: Knows the true bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple.

Name: Khamsing THANASAK RATTANA

Address: 199 Old Centreville Road, Manassas Park, VA 20111

Phone: (908) 309-8500

Occupation: Unknown

Title, Relationship to Parties: Frequent Volunteer at Temple

Employer Info: Unknown

Subject Matter: Effects of Defendants' tortious conduct on Temple

Knowledge: Knows the true bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple.

Name: Saysamone RATTANA

Address: 199 Old Centreville Road, Manassas Park VA 20111

Phone: (703) 895-8648

Occupation: Unknown

Title, Relationship to Parties: Frequent Volunteer at Temple

Employer Info: Unknown

Subject Matter: Effects of Defendants' tortious conduct on Temple

Knowledge: Knows the true bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple.

Name: Viradeth RATTANA

Address: Unknown

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.
Employer Info: Unknown
Subject Matter:
Knowledge: Knowledge of Defendant Sayithsena's previous attempts to take control of the Temple; Directly witnessed Defendants converting Plaintiff's donations and conspiring to take over the Plaintiff.

Name: Sonia REINGRUBER
Address: Unknown
Phone: Unknown
Occupation: Assistant Vice President Branch Manager III
Title, Relationship to Parties: 15 year Personal Banker at BB&T for Wat Lao Temple
Employer Info: Carter Bank and Trust, 806 Nottingham Street Culpepper, VA 22701-2327, (540) 825-8228
Subject Matter: Banking, Wat Lao Financials and Accounting
Knowledge: knows how the Temple collects and manages monetary donations and other funds.

Name: Kimberly RICHARDS
Address: Midland, VA 22728
Phone: (540) 455-3173
Occupation: Unknown
Title, Relationship to Parties: Defendant in Case; Real Estate Agent; Actively openly incites and supports Defendants' criminal activities
Employer Info: Unknown
Subject Matter: Conversion; fraud; conspiracy
Knowledge: present

Name: Andy ROSE
Address: Unknown
Phone: (540) 784-9276
Occupation: Banker
Title, Relationship to Parties: Access to Plaintiff Bank Accounts
Employer Info: Atlantic Union Bank, 102 S. Main Street, Culper, VA 22701, (540) 829-1610, andy.rose@atlanticunionbank.com
Subject Matter: Wat Lao's finances, banking
Knowledge: He handled loans for Wat Lao and could talk about those loans, their purpose, Wat Lao's responsibility in paying those loans, etc; Was present in the Temple and participated in a public ceremony regarding the purpose, intent, and execution of the refinancing of the 2012 loan.

Name: Anant SANANIKONE
Address: 195 Heather Glen Road, Sterling VA 20165
Phone: (703) 371-9304
Occupation: Unknown
Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.
Employer Info: Unknown

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Mark SANDGROUND

Address: 8500 Leesburg Pike, Tysons Corner, Virginia 22182

Phone: (703) 564-4600

Occupation: Attorney

Title, Relationship to Parties: Former Attorney for at least some of the defendants; in particular, Defendant Sayasthena has admitted hiring this attorney.

Employer Info: West Law Group

Subject Matter: Meetings of defendants impersonating board members

Knowledge: He attended public meetings held by the fake board members, possibly during their fake "elections." Has firsthand knowledge of what transpired during these meetings.

Name: Sisomphanh SANGINTHIRATH

Address: 10103 Cotter Court, Fredericksburg VA 22408

Phone: (703) 505-3414

Occupation: IT professional

Title, Relationship to Parties: Current Board Member and Vice President of Plaintiff

Employer Info: Unknown

Subject Matter: Wat Lao Practices and Affairs

Knowledge: Knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; the effect of Defendants' conduct on the Temple. He sought treatment and withdrew from the Temple for approximately two months as a result of the harassment by Defendants.

Name: Boukhay SAYASITSENA

Address: 3904 South Spring Drive Centreville, VA 20124

Phone: (571) 334-3953

Occupation: Unknown

Title, Relationship to Parties:

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Somphone SAYASITSENA

Address: 13904 South Spring Drive Centreville, VA 20124

Phone: (703) 266-0370

Occupation: Unknown

Title, Relationship to Parties:

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Souksomboun SAYASITHSENA

Address: 7313 Wayne Drive, Annandale, VA 22003

Phone: (703) 266-0370

Occupation: Unknown

Title, Relationship to Parties: Defendant in case; He is listed as a Trustee/Director on a fake "resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual report filed on September 6, 2019 as a Trustee/Director.

Employer Info: Unknown

Subject Matter: the tortious conduct of all Defendants, including the allegations in the complaint

Knowledge: He has direct knowledge of the true bylaws; He has admitted publicly to hiring an attorney to file suit on behalf of the people impersonating board members of Wat Lao; he has attended meetings of the fake board members, and therefore has personal knowledge of what transpired at the meetings. He knows the other defendants in this case, and presumably has spoken to them about their conduct that led to the present lawsuit, including the tortious schemes described in the complaint. He attempted once before to overthrow the board of directors, and was unsuccessful.

Name: Khamphou SAYKHAMPHONE

Address: Unknown

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is a fraudulent Secretary appointed by the fraudulent "Board".

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Watt SENGKHYAVONG

Address: 9155 Ogden Park Court, Bristow VA 20136

Phone: (703) 231-3460

Occupation: Unknown

Title, Relationship to Parties: Defendant in Case; he is a former member of the Wat Lao Board of Directors. He is listed on the fraudulent VA SCC Annual report filed on September 6, 2019 as an Officer and Director.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Achan Khammany SIKHAMMOUNTRY

Address: Pennsylvania

Phone: Unknown

Occupation: Theravada Buddhist Monk

Title, Relationship to Parties: Visiting Theravada Buddhist Monk at Wat Lao Temple

Employer Info: Unknown

Subject Matter:

Knowledge:

Name: Sengmany SIRIOVEVONG

Address: Unknown

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: He is listed as an Accountant and Trustee/Director on a fake "resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual report filed on September 6, 2019 as a Director and Accountant.

Employer Info: Unknown

Subject Matter: Criminal activities of the Defendants

Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Souliyo SIRIPHANH

Address: PO Box 55, Nokesville VA 20182-0055

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: Frequent Volunteer at Wat Lao

Employer Info: Unknown

Subject Matter: Effect of Defendants' conduct on volunteers at Temple.

Knowledge: She has firsthand experience of the intimidation caused by Defendants' threats described in the complaint, and their efforts to undermine Plaintiff's organization. She has handled the donations at the Temple, and knows how these donations are handled by Plaintiff.

Name: Achan Noumay SIRIPHOUNSAVAT

Address: 3043 Catlett Road, Catlett VA 20119

Phone: (540) 522-6370

Occupation: Theravada Buddhist Monk
Title, Relationship to Parties: Senior Monk at Wat Lao Temple
Employer Info: Self Employed
Subject Matter: Conversion of money from the temple
Knowledge: Directly witnessed Defendants converting Plaintiff's donations; was aghast at seeing this; has knowledge of how the Temple handles donations; knows that Defendants were taking money without authorization to do so.

Name: Vaneta SISOUTHO
Address: 11004 Lonesome Road, Nokesville VA 20181
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties:
Employer Info: Unknown
Subject Matter: Criminal activities of the Defendants
Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Phet SITHAMMAVONG
Address: Unknown
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Officer and Director on Fraudulent VA SCC Filing
Employer Info: Unknown
Subject Matter: Criminal activities of the Defendants
Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Khamla STEVENS
Address: 3383 Nadia Loop, Woodbridge VA 22193
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Defendant in case; He is listed as a Treasurer and Trustee/Director on a fake "resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual report filed on September 6, 2019 as a Director and Treasurer.
Employer Info: Unknown
Subject Matter: Criminal activities of the Defendants
Knowledge: has personal knowledge of Defendants' creation of a fake Board of Directors and their false claim to represent Plaintiff, in an effort to take control of Plaintiff corporation and to take money from the Temple; has firsthand knowledge of the

tortious schemes described in the complaint, including the theft of money from the Temple.

Name: Deputy A.M. STRIBLING
Address: 78 West Lee st, Warrenton VA 20186
Phone: (540) 347-3300
Occupation: Deputy Sheriff
Title, Relationship to Parties: Local Law Enforcement
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186, 540 422 8748
Subject: He responded to a call from the Temple on October 19, 2019, to remove Kim Richards and Onla Inthichak from the property, and declined to remove them due to confusion created by the Defendants.

Name: Lamkeo SYSAVAT
Address: 10302 Copeland Drive, Manassas, VA 20109
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Defendant in case; he is listed as a Secretary and Trustee/Director on a fake "resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual report filed on September 6, 2019 as a Director and Vice President.
Subject Matter: Conspiracy; business interference; conversion; and identity fraud.
Knowledge: Defendants' various tortious conduct; Is an integral part of the conspiracy to injure Wat Lao; knows who was active in the conspiracy and what they did to injure Wat Lao; he posed as the president of Wat Lao Buddhavong in fraudulent documents filed with the VA SCC and openly circled and posted on Plaintiffs property.

Name: Special Dep Charlie TAYLOR
Address: 78 W Lee St #102, Warrenton, VA 20186
Phone: (540) 547-2527
Occupation: Special Deputy Sheriff
Title, Relationship to Parties: Local Law Enforcement, Frequent Security Services at Temple Events
Employer Info: Fauquier County Sheriff's Office, 78 West Lee St, Warrenton, VA 20186, 540 422 8748
Subject Matter: Complaints about Defendants at Temple
Knowledge: responded to no trespass violations

Name: Ketsada THANASOUK
Address: 5023 Goodwins Landing Drive, Remington, VA 22734
Phone: (703) 398-7539
Occupation: Unknown
Title, Relationship to Parties: Vice President and Director of Wat Lao Buddhavong
Employer Info: Unknown
Subject Matter: Wat Lao Buddhavong Practices and Operations

Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temple. Directly witnessed Defendants converting Plaintiff's donations.

Name: Honkeo THEPHSOURINTHONE

Address: 199 Old Centreville Road, Manassas Park, VA 20111

Phone: (571) 606-0632

Occupation: Buddhist Nun

Title, Relationship to Parties: Frequent Volunteer at Wat Lao Temple

Employer Info: Self Employed

Subject Matter: Processing of donations at Temple

Knowledge: Knows the money protocols at the Temple, including how cash donations are processed

Name: Ilene Marie TOGNINI, Esq.

Address: 12161 Ken Adams Way, Ste. 211 Wellington FL 33414

Phone: (561) 227-1519

Occupation: Attorney

Title, Relationship to Parties: Board Member and Secretary of Plaintiff

Employer Info: Eques Law PA 12161 Ken Adams Way Ste. 211Wellington FL 33414 561-227-1519 itognini@equeslaw.us

Subject Matter: All facts contained in the Complaint.

Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temples.

Name: Dr. Thong VANNARATH

Address: 2404 Northwest 23rd Street, Oklahoma City, OK 70307

Oklahoma City, OK 70307

Phone: (405) 413-7858

Occupation: Chiropractor

Title, Relationship to Parties: Leader of Wat Lao Buddharam Oklahoma, Supporter of Wat Lao Buddhavong

Employer Info: self employed Defendant's intentional interfere

Subject Matter: Defendants' online comments and social media. Business INterference, Fraud.

Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temples.

Name: Achan Dr. VANNAXAY
Address: Nakhon Phanom, Thailand
Phone: Unknown
Occupation: Senior Theravada Buddhist Monk
Title, Relationship to Parties: Monk PhD
Employer Info: Mahachulalongkornrajavidyalaya University
Subject Matter: Monk Practices and Traditions
Knowledge: Knows the true Bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temples.

Name: John VINCIE, CPA
Address: 29 Culpeper Street, Warrenton, VA 20186
Phone: (540) 349-3830
Occupation: Accountant
Title, Relationship to Parties: CPA,
Employer Info: PBMares, 29 Culpeper Street Warrenton, VA 20186
Subject Matter: Accounting, bookkeeping and record-keeping practices of Wat Lao
Knowledge: Performed most of the work for an audit of Wat Lao's finances and so has detailed knowledge that all of Wat Lao's money was accounted for, that is, was not taken by the board members.

Name: Vilayvone VISOUTSRI
Address: Unknown
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: He is a fraudulent Secretary appointed by the fraudulent "Board".
Employer Info: Unknown
Subject Matter: Conspiracy; business interference; conversion; and identity fraud.
Knowledge: Defendants' various tortious conduct; Is an integral part of the conspiracy to injure Wat Lao; knows who was active in the conspiracy and what they did to injure Wat Lao; he posed as the president of Wat Lao Buddhavong in fraudulent documents filed with the VA SCC and openly circled and posted on Plaintiffs property.

Name: Khamkong VONGNARAJ
Address: Unknown
Phone: Unknown
Occupation: Unknown
Title, Relationship to Parties: Fraudulent Officer appointed by fraudulent Board
Employer Info: Unknown
Subject Matter: Conspiracy; business interference; conversion; and identity fraud.
Knowledge: Defendants' various tortious conduct; Is an integral part of the conspiracy to injure Wat Lao; knows who was active in the conspiracy and what they did to injure

Wat Lao; he posed as the president of Wat Lao Buddhavong in fraudulent documents filed with the VA SCC and openly circled and posted on Plaintiffs property.

Name: Khankab VONGPRACHANH

Address: 6828 Donahue Ct, Falls Church VA 22042

Phone: (703) 533-9324

Occupation: Roofer

Title, Relationship to Parties: He is listed as a Trustee/Director on a fake "resolution" dated August 26, 2019. He is listed on the fraudulent VA SCC Annual report filed on September 6, 2019 as a Trustee/Director.

Employer Info: Unknown

Subject Matter: Conspiracy; business interference; conversion; and identity fraud.

Knowledge: Defendants' various tortious conduct; Is an integral part of the conspiracy to injure Wat Lao; knows who was active in the conspiracy and what they did to injure Wat Lao; he posed as the president of Wat Lao Buddhavong in fraudulent documents filed with the VA SCC and openly circled and posted on Plaintiffs property.

Name: Soumary VONGGRASSAMY

Address: 8201 16th Street 614, Silver Springs MD 20910

Phone: (608) 628-8979

Occupation: Unknown

Title, Relationship to Parties: He is a former member of the Wat Lao Board of Directors.

Employer Info: Unknown

Subject Matter: Conspiracy; business interference; conversion; and identity fraud.

Knowledge: Defendants' various tortious conduct; Is an integral part of the conspiracy to injure Wat Lao; knows who was active in the conspiracy and what they did to injure Wat Lao; he posed as the president of Wat Lao Buddhavong in fraudulent documents filed with the VA SCC and openly circled and posted on Plaintiffs property.

Name: Phonephet Oy VONGSAVAT

Address: 10302 Copeland Drive Manassas, VA 20109

Phone: Unknown

Occupation: Unknown

Title, Relationship to Parties: Lamkeo Sisavat wife,

Employer Info: Unknown

Subject Matter: Defendants' various tortious conduct

Knowledge: Knows who was active in the conspiracy and what they did to injure Wat Lao Buddhavong

Name: Pam Phayaliane VORACHAK

Address: 6911 Rolling Road, Springfield, VA 22151

Phone: (703) 909-3320

Occupation: Salon Owner

Title, Relationship to Parties: Vice President, Treasurer, and Director of Wat Lao Buddhavong

Subject Matter: Wat Lao Practices and Affairs

Knowledge: Knows the true bylaws of Wat Lao; knows who the true board members are; has intimate knowledge of how Wat Lao handles donations; how the loan money is used; how the temple in India was purchased; the effect of Defendants' conduct on the Temple; knowledge of Defendant Sayithsena's previous attempts to take control of the Temple.

Name: John WILSON, Esq.

Address: 1812 E. Ocean View Ave, Norfolk, VA 23503

Phone: (757) 233-2922

Occupation: Attorney

Title, Relationship to Parties: Frequent volunteer at Wat Lao Temple; has ordained as a Novice Monk to serve for short periods at the Temple.

Employer Info: Self Employed

Subject Matter: Effect of Defendants' conduct on volunteers, Monks and the regional Buddhist community.

Knowledge: He has first hand experience and knowledge of the customary practices for the proper manner for the Monk's handling of donations at the Temple.

2) Please identify each and every member of Plaintiff's Board for the past fifteen (15) years.

ANSWER:

Southalavong Boutah
The Venerable Bounmy Kittiphane
Khamsao Civilize
Thongchine Indaphone
Achan Ontha Mingsisouphanh
The Venerable Dr. Phonexay Mingsisouphanh
Max Mounkhaty
Paul Mounkhaty
Thinnat Nachampasak
Sen Pantavong
Norasack Pathammavong
Suwed Pathammavong
Panta Ratana Phrasavath
Viradeth Rattana
Anant Sananikone
Sisomphanh Sanginthirath
Watt Sengkhyavong
Daeng Sangmany
Ketsada Thanasouk
Ilene Marie Tognini, Esq.
Soumary Vongrassamy
Pam Phayaliane Vorachak

- 3) Please identify each expert witness whom you intend to call at trial in this matter and as to each such expert state the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, and provide a summary of the grounds for each such opinion.

ANSWER:

No plans to call an expert as of yet.

- 4) Identify each and every audit, investigation, or review done of any aspect of Plaintiff's finances in the past fifteen (15) years, including but not limited to who conducted the audit, investigation, or review; any written documents that exist and where such documents are kept.

ANSWER:

From 2004 to the present, John Vincie CPA and staff at PB Mares - a Certified Public Accounting firm located at 33 Culpeper Street Warrenton, Virginia 20186 have conducted periodic reviews of the financial records of Wat Lao Buddhavong including analysis of revenue and expenses; donor reporting; financial statement presentment; assets and liabilities; and depreciation calculations. The product of all such reviews has been fully incorporated into the Independent Accountant Compilation Reports of the Consolidated Financial Statements of the Plaintiff for the years 2015, 2016, 2017 and 2018. PB Mares is currently preparing the Independent Accountant Compilation Report of the Consolidated Financial Statements of the Plaintiff as well as the 990 for the year 2019.

- 5) For each and every allegation of wrongdoing by any or all Defendant(s) in your Complaint, identify the specific Defendant or other person you contend engaged in that conduct and all facts that support your contention.

ANSWER:

The counts raised in the initial complaint apply to all defendants. The facts that support this contention are set out in the complaint. See also the responses to interrogatory 1.

SOUKSOMBOUN SAYASITHSENA: See answers to interrogatories 8 and 9. In addition, conduct constituting wrongdoing outlined in the Complaint includes but is not limited to publishing false and defamatory statements on social media and other places online from 2006 to the present; Breaking into locked cash donation boxes and converting the contents to personal use on multiple occasions beginning as early as August 31st, 2019; Hiring a lawyer to file a sham lawsuit without any intent of following through; Filing multiple fraudulent documents with the VA SCC; Authorizing fraudulent no-trespass orders against the true Board of Directors and other members and posting them on the

front doors of the Temple causing great confusion; Attempting to infiltrate the corporation and the Board of Directors by conducting fraudulent "elections", fabricating a set of fake "bylaws", and intimidating the authentic Board of Directors and the worshippers who faithfully follow them; Conducting fraudulent public fundraisers collecting over \$50K in contributions in the name of Wat Lao Buddhavong and keeping the money; Embezzling and or converting donations from active ceremonies conducted inside the Temple property and permanently removing the money from the Temple; Opening new telephone accounts fraudulently using the Plaintiff's identity; Opening new bank accounts fraudulently using the Plaintiff's identity; Organizing an elaborate and concerted effort via social media and in person meetings to dissuade, threaten, and scare existing members from attending or supporting the Temple; and widely proliferating false and morally reprehensible statements to grieving family members that the remains of their deceased relatives were going to be "bulldozed over" by the current leadership.

Facts in support include but are not limited to:

Photographic, video and published evidence of Defendant conducting the wrongful activities. Specific documentary evidence is included with the Plaintiff's response to the Defendants' Request for Production of Documents. For example, Watt Sengkhayavong admitted the defendants' wrongdoing on Oct 8th, 2019 on Facebook.

LAMKEO SYSAVAT: See answers to interrogatories 8 and 9. In addition, conduct constituting wrongdoing outlined in the Complaint includes but is not limited to publishing false and defamatory statements on social media and other places online; Breaking into locked cash donation boxes and converting the contents to personal use on multiple occasions beginning as early as August 31st, 2019; Authorizing fraudulent no-trespass orders against the true Board of Directors and other members and posting them on the front doors of the Temple causing great confusion; Filing multiple fraudulent documents with the VA SCC; Attempting to infiltrate the corporation and the Board of Directors by conducting fraudulent "elections", fabricating a set of fake "bylaws", filing a lawsuit without any intent of following through; and intimidating the authentic Board of Directors and the worshippers who faithfully follow them; Conducting fraudulent public fundraisers collecting over \$50K in contributions in the name of Wat Lao Buddhavong and keeping the money; Embezzling and or converting donations from active ceremonies conducted inside the Temple property and permanently removing the money from the Temple; Opening new telephone accounts fraudulently using the Plaintiff's identity; Opening new bank accounts fraudulently using the Plaintiff's identity; Organizing an elaborate and concerted effort via social media and in person meetings to dissuade, threaten, and scare existing members from attending or supporting the Temple; and Widely proliferating false and morally reprehensible statements to grieving family members that the remains of their deceased relatives were going to be "bulldozed over" by the current leadership.

Facts in support include but are not limited to:

Photographic, Video and published evidence of defendant conducting the wrongful activities. Specific documentary evidence is included with the Plaintiff's response to the Defendants' Request for Production of Documents. For example, Watt Sengkhyavong admitted the defendants' wrongdoing on Oct 8th, 2019 on Facebook.

MIXAY PANYASITH: See answers to interrogatories 8 and 9. In addition, conduct constituting wrongdoing outlined in the Complaint includes but is not limited to:
Publishing false and defamatory statements on social media and other places online;
Breaking into locked cash donation boxes and converting the contents to personal use on multiple occasions beginning as early as August 31st, 2019;
Authorizing fraudulent no-trespass orders against the true Board of Directors and other members and posting them on the front doors of the Temple causing great confusion;
Filing multiple fraudulent documents with the VA SCC;
Attempting to infiltrate the corporation and the Board of Directors by conducting fraudulent "elections", fabricating a set of fake "bylaws", filing a lawsuit without any intent of following through, and intimidating the authentic Board of Directors and the worshippers who faithfully follow them;
Conducting fraudulent public fundraisers collecting over \$50K in contributions in the name of Wat Lao Buddhavong and keeping the money;
Embezzling and or converting donations from active ceremonies conducted inside the Temple property and permanently removing the money from the Temple;
Opening new telephone accounts fraudulently using the Plaintiff's identity;
Opening new bank accounts fraudulently using the Plaintiff's identity;
Organizing an elaborate and concerted effort via social media and in person meetings to dissuade, threaten, and scare existing members from attending or supporting the Temple; and
Widely proliferating false and morally reprehensible statements to grieving family members that the remains of their deceased relatives were going to be "bulldozed over" by the current leadership.

Facts in support include but are not limited to:
Photographic, Video and published evidence of defendant conducting the wrongful activities. Specific documentary evidence is included with the Plaintiff's response to the Defendants' Request for Production of Documents. For example, Watt Sengkhyavong admitted the defendants' wrongdoing on Oct 8th, 2019 on Facebook.

KHAMLA STEVENS: See answers to interrogatories 8 and 9. In addition, conduct constituting wrongdoing outlined in the Complaint includes but is not limited to:
Publishing false and defamatory statements on social media and other places online;
Breaking into locked cash donation boxes and converting the contents to personal use on multiple occasions beginning as early as August 31st, 2019;
Filing multiple fraudulent documents with the VA SCC;
Authorizing fraudulent no-trespass orders against the true Board of Directors and other members and posting them on the front doors of the Temple causing great confusion;
Attempting to infiltrate the corporation and the Board of Directors by conducting fraudulent "elections", fabricating a set of fake "bylaws", filing a lawsuit without any

intent of following through, and intimidating the authentic Board of Directors and the worshippers who faithfully follow them;
Conducting fraudulent public fundraisers collecting over \$50K in contributions in the name of Wat Lao Buddhavong and keeping the money;
Embezzling and or converting donations from active ceremonies conducted inside the Temple property and permanently removing the money from the Temple;
Opening new telephone accounts fraudulently using the Plaintiff's identity;
Opening new bank accounts fraudulently using the Plaintiff's identity;
Organizing an elaborate and concerted effort via social media and in person meetings to dissuade, threaten, and scare existing members from attending or supporting the Temple; and
Widely proliferating false and morally reprehensible statements to grieving family members that the remains of their deceased relatives were going to be "bulldozed over" by the current leadership.

Facts in support include but are not limited to:

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KIMBERLY RICHARDS: See answers to interrogatories 8 and 9. In addition, conduct constituting wrongdoing outlined in the Complaint includes but is not limited to:
Publishing false and defamatory statements on social media and other places online;
Breaking into locked cash donation boxes and converting the contents to personal use on multiple occasions beginning as early as August 31st, 2019;
Filing multiple fraudulent documents with the VA SCC and providing them to police authority in order to confuse and hinder their ability to do their job properly;
Authorizing fraudulent no-trespass orders against the true Board of Directors and other members and posting them on the front doors of the Temple causing great confusion;
Attempting to infiltrate the corporation and the Board of Directors by conducting fraudulent "elections", fabricating a set of fake "bylaws", filing a lawsuit without any

intent of following through, and intimidating the authentic Board of Directors and the worshippers who faithfully follow them;
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- 6) In Paragraph 11 of the Complaint, you allege that "Wat Lao's primary source of income is from donations made by the public at the Temple." Identify each and every other source of income that you claim is a source for Wat Lao.

ANSWER:

In addition to unrestricted and restricted contributions, Wat Lao Buddhavong also receives gifts in kind and earns interest income.

- 7) Identify each and every person who has been hired by Plaintiff or Plaintiff's Board to conduct any audit, investigation of finances, and/or any other review of any financial aspect of Plaintiff, including but not limited to any bookkeeper, CPA, or other financial consultant hired by Plaintiff or its Board at any time in the past fifteen (15) years.

ANSWER:

Jason Bell
JBee Accounting
PO Box 603
Warrenton VA 20188
(540) 878-5924
jbeeacctservices@gmail.com

Star Eiting
Northrock Reports
20118 N 67th Ave Ste 300-615
Glendale, AZ 85308
(602) 989-9993
star.eiting@gmail.com

K&L Business Solutions
Kristen Leicht
4650 Margarets Drive
Harrisburg PA 17110
(717) 309-3347

PBMares
33 Culpeper Street
Warrenton, VA 20186
(888) 846-8917
John Vincie, CPA
Jonny Rosch, CPA
Linda Fisher

Gabriella Wlassits
45535 Hutchens Square
Sterling, VA 20166
gabriellawlassits@hotmail.com

Linda Woodman
11401 Old Stillhouse Road
Boston, VA 22713-4317
(540) 718-2977

- 8) Identify each and every act in which that you allege was engaged in support of the alleged “**conspiracy**” against Plaintiff, the specific Defendant or other person who engaged in that act, and the time, date, and place of each such act.

ANSWER:

SOUKSOMBOUN SAYASITHSENA: See answer to interrogatory 5. In addition, the conduct constituting conspiracy as outlined in the Complaint includes but is not limited to: Defendants have been and continue to conspire and plan amongst one another and accomplices with the specific and malicious intent to damage Wat Lao in its reputation, business, and trade along with the goal of creating a contentious atmosphere at the Temple that is antithetical to Wat Lao's Central purpose in order to confuse the public, intimidate the Board, and disrupt business of the Wat Lao corporation.

Wat Lao has since been unable to carry out their mission to promote the peaceful exercise of Buddhism at its Temple in Fauquier County as a religious, non-profit, charitable organization due to its recent negative publicity caused by the defendants. The spread of fake news through the Washington Post and social media by making false allegations- without any evidence to back up their claims- toward the Temple and its monks who have been faithful and true in their work, but whose reputations have since been wrongfully tainted;

Defendants have attempted to infiltrate the corporation and the Board of Directors by conducting fraudulent "elections", fabricating a set of fake "bylaws", issuing a number of no-trespassing notices, filing multiple fraudulent documents with the VSCC, and even filing a lawsuit without any intent of following through;

They have been able to confuse authorities and police who have not been able to do their job properly due to the disorder that has been caused by the defendants;

They have been able to damage Wat Lao's reputation and inflict a great deal of doubt, confusion, and even fear in its members. This has since caused a number of long time worshippers to leave, taking with them the primary source of revenue, causing catastrophic financial damage to the Temple;

Wat Lao has since lost more than 90% of its revenue as defendants have taken over \$100,000 in donations and continue to raise funds for personal gain daily;

They have conducted several fraudulent fundraising campaigns in the name of Wat Lao and kept the money donated to Wat Lao adding up to over \$50K;

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LAMKEO SYSAVAT: See answer to interrogatory 5. In addition, the conduct constituting conspiracy as outlined in the Complaint includes but is not limited to: Defendants have been and continue to conspire and plan amongst one another and accomplices with the specific and malicious intent to damage Wat Lao in its reputation, business, and trade along with motives to create a contentious atmosphere at the Temple that is antithetical to Wat Lao's Central purpose in order to confuse the public, intimidate the Board, and disrupt business of the Wat Lao corporation.

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MIXAY PANYASITH: See answer to interrogatory 5. In addition, the conduct constituting conspiracy as outlined in the Complaint includes but is not limited to: Defendants have been and continue to conspire and plan amongst one another and accomplices with the specific and malicious intent to damage Wat Lao in its reputation, business, and trade along with motives to create a contentious atmosphere at the Temple that is antithetical to Wat Lao's Central purpose in order to confuse the public, intimidate the Board, and disrupt business of the Wat Lao corporation.

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KIMBERLY RICHARDS: See answer to interrogatory 5. In addition, the conduct constituting conspiracy as outlined in the Complaint includes but is not limited to: Defendants have been and continue to conspire and plan amongst one another and accomplices with the specific and malicious intent to damage Wat Lao in its reputation, business, and trade along with motives to create a contentious atmosphere at the

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Photographic, Video and published evidence of defendant conducting the wrongful activities. Specific documentary evidence is included with the Plaintiff's response to the Defendants' Request for Production of Documents. For example, Watt Sengkhyavong admitted this conspiracy on Oct 8th, 2019 on Facebook.

- 9) Identify each and every **“false allegation”** made as described in Paragraph 16. For each such “false allegation,” identify the specific person who made the “false allegation,” the specific “false allegation” made, and the date, time, and location (Internet, temple, other place) where the “false allegation” was made.

ANSWER:

Please refer to materials included in the Plaintiff's Response to Request for Documents, electronic folder 4.

“They accused the Vice Abbott Phonexay Mingsisouphanh (who goes by multiple names, including The Venerable Chandaphone Chakkavarro, Achan Chandra, Achan Chanda and other variations) and Ilene Tognini, a licensed attorney of misspending the temple's

funds in numerous ways — paying for Tognini’s home in Florida, transferring money to a personal acquaintance of Mingsisouphanh and more unproven allegations.”

– Jan 6 2020 Washington Post Article based on interview with Defendants including Mixay Panyasith

“The people were looking for someone to take care of the temple who they can trust. [Ilene Tognini] right down took advantage of the innocent people. We don’t need this kind of person to be in our community.” – Cristina Antonio on change.org

“If we lose then [Ilene Tognini] will sell and we don’t know what the next owner will do” – Sam Lithisack Nov 19, 2019 on Facebook

"Help end the gross mismanagement, abuse of power, unethical behaviors, and wasteful spending of the Board of Directors and Officers of Wat Lao Buddhavong." - Max Mounkhaty October 8, 2019 on Facebook.

"Is ILENE TOGNINI (who is claiming to be the OWNER of the temple) acting alone? Or is it the consents of all directors including the head monks to forbid our concerned community from enter the temple?" - Watt Sengkhyavong Nov 22nd, 2019 on Facebook.

"...the WLB's Board (Red Team: Phonexay Mingsisouphanh (Achan Chanda), Ilene Marie Tognini (the lawyer), and Southalavong Boutah) somehow engineered to expel Achan Bounmy as President from the Board, unbeknownst to most people." - Watt Sengkhyavong Oct 8th, 2019 on Facebook.

"On August 26, 2019, the new Board Members and Officers were elected by Achan Bounmy and members and properly registered with the Commonwealth of Virginia State Corporation Commission (SCC). On September 23, 2019, Achan Bounmy and the Lao Community opened a new bank account for WLB with United Bank. Some donations collected from the temple's activities were deposited to the new account, although some funds are still being collected by the Red Team. " - Watt Sengkhyavong Oct 8th, 2019 on Facebook.

Change.org Petition accusing Ilene Tognini of Dereliction of Duty, Incompetence, Ethical Violations, Abuse of Power, Disregard for By-Laws and other Wat Lao Policies, Failure to provide adequate financial statements, Inappropriate taking of the loan against temple’s property, Unauthorized use of funds, Lack of transparency, and Bad business Decisions. (Link Below)

https://www.change.org/p/mrs-ilene-marie-tognini-director-treasurer-petition-demanding-bad-director-treasurer-mrs-ilene-marie-tognini-to-resign-from-temple?recruiter=854694147&utm_source=share_petition&utm_medium=facebook&utm_campaign=psf_combo_share_initial&utm_term=psf_combo_share_abi&recruited_by=id=35bbd9e0-0b9b-11e8-9a66-311be2fbae9a&share_bandit_exp=initial-18722762-en-US&share_bandit_var=v1&utm_content=fht-18722762-en-us%3Av2

“As most of us know we are in great danger of losing our Temple to corruption. Everyone who has loved ones ashes there will also lose their resting place once Mrs.

Ilene Marie Tognini sells the temple the new buyers will have everything removed, all loved ones ashes, religious statues and all. As well as all money that was raised by us in the past has been also used to help this. We cannot allow her and the others who helped to get away with this.” – Sam Lithisack Nov 19, 2019 on Facebook.

"Why would a lawyer from California want to own a non-profit temple? What board of directors gave her the power? Everything since her power has been corrupt. So sad that the trust and funds of the supporters was abused and misused." -Kimberly Lithisack Nov 16,2019 on change.org

10) Explain in detail the “fraudulent scheme” that you allege in Paragraph 21, including the alleged purpose of that scheme, all acts in furtherance of the scheme, including the person who perpetrated that act, and the time, date, and place of the act, and each person you claim that relied upon the act and was injured thereby.

ANSWER:

The fraudulent scheme referred to in paragraph 21 of the complaint was described extensively throughout the Complaint. The purpose of the scheme was to take control of Wat Lao, take the money that was donated to Wat Lao, and oust the current board members. In addition:

In October of 2019, a fraudulent fundraiser was started on Facebook by Watt Sengkhyavong and Max Mounkhaty impersonating Wat Lao temple and asking for donations. This campaign eventually raised over \$50,000 dollars.

In a signed affidavit, Sisomphanh Sanginthirath, who is a current member of the Wat Lao Board of Directors, claims that he has personal knowledge that an amount approximately equal to \$37,309 was collected by Defendants in the name of Plaintiff but not delivered to Plaintiff for deposit into the Wat Lao bank account.

11) Identify in detail each and every fact that supports your contention in Paragraph 33 that “Defendant [Sayithsena] acted with actual knowledge that the fake “bylaws” they had drafted were in fact not the true Bylaws of the Corporation.”

ANSWER:

Defendant was in possession of the signed articles of incorporation and had complete access to the legitimate bylaws of Wat Lao Buddhavong. The fake bylaws put forth by Defendant had not been signed by any director or official at Wat Lao Buddhavong. Significantly, Sayithsena led a similar attack against the leadership of Plaintiff from 2006 to 2009. As part of those efforts, Sayithsena recruited a small group of other congregants to "re-write" the bylaws without authority. Sayithsena and the other Defendants have first hand knowledge that the fake bylaws he put forth were not the true bylaws of Plaintiff.

12) For each Count, please identify the specific amount of damages you allege that you specifically incurred because of Defendant Sayasithsena's alleged actions and how Defendant Sayasithsena's alleged actions allegedly caused that damage.

ANSWER:

All defendants are jointly and severally responsible for all of the damages incurred by Plaintiff as described in each count of the complaint, totaling \$1,250,000.00.

13) Identify in detail every fact that supports your assertion exactly how "[t]he conduct of Defendants is ongoing [and] threatens to do irreparable harm to Wat Lao" and specifically which of this alleged conduct is being engaged in by Defendant Sayasithsena.

ANSWER:

1. The Lao Global Heritage Alliance, that formerly raised money fraudulently by impersonating Wat Lao, is continuing to raise money under the new moniker through PayPal and GoFundMe.

2. The Defendants are still demanding the resignation of The Venerable Achan Dr. Phonexay Mingsisouphanh and Ilene Tognini on libelous grounds through the change.org petition and on various social media websites.

3. Through extensive social media platforms the defendants continue to publish fabricated allegations and personal attacks on libelous grounds against the individual members of the Wat Lao Board of Directors, including imputing their professions, their family members and their deceased relatives.

4. The Defendants continue to aggressively discourage the public and the community from supporting, volunteering or participating in events at the Temple. The defendant is actively preventing the Plaintiff from continuing its normal operations.

14) For each Count, please identify the specific amount of damages you allege that you specifically incurred because of Defendant Sayasithsena's alleged actions and how Defendant Sayasithsena's alleged actions caused that damage.

ANSWER:

Count 1: By spreading harmful and false information in reference to the temple and its board of directors in a coordinated manner, the defendants, including Sayasithsena, have committed conspiracy under Virginia Code 18.2-499 and -500. This has resulted in the loss of hundreds of thousands of dollars in revenue. This loss continues.

Count 2: Due to the conduct of the defendants, Wat Lao has lost nearly all of its revenue since September 2019, totaling over \$200,000. In a Facebook post dated 1/15/2020, Watt Sengkhyavong himself claims that the defendants themselves caused large numbers of usual temple goers to stop coming to the Temple. These Temple goers are the source of the donations that provide Plaintiff with most of its income.

Count 3: In a signed affidavit, Sisomphanh Sanginthirath, who is a current member of the Wat Lao Board of Directors, claims that he has personal knowledge that an amount about or equal to \$37,309 was collected by Defendants in the name of Plaintiff but not delivered to Plaintiff for deposit into the Wat Lao bank account. Tampering with temple donations in this way is also evidenced through photos and videos.

15) Identify in detail each and every allegation from the lawsuit described in Paragraph 52 that you contend in Paragraph 53 was “utterly false” and all facts that support your contention that each allegation was false.

ANSWER:

1. Breach of Fiduciary Duties

The lawsuit described in Paragraph 52 of the complaint is utterly false in its allegation that the Directors breached their duty to abide by the Articles of Incorporations and mismanaged corporate funds for their own personal gains. The 2019 PBMares audit of Plaintiff corporation supports this contention.

2. Unjust Enrichment

The lawsuit described in Paragraph 52 of the complaint is utterly false in its allegation that the Directors siphoned funds from the donation box and the corporate funds of Wat Lao US and diverted the same to their personal accounts. This is disproved in the 2019 PBMares audit of Plaintiff.

3. Fraud

The lawsuit described in Paragraph 52 of the complaint is utterly false in its allegation that the defendants in that suit falsely represented that they were acting in the best interests of Wat Lao while performing actions on behalf of the Wat Lao and while acting for the Venerable Bounmy Kittidhammano. There is no evidence that exists to support this allegation.

4. Writ of Mandamus

The lawsuit described in Paragraph 52 of the complaint is utterly false in its allegation that the plaintiff of said lawsuit is entitled to corporate records of Wat Lao Buddhavong. The plaintiff of said lawsuit claimed fraudulently that they were the Board of Directors for Wat Lao. This is not true, and thus they are not entitled to the records.

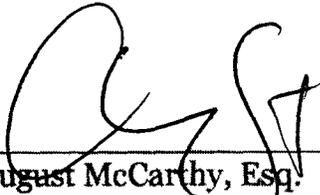
5. Conversion

The lawsuit described in Paragraph 52 of the complaint is utterly false in its allegation that the defendants unlawfully converted temple funds for their own personal

use. There is no evidence to support this allegation and substantial evidence to disprove it.

Respectfully submitted,
WAT LAO BUDDHAVONG, INC.

By counsel:



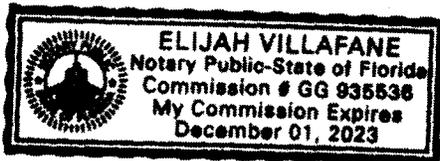
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CERTIFICATE

I certify under penalty of perjury that the foregoing answers are true and accurate to the best of my knowledge.



Rene Tognini
Board of Directors and authorized agent for
Plaintiff



On 7/10/20 Rene Tognini appeared before me and is personally known to me and subscribed the foregoing document under oath.
CERTIFICATE OF SERVICE

I certify that on this 10th day of July, 2020, a copy of the foregoing was served via electronic mail and facsimile to:

Thomas F. Urban II
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
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703-812-0462
703-812-0486 fax
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And a copy of this Certificate was faxed to:

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debywater@tatebywater.com
Counsel for remaining defendants



August McCarthy