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9 Attorneys for Plaintiffs
Anaheim Japanese Free Methodist Church
10 And Debra Chiya

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF ORANGE**
13 **NORTH JUSTICE CENTER**
14

15 ANAHEIM JAPANESE FREE
16 METHODIST CHURCH, a California
Nonprofit Religious Corporation, DEBRA
17 CHIYA, member, board member and
corporate treasurer;

18 Plaintiffs,

19 vs.

20 THE VOICE CHURCH OF ORANGE
21 COUNTY, INC., a California Nonprofit
Religious Corporation, TAKA IGUCHI, as
22 an individual and officer; PACIFIC
COAST JAPANESE CONFERENCE OF
23 FREE METHODIST CHURCH OF
NORTH AMERICA, a California
24 Nonprofit Religious Corporation; and
DOES 1 through 50, inclusive,

25 Defendants.
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**CASE NO.30-2023-01322048-CU-PP-
NJC**

**DECLARATION OF ERIC IKEDA IN
SUPPORT OF APPLICATION FOR
TEMPORARY RESTRAINING
ORDER**

1 I, ERIC IKEDA, declare as follows:

2 1. I am an adult and I have personal knowledge of the facts set forth herein, and
3 if called as a witness, I could and would competently testify thereto, as to those facts which
4 I declare on information and belief, I believe them to be true.

5 2. I am a member of the Anaheim Japanese Free Methodist Church a California
6 Nonprofit Religious Corporation, also known as Anaheim Free Methodist Church (AFMC)
7 from the year 1987 to the present. I make this declaration in support of the Plaintiffs'
8 Application for Temporary Restraining Order.

9 3. On April 20, 2023, the AFMC's Board of Directors sent out a 10-day notice
10 for a meeting of the church membership at a "society" meeting.

11 4. On April 30, 2023, at 1:30 p.m., the AFMC's church membership met at the
12 Main Chapel of the Anaheim Free Methodist Church as a "society" and as members of the
13 AFMC corporate entity. ("April 30th Corporate Membership Meeting")

14 5. The purpose of the April 30th Corporate Membership Meeting was to give
15 church members the opportunity to consider the announced actions of the Pacific Coast
16 Japanese Conference ("PCJC") to restructure AFMC and change its name as expressed by
17 Superintendent Keith Tanita to church members on March 12, 2023, and confirmed in
18 writing on or about April 15, 2023.

19 6. At the April 30th Corporate Membership Meeting, in the absence of the lead
20 pastor, I was elected to chair the meeting. I presided over the meeting and have personal
21 knowledge of the motions that were made, seconded and voted on by the membership. A
22 secretary was elected and tellers were elected. I have presided over previous assemblies
23 and have experience with and knowledge of the Robert's Rules of Order.

24 7. At the April 30th Corporate Membership Meeting, ballots were given to only
25 active members who signed at the credentialing table. The list of active members was
26 previously prepared by the Pastor and staff and published in the annual report of 2022.

27 8. At the April 30th Corporate Membership Meeting, two resolutions were
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1 voted on by active members of the church. The first resolution was: “ ‘Anaheim Free
2 Methodist Church’ Shall Keep Its Current Name. I reported the tally of the ballots by the
3 elected tellers: the active membership voted 128 “yes,” 0 “no,” 1 abstention.

4 9. The second resolution was “Anaheim Japanese Free Methodist Church Shall
5 Remain an Independent Nonprofit Religious Corporation That is Operated Separately from
6 Voice Church of Orange County, Inc.” I reported the tally of the secret ballots by the
7 elected tellers: the active membership voted 128 “yes,” 0 “no,” 1 abstention.

8 I declare under penalty of perjury that the foregoing is true and correct.

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Executed on this 30th day of April, 2023 in La Habra Heights, California.



Eric Ikeda