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15 Attorneys for Plaintiffs
16 Anaheim Japanese Free Methodist Church
17 And Debra Chiya

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE
NORTH JUSTICE CENTER

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

20 Plaintiffs,

21 vs.

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

Defendants.

CASE NO.30-2023-01322048-CU-PP-NJC

**DECLARATION OF DEBRA CHIYA
IN SUPPORT OF APPLICATION FOR
TEMPORARY RESTRAINING
ORDER**

1 I, DEBRA CHIYA, 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 the duly elected Treasurer of the Anaheim Japanese Free Methodist
6 Church a California Nonprofit Religious Corporation, also known as Anaheim Free
7 Methodist Church (AFMC) from the year 2002 to the present. I make this declaration in
8 support of the Plaintiffs' Application for Temporary Restraining Order.

9 3. Since 2002, as the Treasurer, I have personal knowledge of how the financial
10 business of the AMFC is managed, including, the creation of budgets by the local AFMC
11 Board, approval of budgets by the Society membership, management of bank accounts,
12 payroll of employees, payment of building maintenance and repair, payment of real estate
13 taxes and payroll taxes, and health insurance.

14 4. The Anaheim Japanese Free Methodist Church has a separate Employer Tax
15 Identification Number (EIN) for payment of payroll taxes in its corporate name.

16 5. Since 2002, I have been listed as the corporate treasurer with the California
17 Secretary of State's annual information statement. Officers of the local Board have been
18 listed as the corporate officers with the State of California. [A true and correct copy of the
19 May 28, 2020 and most recent statement of information are attached as (Exhibit 1 & 2).]

20 6. Since 2002, the Pacific Coast Japanese Conference has never approved any
21 of the AFMC's financial business, itemized above. All business, including the bank
22 accounts have been managed under the local church's Board of Directors, and members.

23 7. AFMC has consistently paid for the support of Pacific Coast Japanese
24 Conference by paying the Conference a stated percentage of monthly donations, currently
25 set at six-point-eight-percent (6.8%) of the donations received from members of the
26 AMFC.

27 8. From my personal experience, the Pacific Coast Japanese Conference
28

1 appoints the lead pastor to AFMC, however, the local Board of AFMC approves the salary,
2 and is responsible for payment of pastoral benefits including life, and disability insurance
3 premiums, medical, dental and vision insurance, pension contributions to a plan managed
4 by the Free Methodist Church of North America.

5 9. From my personal experience, in over twenty (20) years, the Pacific Coast
6 Japanese Conference has never asserted the power to act as the Board of Directors for the
7 Anaheim Japanese Free Methodist Church, a California nonprofit corporation, and it has
8 never acted as the Board of Directors of AFMC.

9 10. I was told by the recently appointed pastor that I was being fired effective
10 April 30, 2023, and I was directed to hand over control of the AFMC bank accounts and
11 financial records to the Voice Church of Orange County, Inc.'s personnel and third-party
12 bookkeeping vendors.

13 11. On Friday April 28, 2023, I received a copy of a letter from the PCJC's
14 attorney Brad Greenman from the Tyler Law LLP law firm, stating that I was in breach of
15 trust to the Conference if I did not turn over control of the AFMC bank accounts to the
16 Voice Church of Orange County, Inc.

17 12. I request that the Court place a hold on any changes that have been
18 communicated to me by PCJC and Voice Church of Orange County, Inc. until this Court
19 can declare what is legal. I want to follow the lawful process.

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

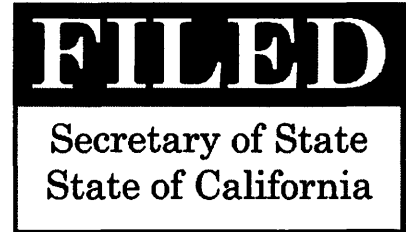
21
22 Executed on this 30th day of April, 2023 in Huntington Beach, California.

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26 _____
27 Debra Chiya
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Exhibit “1”



**California Secretary of State
Electronic Filing**



Corporation - Statement of Information

Entity Name: ANAHEIM JAPANESE FREE METHODIST CHURCH

Entity (File) Number: C0399388

File Date: 05/28/2020

Entity Type: Corporation

Jurisdiction: CALIFORNIA

Document ID: GF89670

Detailed Filing Information

1. **Entity Name:** ANAHEIM JAPANESE FREE METHODIST CHURCH

2. **Business Addresses:**
 - a. **Street Address of Principal Office in California:** 1001 N. MAYFLOWER STREET
ANAHEIM, California 92801
United States of America

 - b. **Mailing Address:** 1001 N. MAYFLOWER STREET
ANAHEIM, California 92801
United States of America

3. **Officers:**
 - a. **Chief Executive Officer:** KEVIN WONG
1001 N. MAYFLOWER STREET
ANAHEIM, California 92801
United States of America

 - b. **Secretary:** JENNIE KAIHARA
1001 N. MAYFLOWER STREET
ANAHEIM, California 92801
United States of America

Document ID: GF89670



California Secretary of State Electronic Filing

Officers (Cont'd):

c. Chief Financial Officer:

DEBRA CHIYA
1001 N. MAYFLOWER STREET
ANAHEIM, California 92801
United States of America

4. Agent for Service of Process:

KEVIN WONG
1001 N. MAYFLOWER STREET
ANAHEIM, California 92801
United States of America

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature: Debra N Chiya

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: GF89670

Exhibit “2”



BA20230642171



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
CA NONPROFIT CORPORATION
 California Secretary of State
 1500 11th Street
 Sacramento, California 95814
 (916) 653-3516

For Office Use Only
-FILED-
 File No.: BA20230642171
 Date Filed: 4/18/2023

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Entity Details			
Corporation Name	ANAHEIM JAPANESE FREE METHODIST CHURCH		
Entity No.	0399388		
Formed In	CALIFORNIA		
Street Address of California Principal Office of Corporation			
Street Address of California Office	None		
Mailing Address of Corporation			
Mailing Address	1001 N. MAYFLOWER STREET ANAHEIM, CA 92801		
Attention			
Officers			
Officer Name	Officer Address	Position(s)	
KEVIN WONG	1001 N. MAYFLOWER STREET ANAHEIM, CA 92801	Chief Executive Officer	
JENNIE KAIHARA	1001 N. MAYFLOWER STREET ANAHEIM, CA 92801	Secretary	
DEBRA CHIYA	1001 N. MAYFLOWER STREET ANAHEIM, CA 92801	Chief Financial Officer	
Additional Officers			
Officer Name	Officer Address	Position	Stated Position
None Entered			
Agent for Service of Process			
Agent Name	KEVIN WONG		
Agent Address	1001 N. MAYFLOWER STREET ANAHEIM, CA 92801		
Email Notifications			
Opt-in Email Notifications	No, I do NOT want to receive entity notifications via email. I prefer notifications by USPS mail.		
Electronic Signature			
<input checked="" type="checkbox"/> By signing, I affirm that the information herein is true and correct and that I am authorized by California law to sign.			
<i>Debra N Chiya</i>	<i>04/18/2023</i>		
Signature	Date		