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8 **BEFORE THE**
9 **ATTORNEY GENERAL**
10 **STATE OF CALIFORNIA**

13 **In the Matter of the Order to Cease and
Desist and Assessment of Penalties Against:**

- 14 1. **ARIS ANAGNOS CHARITABLE TRUST (CT0268301);**
- 15 2. **ARIS AND CAROLYN ANAGNOS PEACE CENTER FOUNDATION
16 AKA ARIS ANAGNOS FOUNDATION (CT0161064);**
- 17 3. **DEMOS ANAGNOS.**
- 18 4. **CAROL ANAGNOS**
- 19 5. **JEAN PAUL ANAGNOS**
- 20 6. **ARIS JAMES ANAGNOS**

22 Respondents.

Case No. 2020-CT0268301

- 21 1. **ORDER TO CEASE AND DESIST;**
- 22 2. **NOTICE OF WITHDRAWAL OF
23 WAIVER TO DISSOLUTION.**

24 1. **TO THE ARIS ANAGNOS CHARITABLE TRUST (CT0268301); ARIS
25 AND CAROLYN ANAGNOS PEACE CENTER FOUNDATION AKA ARIS ANAGNOS
26 FOUNDATION (CT0161064); DEMOS ANAGNOS, CAROL ANAGNOS, JEAN PAUL
27 ANAGNOS and ARIS JAMES ANAGNOS:**

1 13. John Lafferty was a director of the Foundation until 2018. John Lafferty was also
2 a director of the Office of the Americas and the National Lawyers Guild, charities supported by
3 the Foundation.

4 14. Bonpane and Lafferty confirmed that the Foundation's primary activity to fulfill its
5 purpose was to use the Peace Center to provide rent-free office, meeting and conference room
6 space to peace and justice charities in perpetuity.

7 15. In 2018, the existing board of directors, including Demos Anagnos, Aris Anagnos,
8 Lydia Brazon, Jim Lafferty and Theresa Bonpane, unanimously passed a motion confirming the
9 existing restrictions on the Peace Center building. The motion stated that if and when the
10 ACAPCF became a family or private foundation, the current social justice tenants at the Peace
11 Center would be entitled to stay at the building for as long as they wish and that they would be
12 able to do so rent-free. The Attorney General requested a copy of records from the Foundation,
13 including the minutes reflecting this motion. Respondents failed to produce any records and
14 claimed that the records had been lost.

15 16. For these reasons, the Peace Center building is impressed with a charitable trust
16 and is a restricted charitable asset and cannot be used or transferred in a way that is inconsistent
17 with the purpose for which it was donated.

18 17. Respondents are attempting to sell the Peace Center building and have instructed
19 all of the charities that are currently using the building to vacate the premises. The proposed sale
20 of the Peace Center is inconsistent with the charitable trust to which it is subject.

21 18. Respondents purported to dissolve the Aris Anagnos Foundation and transfer its
22 assets to the Aris Anagnos Trust. The decision to dissolve the Foundation was invalid. The
23 directors of the Foundation were all either the spouse or children of Demos Anagnos. As a result,
24 the board was composed of more than 49% of "interested persons" in violation of Corporations
25 Code section 5227. The Foundation had no disinterested directors involved in the decision.

26 19. As the Peace Center constituted the entire charitable purpose of the Foundation,
27 the directors failed to act in the best interests of the Foundation in deciding to sell the Peace
28

1 Center building. The directors also failed to act in the best interests of the Foundation in deciding
2 to dissolve the Foundation and transfer its assets to the Aris Anagnos Trust.

3 20. Respondents failed to disclose the sale of the Peace Center building in their request
4 for a dissolution waiver to the Attorney General. Instead, Respondents made it appear that the
5 change was simply in the form of the charity and that it would continue its existing charitable
6 programs. By failing to provide material information to the Attorney General and failing to act in
7 the best interests of the Foundation, Respondents have breached their fiduciary duties and
8 violated the charitable trust to which the Peace Center is subject.

9 **BACKGROUND OF THE ARIS AND CAROLYN ANAGNOS**

10 **PEACE CENTER FOUNDATION**

11 21. In or around 1989, Aris Anagnos purchased a building at 8124 W. Third Street,
12 Los Angeles, CA 90048. In 2007, the building was donated to the Aris and Carolyn Anagnos
13 Peace Center Foundation. The building was known as the “Peace Center” and provided free
14 office space to organizations supporting peace and justice. The building was later sold and the
15 proceeds were used to purchase a building at 3916 Sepulveda Boulevard in Culver City,
16 California.

17 22. The Aris and Carolyn Anagnos Peace Center Foundation was incorporated in
18 California as a nonprofit public benefit corporation on December 21, 2008. According to the
19 Articles of Incorporation, it was “organized and operated exclusively for the benefit of, to
20 perform the functions of, and to carry out the purposes of, Office of the Americas, a California
21 nonprofit corporation, and shall be operated, supervised, or controlled by Office of the
22 Americas.”

23 23. The Foundation’s bylaws state it is a “Supporting Organization”:

24 The corporation is a supporting organization and shall be operated, supervised, or
25 controlled by Office of the Americas, a California nonprofit corporation, within the
26 meaning of Internal Revenue Code Section 509(a)(3)(B) and the regulations
27 promulgated thereunder. The specific purposes of the corporation are to conduct or
28 support activities for the benefit of, to perform the functions of, or to carry out the
purposes of Office of the Americas and to such other publicly supported charities to
which the Office of the Americas provides assistance. The corporation is not
empowered to engage in activities which are not in furtherance of these purposes.

1 24. The Foundation's bylaws further provide that there shall be five directors, three of
2 whom are appointed by Office of the Americas and two of whom shall consist of "Donor
3 Directors" appointed by Aris Anagnos. The bylaws required that "the number of Donor Directors
4 who may at any time be serving as Donor Directors shall be and remain at least one less than the
5 number of Office of the Americas Directors then serving in office."

6 25. The bylaws expressly prohibited the board to be controlled by "disqualified
7 persons":

8 At no time shall the Board of Directors of the corporation be constituted so as to be
9 controlled, directly or indirectly, by one or more disqualified persons with respect to
10 the corporation (as defined in Section 4946 of the Internal Revenue Code) other than
11 "foundation managers" as defined by the Internal Revenue Code and other than one
or more organizations described in Sections 509(a)(1) or 509(a)(2) of the Internal
Revenue Code.

12 26. Both the bylaws and Corporations Code section 5227 prohibited more than 49% of
13 the board to be made of "interested persons". Demos Anagnos, Carol Anagnos, Jean Paul
14 Anagnos and Aris James Anagnos are all interested persons within the meaning of Corporations
15 Code section 5227.

16 27. In its application for tax exempt status to the Internal Revenue Service (IRS Form
17 1023), the Foundation described its activities under penalty of perjury on July 7, 2008, as follows:

18 The Applicant will achieve its exempt purpose by providing financial and
19 administrative support to the Office of the Americas and to such other entities that
20 Office of the Americas supports that have peace and justice as their principal purpose
and which are tax-exempt public charities pursuant to Code Sections 501(c)(3) and
509(a)(1) or (a)(2).

21 28. In the IRS Form 1023, the Foundation also identified its specific activities under
22 penalty of perjury as:

23 The Applicant's charitable purpose is to provide funding for entities that promote
24 peace and justice. Providing funding, services, and facilities to support the Office of
25 the Americas (and to other public charities that the Office of the Americas supports
that are exempt from tax pursuant to Code Sections 501(c)(3) and 509(a)(1) or (a)(2))
will further the Applicant's charitable purpose.

26 As indicated in the financial statements included with this application, the Applicant
27 currently owns an office building in Los Angeles. The building's appraised value is
28 \$6.25 million. The Applicant has entered into negotiations to sell this building and
purchase a replacement building for approximately \$4.8 million. Rent free office
space in the replacement building will be provided to the Office of the Americas (and

1 to a small number of other peace and justice entities that Office of the Americas
2 supports). The remaining funds (i.e. after the sale of the building that the Applicant
3 currently owns and the purchase of the replacement building) will be used as an
4 endowment by the Applicant. The income from this endowment will be used to
maintain the replacement building. The surplus will be distributed to the Office of the
Americas (and other peace and justice entities that Office of the Americas supports).

5 29. The IRS Form 1023 also acknowledged that both Aris Anagnos and Demos
6 Anagnos were "disqualified persons" within the definition of Internal Revenue Code section 4946
7 and as a result, at least 60% of the board was required to be made up of persons who were not
8 disqualified.

9 30. On May 7, 2009, the articles were amended to state:

10 This corporation shall be organized and operated exclusively for the benefit of, to
11 perform the functions of, and to carry out the purposes of, Office of the Americas, a
12 California nonprofit corporation, and such other entities that have peace and justice as
a charitable purpose. This corporation shall be operated, supervised or controlled by
Office of the Americas.

13 31. The Foundation's application for registration with the Registry (Form CT-1), was
14 signed under penalty of perjury by Aris Anagnos on March 23, 2010. The application stated:

15 The organization is organized and operated exclusively for the benefit of, to perform
16 the functions of, and to carry out the purposes of, Offices of the Americas, a
17 California nonprofit corporation, and such other entities that have peace and justice as
a charitable purpose. The organization shall be operated, supervised, or controlled by
Office of Americas.

18 32. On June 28, 2018, the Foundation's articles of incorporation were restated. The
19 restated articles were signed by Demos Anagnos, as President and Carol Anagnos, as Secretary.
20 Article II was amended to state the organization's charitable purposes as:

21 The specific purpose of this corporation shall be to promote and support world peace
22 and social justice, and to carry on other charitable, educational, religious, scientific,
and educational activity as allowed by law.

23 33. The decision to amend the Foundation's articles was invalid. The directors of the
24 Foundation were all either the spouse or children of Demos Anagnos. As a result, the board was
25 in violation of Corporations Code section 5227.

26 34. Even if the amendment was valid, it could not alter or remove the restrictions
27 imposed on assets impressed with a charitable trust prior to the amendment, including the Peace
28 Center building.

1 35. Aris Anagnos died on July 23, 2018.

2 36. On April 15, 2019, Demos Anagnos, as President, and Carol Anagnos, as
3 Secretary, purported to change the name of the Foundation to the Aris Anagnos Foundation.

4 **THE FOUNDATION'S PRIMARY PURPOSE WAS OPERATING THE PEACE**
5 **CENTER AND CONSTITUTED ALL OF ITS CHARITABLE ACTIVITIES**

6 37. From the inception of the Foundation to Aris Anagnos' death, the Foundation
7 existed solely to support charities dedicated to peace and justice by operation of the Peace Center.
8 Throughout this time the Foundation had no charitable programs other than the operation of the
9 Peace Center. This is consistent with the annual reports it filed under penalty of perjury with the
10 Attorney General, including copies of its IRS Form 990. From 2008 through 2018, the
11 Foundation consistently reported:

- 12 a. The primary exempt purpose of the Foundation was to "provide financial
13 and administrative support to the Office of Americas, a 501 C 3
14 organization."
15 b. Virtually all of the Foundation's assets consisted of the real property donated
16 by Aris Anagnos on December 26, 2007, known as the Peace Center.
17 c. The Foundation reported that its sole charitable program was to provide
18 financial support to the Offices of the Americas, which it did through the
19 Peace Center. The Foundation had no other charitable programs. Virtually
20 all of the expenditures for charitable programs were either the depreciation
21 of the building or property taxes.

22 38. The Foundation's description of its primary program service accomplishment for
23 each year was substantially similar to the following:

24 The Aris and Carolyn Anagnos Peace Center (The Peace Center) is operated to
25 provide financial and administrative support to Office of the Americas a 501(c)(3)
26 organization. In addition approximately twenty other nonprofit organizations occupy
space rent free in the building owned by the Peace Center. Other nonprofit and
community organizations use space without charge for meetings and conferences..

- 27 a. In response to Part IV, Section A, Line 6 requesting a description of grants
28 or provided benefits to others, the Foundation's typical response stated:

1 The Aris and Carol Anagnos Peace Center Foundation (ACAPCF) provided free
2 office space for approximately 20 nonprofit corporations. Other nonprofit and
3 community organizations use space without charge for meetings and conferences.
These organizations function the realm of peace and justice and therefore support
ACAPCF's exempt purpose.

4 b. The Foundation provided the same response to Part IV, Section B, Line 2
5 requesting a description of how the Foundation carried out its purpose by
6 providing benefit to organizations other than the supported organization.

7 **RESPONDENTS ATTEMPTS TO DISSOLVE THE FOUNDATION, SELL THE PEACE**
8 **CENTER BUILDING AND TRANSFER THE ASSETS TO A TRUST CONTROLLED BY**
9 **DEMOS ANAGNOS ARE IMPROPER**

10 39. In or around May 2018, Demos Anagnos sought to replace all of the independent
11 directors with his family members in violation of the Foundation's articles, bylaws and California
12 law. The existing board agreed to step down on the condition that the board ratify the restrictions
13 on the Peace Center building. The board unanimously passed a motion confirming the existing
14 restrictions on the Peace Center building. The motion stated that if and when the Foundation
15 became a family or private foundation, the current social justice tenants at the Peace Center
16 would be entitled to stay at the building for as long as they wish and do so rent-free.

17 40. The directors were then replaced with Demos Anagnos' family. Carol Anagnos is
18 the wife of Demos Anagnos. Jean Paul Anagnos and Aris James Anagnos are the sons of Demos
19 Anagnos. Members of the Anagnos family were "disqualified persons" within the meaning of
20 Internal Revenue Code section 4946. This violated the Foundation's representation in its IRS
21 Form 1023 that at least 60% of the board were not disqualified. Further, the board composition
22 was in violation of Corporations Code section 5227.

23 41. On June 28, 2018, the new board purported to restate the Foundation's articles of
24 incorporation. The restated articles were signed by Demos Anagnos, as President, and Carol
25 Anagnos, as Secretary. Article II was amended to state the organization's charitable purposes as:

26 The specific purpose of this corporation shall be to promote and support world peace
27 and social justice, and to carry on other charitable, educational, religious, scientific,
and educational activity as allowed by law.

1 42. The decision to amend the Foundation's articles was invalid. The directors were
2 all either the spouse or children of Demos Anagnos.

3 43. Aris Anagnos died on July 23, 2018.

4 44. On April 15, 2019, the board purported to restate the articles of incorporation and
5 change the name of the Foundation to the Aris Anagnos Foundation. The restated articles were
6 signed by Demos Anagnos, as President, and Carol Anagnos, as Secretary. The directors of the
7 Foundation were all either the spouse or children of Demos Anagnos. As a result, the board was
8 in violation of Corporations Code section 5227.

9 45. On or about November 22, 2019, Demos Anagnos created the Aris Anagnos
10 Charitable Trust and funded it with \$1,000. Demos Anagnos is the sole trustee of the trust.

11 46. On December 16, 2019, Demos Anagnos submitted an application for registration
12 of the Aris Anagnos Charitable Trusts with the Registry. Demos Anagnos identified himself as
13 the sole trustee and stated that the trust initially received assets on December 5, 2019.

14 47. On or about June 26, 2020, Demos Anagnos delivered to occupants of the Peace
15 Center a letter on the letterhead of the Law Offices of Demos P. Anagnos, Serious Personal
16 Injury, 3916 Sepulveda Blvd., Suite 106, Culver City, CA 90230. The letter said that the
17 Foundation will be selling the building. "If you are a tenant, your lease or month to month
18 tenancy will run with the building. If you are one of many guests who were here at the invitation
19 of my beloved father, I would urge you to start making arrangements immediately."

20 48. The Foundation did not provide notice of the sale to the Attorney General.

21 49. Charitable corporations must give notice to the Attorney General prior to
22 dissolution. (See, e.g., Corp. Code, § 6611, e. seq.; Cal. Code Regs., tit. 11, § 999.2, subd. (e).)
23 A dissolving charitable corporation must obtain approval by the court to dispose of its assets
24 unless the Attorney General issues a written waiver of objections. (Corp. Code, § 6716.) The
25 notice must provide the Attorney General sufficient information to enable the Attorney General
26 to review and evaluate the proposed action. (Cal. Code Regs., tit. 11, § 999.1 and 999.2.)

27 50. On July 9, 2020, Respondents Demos Anagnos, Carol Anagnos, Jean Paul
28 Anagnos and Aris James Anagnos purported to vote to dissolve the Aris Anagnos Foundation and

1 transfer its assets to the Aris Anagnos Trust. The decision to dissolve the Foundation was invalid.
2 The directors were all either the spouse or children of Demos Anagnos. As a result, the board
3 was in violation of Corporations Code section 5227.

4 51. On July 10, 2020, the Aris Nanos Foundation submitted a request to the Attorney
5 General for waiver of objections to the dissolution of the Aris Anagnos Foundation. The
6 Foundation requested permission to transfer all of its remaining assets to the Aris Anagnos
7 Charitable Trust.

8 52. At the time of the dissolution request, the directors of the Aris Anagnos
9 Foundation were Demos Anagnos, Carol Anagnos, Jean Paul Anagnos and Aris James Anagnos.
10 Demos Anagnos is the sole trustee of the Aris Anagnos Charitable Trust.

11 53. The notice stated that no substantial changes had occurred in the Foundation's
12 financial position since its last accounting period, ending May 31, 2019.

13 54. The notice to the Attorney General failed to disclose that Respondents intended to
14 sell the Peace Center building, that there were restrictions on the charitable assets and that it
15 intended to change the primary charitable purposes for which the charitable assets were donated
16 and held. Instead, the notice advised the Attorney General that the Aris Anagnos Charitable Trust
17 was operated by the same people as the Foundation and that the same charitable purposes would
18 continue.

19 55. On July 14, 2020, the Attorney General's office issued a waiver of objections to
20 the Foundation based on the representations made by the Foundation. Had the Foundation fully
21 and completely disclosed the facts and circumstances related to the dissolution request, the
22 Attorney General would not have granted the waiver and the Foundation would have been
23 required to obtain judicial approval. Because the Attorney General's waiver of objection was
24 obtained by failing to provide the required information, omitting material information that was
25 required to be disclosed, is not in the best interests of the charity and would violate the
26 restrictions impressed on the charitable assets, the Attorney General's waiver is withdrawn.

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28

1 56. The Foundation assets, including the real property at 3916 Sepulveda Boulevard,
2 Culver City, California, were irrevocably dedicated for charitable purposes and remain impressed
3 with a charitable trust and cannot be used in a manner that is inconsistent or violates that trust.

4 57. The Attorney General finds that the proposed sale of the Peace Center is a
5 violation of the restrictions and a breach of trust.

6 **RESPONDENTS HAVE ENGAGED IN SELF-DEALING AND MADE FALSE,**
7 **MISLEADING OR INACCURATE STATEMENTS TO THE ATTORNEY GENERAL**

8 58. Pursuant to Corporations Code section 6215, officers, directors, employees or
9 agents of a corporation are jointly and severally liable for issuing reports or other documents
10 regarding the corporation that is false in any material respect if they had knowledge that the
11 information was false. Such persons are also liable for false entries in the corporation's books or
12 records and for removing or altering any information in the corporation's books or records with
13 the intent to deceive.

14 59. On or about February 21, 2019, the Foundation filed its Annual Registration
15 Renewal Fee Report (Form RRF-1) with the Registry for the fiscal year ending May 31, 2018.
16 The Form RRF-1 was submitted under penalty of perjury by Demos Anagnos, Director. Question
17 1 of Part B of the form asks whether there were any financial transactions, including contracts and
18 leases, between the organization and any officer, director or trustee. If the organization answers
19 "Yes," it must provide an attachment with a detailed information explaining its answer.
20 Respondents answered "Yes" but only disclosed information about a loan from Aris Anagnos to
21 the Foundation. Respondents failed to disclose that Demos Anagnos, Jean Paul Anagnos and
22 Aris Jean Anagnos received free office space from the Foundation.

23 60. On or about February 21, 2019, the Foundation filed its IRS Form 990 with the
24 Registry for the fiscal year ending May 31, 2018. The IRS Form 990 was submitted under
25 penalty of perjury by Demos Anagnos.

26 61. The Foundation disclosed a loan from Aris Anagnos to the Foundation. The
27 Foundation reported that the original amount of the loan was \$35,141 with a balance due of
28 \$16,411. The Foundation disclosed that the loan was not in default and there was no written

1 agreement. Aris Anagnos died in July 2018. Demos Anagnos reported in the RRF-1 that the
2 balance would be forgiven. The following year, Demos Anagnos again reported the loan from
3 Aris Anagnos to the Foundation, but the amount due on the loan ballooned from \$16,411 in 2018
4 to \$109,878. No explanation for this increase was provided and the Foundation admitted there
5 was no written agreement.

6 62. On or about December 2, 2019, the Foundation filed its IRS Form 990 with the
7 Registry for the fiscal year ending May 31, 2019. The IRS Form 990 reported in Part VII,
8 Section A that Demos Anagnos worked 8 hours a week for the Foundation but also claimed that
9 he spent 40-60 hours a week performing charitable programs for the Foundation. The program
10 service accomplishments listed were all related to the management of the building and included
11 items such as “collection of rents,” “advertising,” and “supervision of the foundations investment
12 management strategy.” The Foundation reported no investments and no investment income.

13 63. The Foundation claimed it had four independent board members. This statement
14 was false because none of the board members met the IRS definition of “independent.” All of the
15 directors of the Foundation in 2019 were Anagnos family members.

16 **GROUND FOR ISSUANCE OF THE CEASE AND DESIST ORDER**

17 64. Respondents Aris Anagnos Charitable Trust, the Aris and Carolyn Anagnos Peace
18 Center Foundation, currently known as the Aris Anagnos Foundation and Demos Anagnos have
19 committed acts that constitute a violation of the Supervision Act and its implementing
20 regulations, including:

21 65. Respondents violated Government Code section 12591.1, subdivision (b)(2) and
22 California Code of Regulations, title 11, sections 301-305 and 314, subdivision (a)(2), by making
23 material false statements in an application, statement or report required to be filed, including by
24 the omission of material information.

25 66. Respondents violated Government Code section 12591.1, subdivision (b)(1), and
26 California Code of Regulations, title 11, section 314, subdivision (a)(1), by failing to produce
27 records of the organization or to disclose information required to be disclosed.

28

1 7) Within 15 days from the date of this Order, Respondents shall provide the
2 following documents and information:

- 3 a. All records related to the donation of real property to, or purchase of real
4 property by, the Aris and Carolyn Anagnos Peace Center Foundation,
5 currently known as the Aris Anagnos Foundation;
- 6 b. All financial records of the Aris and Carolyn Anagnos Peace Center
7 Foundation, currently known as the Aris Anagnos Foundation, since January
8 1, 2018, including:
- 9 i. General Ledgers;
- 10 ii. Cash Receipts and Disbursement Journal;
- 11 iii. Statements for all bank and financial accounts, including electronic
12 payment and credit card accounts;
- 13 iv. Canceled checks for all bank accounts;
- 14 c. All financial records of the Aris Anagnos Charitable Trust, including:
- 15 i. General Ledgers;
- 16 ii. Cash Receipts and Disbursement Journal;
- 17 iii. Statements for all bank and financial accounts, including electronic
18 payment and credit card accounts;
- 19 iv. Canceled checks for all bank accounts;
- 20 d. A schedule of all grants, gifts, donations or expenditures from the Aris and
21 Carolyn Anagnos Peace Center Foundation, currently known as the Aris
22 Anagnos Foundation, since January 1, 2018, that were not directly related to
23 the operation of the Peace Center building, including a detailed explanation
24 for the expenditure and all supporting documents.
- 25 e. All minutes of the meetings of the board of directors and all documents
26 distributed or considered by members of the board in connection with such
27 meetings.
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- 1 f. A schedule of all self-dealing transactions since 2017, including use of office
2 space at the Peace Center, along with a detailed description of the
3 transaction and all supporting documents;
- 4 g. Copies of all policies related to self-dealing and conflicts of interest, along
5 with all acknowledgments by officers or directors of such policies;
- 6 h. All documents related to any attempt to convert the Aris and Carolyn
7 Anagnos Peace Center Foundation, currently known as the Aris Anagnos
8 Foundation to a private foundation or any change in its status as a public
9 charity, including all communications with the IRS;
- 10 i. A schedule of all the tenants of the Peace Center building since January 1,
11 2018. For each tenant, include the name, the unit number, the name and
12 phone number or email of the contact person for the tenant, the starting and
13 ending dates of the lease; the amount of the lease and a copy of the lease or
14 rental agreement.
- 15 i. Identify any request to lease office space, or increase the office space
16 of an existing tenant, that was not accepted. Provide a detailed
17 explanation and all supporting documentation.
- 18 ii. Identify any units that have been unoccupied at any time since
19 January 1, 2018. Provide a detailed explanation as to why the units
20 were not rented, all steps taken to rent the units and all supporting
21 documentation.
- 22 j. All documents related to the proposed sale of the Peace Center building,
23 including a detailed description of the reason for the sale, the process for
24 making the decision to sell the building, all documents related to persons and
25 or entities involved in marketing and selling the building, including the
26 listing agreement and all supporting documents.
- 27 k. Identify testamentary documents that were in existence or became effective
28 at the time of Aris Anagnos' death that included charitable bequests or

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provisions related to the Peace Center. Provide a copy of the documents, a description of whether the disposition has been implemented and all supporting records.

8) All responses shall be sent to:

Joseph N. Zimring, Deputy Attorney General
California Department of Justice
Office of the Attorney General
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
(213) 269-6563
Joseph.Zimring@doj.ca.gov

9) Failure to comply with the terms of this order constitutes disobedience or resistance to a lawful order pursuant to Government Code section 11455.10. The Attorney General may pursue a contempt sanction of violations pursuant to Government Code section 11455.20, in addition to all other remedies available to the Attorney General.

RIGHT TO APPEAL/REQUEST FOR HEARING

10) You have the opportunity to appeal this order and assessment of penalties by filing a written appeal and request for hearing within 30 calendar days of the date of this notice. Filing an appeal does not stay the effect of this order. The appeal procedures are found in California Code of Regulations, title 11, sections 999.6 through 999.8 and are available on the Attorney General’s website at: www.ag.ca.gov/charities/statutes.php.

Dated: August 28, 2020

Respectfully Submitted,

XAVIER BECERRA
Attorney General of California



DAVID ELLER, Registrar
Registry of Charitable Trusts

LA2020601923
Anagnos Cease and Desist Order.docx (Attachment).docx