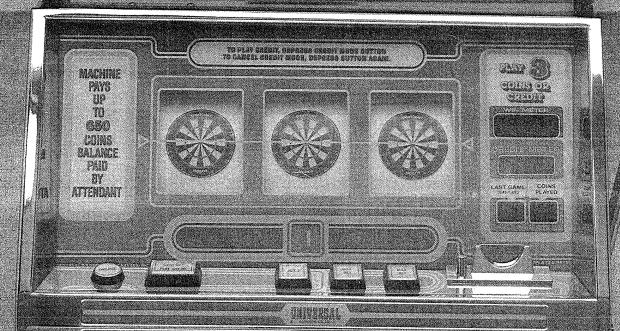
The Southern California Darts Association Presents THE TWENTY-FIRST ANNUAL

AUGUST 16-19,1990













PRICE \$2.00

1990 NODOR NORTH AMERICAN OPEN BART TOURNAMENT SCHEDULE

EVENT
"LOOSEN UP" - PRACTICE
UNITED STATES VS CANADA
ADO NATIONAL YOUTH CHAMPIONSHIP
ADO EAST-WEST ALL STAR CHALLENGE
ADO NATIONAL CHAMPIONSHIPS
PRE-REGISTRATION
MIXED 301 DOUBLES +
LADIES' CRICKET DOUBLES

TIME
11:00 AM-5:00 PM
7:30 PN
10:00 AN
10:00 AN
3:00.PN
1:00 PM - 5:00 PM
7:00 PN
10:00 AN
TAGE ++CHAN

M	OPEN CRICKET DOUBLES
M	**LADIES' 301 SINGLES +
M	**MEN'S 301 SINGLES +
M	NAODT DANCE
M	LADIES' 301 DOUBLES +
M-	OPEN 301 DOUBLES+
M	FINALS AND AWARDS PRESENTATION+
М	
MPIO	N WILL COMPETE IN WORLD MASTERS EVENTS

DATE	TIME
Sat., Aug. 18	10:00 AN
Sat., Aug. 18	3:00 PM
Sat., Aug. 18	3:00 PM
Sat., Aug. 18	9:00 PM-1:00 AN
Sun., Aug. 19	11:00 AV
Sun., Aug. 19	11:00 AV
Sun. Aug 19	5:00 PA

TOURNAMENT INFO: (213) 925-1205 or (213) 839-6972

HOTEL RESERVATIONS: 1-800-634-6666

Golden

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Unicoma Titanium Tungsten



Tournament tested in match play and before TV audiences of millions.

More people choose UNICORN than any other brand — for greater accuracy, exclusive features, consistent performance and total reliability.

unicorn® The Big Name in Darts®

EXHIBIT P

Southern California Darts Association & North American Darts Supply proudly present the 28th Annual

\$45,000+

SPORTCRAFT. 2/2 unicorn.

August 14-17, 1997 • Las Vegas, Nevada

ADO All Star "Welcome Party"	Thurs., Aug. 14	7:00 р.м.
ADO National Youth Championship	Fri., Aug. 15	9:00 A.M.
ADO East-West All Star Challenge	Fri., Aug. 15	9:00 a.m.
ADO National Championships	Fri., Aug. 15	2:00 р.м.



EVENT	SCHEDULE	FEE	1ST	2ND	T4	T8	T16	T32	T64	TOTAL
Blind Draw 301 Doubles	Fri., Aug. 15 7:00 P.M	\$10/PERSON	1500	800	400	200	100	50	-	5500
Ladies' Cricket Doubles	Sat., Aug. 16 10:00 A.M.	\$30/TEAM	900	450	200	100	50			2550
Open Cricket Doubles	Sat., Aug 16 10:00 A.M.	\$30/TEAM	2200	1100	500	250	120	60		7220
**Ladies' 301 Singles	Sat., Aug. 16 2:00 P.M.	\$20/PERSON	1000	500	250	100	50	25		3200
**Men's 301 Singles	Sat., Aug. 16 3:00 P.M.	\$20/PERSON	3000	1500	750	200	100	50	25	9200
**Mixed 601 Triples	Sat., Aug. 16 7:00 P.M.	\$45/TEAM	2700	1350	600	300	150			7650
**Ladies' 301 Doubles	Sun., Aug. 17 11:00 A.M.	\$30/TEAM	900	450	200	100	50			2550
**Open 301 Doubles	Sun., Aug. 17 11:00 A.M.	\$30/TEAM	2200	1100	500	250	120	60		7220
**Finals/Awards	Sun., Aug. 17 5:00 P.M.									

^{**}Finals played onstage

NOTE: NO PERSONAL CHECKS WILL BE ACCEPTED ON SITE FOR ENTRY FEES/CASH/SUPPLIES.

FOR FURTHER INFORMATION:

Triple Crown Productions

10710 Richeon Avenue Downey, CA 90241 Phone: 562-927-8995

Fax: 562-927-6558







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EXHIBIT Q

NORTH AMERICAN OPEN DART TOURNAMENT

A Demographic History

By Della Fleetwood

Culver City Veteran's Auditorium

Disneyland Convention Center

1974 \$10000 781 Players 15 States 6 Nations 1975 \$15000 1054 Players 18 States 4 Nations

Queen Mary - Long Beach

1976 \$28500 1150 Players 22 States 7 Nations 1977 \$30000 1431 Players 25 States 8 Nations 1978 \$35500 1662 Players 30 States 11 Nations 1979 \$40000 1781 Players 31 States 9 Nations

Sahara Hotel - Las Vegas

1980 \$40000 1709 Players 35 States 12 Nations 1981 \$50000 1797 Players 35 States 12 Nations 1982 \$50000 1669 Players 35 States 12 Nations 1983 \$50000 1919 Players 40 States 16 Nations 1984 \$50000 1806 Players 40 States 14 Nations 1985 \$50000 1824 Players 42 States 10 Nations 1986 \$50000 1851 Players 43 States 12 Nations 1987 \$50000 1903 Players 44 States 16 Nations 1988 \$50000 2142 Players 46 States 16 Nations 1989 \$50000 2103 Players 47 States 17 Nations 1990 \$50000 2023 Players 46 States 16 Nations 1991 \$50000 1863 Players 46 States 12 Nations 1992 \$50000 1902 Players 47 States 15 Nations 1993 \$50000 1757 Players 44 States 14 Nations 1994 \$50000 1821 Players 46 States 15 Nations 1995 \$45000 2019 Players 47 States 12 Nations

Tropicana Hotel - Las Vegas

1996 \$45000 2007 Players 48 States 14 Nations

Aladdin Hotel - Las Vegas

1997 \$45000 1882 Players 48 States 14 Nations

Riviera Hotel - Las Vegas

1998 \$45000 1956 Players 48 States 14 Nations 1999 \$45000 2020 Players 48 States 14 Nation

Entry Statistics

EVENT	1970	1971	1972	1973	1974	1975	1976	1977	1978	1979
Men's 301 Singles	193	208	258	299	438	457	510	567	678	676
Ladies' 301 Singles	41	55	62	79	142	183	183	227	269	272
Men's Cricket Singles	_	_	_	_	-	-	-	-	-	-
Ladies' Cricket Singles	_	-	-	-		-	-	-	-	-
Men's 301 Doubles	116	142	165	208	305	316	364	389	417	470
Ladies' 301 Doubles	-	-	-	_	-	-	-	-	-	-
Men's Cricket Doubles	-	-	-	-	-	-	-	-	-	-
Ladies' Cricket Doubles	-	-	-	-	-	-	-	-	-	-
Mixed Doubles	-	-	-	_	=	274	315	348	406	408
Mixed Triples	-	-	-	-	-	-	-	-	-	-
Team Event	48	58	67	71	128	153	145	190	225	234
Blind Draw Doubles	-	-	-	-	-	-	_	-	-	-
	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989
Men's 301 Singles	623	651	557	634	587	526	516	510	707	687
Ladies' 301 Singles	261	241	218	247	219	169	187	196	238	256
Men's Cricket Singles	-	-	-	-	-	-	-	-	-	-
Ladies' Cricket Singles	-	-	-	-	-	-	-	-	-	-
Men's 301 Doubles	407	412	356	394	361	314	324	338	313	287
Ladies' 301 Doubles	-	-	-	142	130	111	108	116	124	122
Men's Cricket Doubles	-	-	-	-	-	283	293	299	335	333
Ladies' Cricket Doubles	-	-	-	-	-	90	93	99	117	124
Mixed Doubles	403	414	366	422	378	347	327	326	398	373
Mixed Triples	-	-	-	-	-	-	-	-	-	-
Team Event	194	195	162	185	169	-	-	-	-	-
Blind Draw Doubles	-	-	-	-	-	-	-	-	-	-
	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999
Men's 301 Singles	641	517	509	437	460	478	462	409	338	330
Ladies' 301 Singles	218	162	162	143	153	158	173	138	117	119
Men's Cricket Singles	-	-	-	-	-	-	-	-	379	400
Ladies' Cricket Singles	-	-	-	-	-	-	_	-	128	133
Men's 301 Doubles	292	223	240	196	206	227	215	182	215	214
Ladies' 301 Doubles	113	80	89	69	77	80	86	66	70	72
Men's Cricket Doubles	319	248	255	227	248	250	236	206	155	175
Ladies' Cricket Doubles	111	79	86	73	84	89	93	61	66	66
Mixed Doubles	356	284	268	191	-	-	-	-	-	-
Mixed Triples	-	-	-	-	171	146	156	120	-	-

Special Achievements

Most Valuable Player

1970 - 1975 No Award

1976 Ernie Rill

1977 John Lowe

1978 Bobby George

1979 Eric Bristow

1980 Len Heard

1981 Eric Bristow

1982 (Tie) Nicky Virachkul & Kim

Kelly

1983 Linda Batten

1984 Kathy Karpowich

1985 Kathy Maloney

1986 Kathy Maloney

1987 Kathy Karpowich

1988 Eva Grigsby

1989 Ron Baxter

1990 Ron Baxter

1991 Phil Taylor

1992 Mandy Solomons

1993 Kathy Maloney

1994 Kevin Spiolek

1995 Stacy Bromberg

1996 Stacy Bromberg

1997 Peter Manley

1998 Stacy Bromberg

1999 Roger Carter

Perfect 6-Dart Games

1970 - 1982 None

1982 Kevin Hayes

1983 None

1984 Mickey Hess

1985 - 1988 None

1989 Ron Baxter

1989 Eric Bristow

1990 Bob Bettis

1991 None

1992 Kevin Spiolek

1992 Brad Chavers & Kathy Theriot 1993 Ron Baxter 1994 Phil Taylor 1995 - 1997 None 1998 Ken Swanson & Dale Blankenship 1999 John Part

Miscellaneous Information

Sponsorship

Through the years, the NAODT has received Sponsorship from the following companies:

Accudart
Winmau
General Sportcraft
Unicorn
Nodor
Watneys
Ken Kercheval's Popcorn
Coors - George Killian Brand
Schlitz Brewing Company

Most Singles Titles

Stacy Bromberg (6)	1995 (301	Steve Brown (2)	1988 (301
	1996 (301		1989 (301
	1997 (301	Roger Carter (2)	1996 (301
	1998 (301 & Cricket		1999 (Cricket
	1999 (301	Ray Fischer (2)	1972 (301
Eric Bristow (4)	1979 (301		1973 (301
	1983 (301	Kathy Karpowich (2)	1978 (301
	1984 (301		1984
	1986 (301	John Kramer (2)	1981 (301
Kathy Maloney (4)	1985 (301		1999 (301
	1986 (301	John Lowe (2)	1985 (301
	1988 (301		1987 (301
	1993 (301	Gerry McCarthy (2)	1971 (301
Maureen Flowers (3)	1977 (301		1972 (301
	1979 (301	Phil Taylor (2)	1990 (301

	1981 (301		1991 (301
Mandy Solomons (3)	1989 (301	Lori Verrier (2)	1991 (301
	1990 (301		1999 (Cricket
	1992 (301		

Most Doubles Titles

Lori Verrier & Stacy Bromberg (8)	1994 (301 & Cricket
	1995 (301
•	1996 (301 & Cricket
	1997 (301
	1998 (301 & Cricket
John Lowe & Cliff Lazarenko (3)	1986 (301
	1988 (301
	1995 (Cricket
Sandy Reitan & Katy Hopkins (3)	1985 (Cricket
•	1988 (Cricket
*	1991 (Cricket
Mandy Solomons & Vicky Pruim (3)	1992 (301 & Cricket
•	1993 (Cricket
Ron Baxter & Peter Evison (2)	1989 (Cricket
•	1990 (301
Judy Campbell & Karen Lawman (2)	1985 (301
	1986 (301
John Lowe & Tony Brown (2)	1977 (301
n	1978 (301
Dot McLeod & Helen Chalson (2)	1999 (301
	1999 (Cricket
John Part & Gary Mawson (2)	1998 (Cricket
	1999 (Cricket

Top 10 Title Holders (All Events)

Stacy Bromberg	14
John Lowe	12
Lori Verrier	11
Kathy Maloney	9
Mandy Solomons	8
Eric Bristow	7
Bobby George	7
Bob Anderson	6
Paul Lim	6
Dennis Priestley	6

Conrad Daniels	5
Keith Deller	5
Kathy Karpowich	5
Phil Taylor	5

DREAMS DO COME TRUE by Della Fleetwood

Where would this great sport be without the 'dreamers'? Lucky for us, some 35 years ago, a dedicated group of **Southern California Darts Association (SCDA)** pioneers included as a major objective in their by-laws, the promotion of competitive darts. During the decade that followed, the club experienced the normal growth pains associated with the establishment of league darts, all the while 'dreaming' of the day when darts would be played for money. "Where would the money come from?" "What kind of set-ups would be needed?" "Would anyone come to play?" These questions and hundreds more were answered early in 1970, with the announcement of the 1st **North American Open Dart Tournament (NAODT)**, offering just over \$2,000 in prize money.

The 'skeptics' were overruled when the **SCDA** membership voted to raise their annual dues to help finance the tourney. Volunteers spent hundreds of hours planning the event, building nine two-sided setups, making phone calls, mailing publicity, etc., never once admitting to any doubts as to the ultimate success of their venture!

The word spread --- all the way to Philadelphia, the home of the American 'Woody' dart game. The **SCDA** patiently explained the English game to our new-found East Coast friends. They were provided with a board and the necessary supplies and information with which to learn the game.....plus an invitation to participate in the first annual **NAODT**.

The month of August was chosen, hoping that it might attract some vacationing dartists to 'sunny California'. It did just that --- when 250 darts enthusiasts from 4 States (California, Oregon, Pennsylvania & New Jersey) converged on the *Culver City Veteran's Auditorium* to play darts and 'win money'! **SCDA** members welcomed these players into their homes and hearts, and the royal carpet was laid for the "Philly Five".....who gratefully accepted the hospitality PLUS the championship money in the Team Event.....and continued to support the **NAODT** for many years.

The first **NAODT** featured four events and lasted two whole days! When the bills were paid, the books showed a slight deficit. However, memories of fun and fellowship and sponsorship support from Wisdom Imports (*Watneys* beer), Sunny Distributors (*Schlitz* beer) and *Sportcraft / Unicorn* encouraged the **SCDA** Board to begin planning the 2nd annual \$4,000 event.

Participation doubled over the next three years and, with the continued faithful support of our Canadian friends, the event truly became a North American Open. The tournament soon outgrew its Culver City home and the SCDA launched a search for a larger, more attractive site. Their efforts met with success, and the first \$10,000 darts tournament in North America took place at the *Disneyland Convention Center* in 1974. 'Mickey Mouse' and 'Money' proved to be a 'Magic' combination, attracting the first of many faithful British participants.

Two short years later, in commemoration of America's bicentennial, organizers chose to move the 'olde English game' into a more familiar environment.....an 'old English' ship, the *Queen Mary*. Fifty dartboards and \$28,000 in prize money greeted over 1100 players from

seven countries, many of whom danced the night away in the Flamenco Room. A Mixed Doubles event had been added in 1975, and the **NAODT** was now a three-day event.

The growth in prize money and participation continued. By 1979, the 70-board tournament filled all four ballrooms aboard the ship and over 1500 entrants booked the *Queen Mary* and many nearby hotels, to capacity.

Once again, a search was launched for a larger site. The new facility must include sufficient hotel rooms, space for more dartboards and, above all, a comfortable environment to help ease the stress, strain and endurance problems to be encountered by the anticipated 2,000 participants. Last, but not least, the financial requirements must not be excessive, in order to maintain what had now become a \$40,000 prize purse. Once again, it was said that we were 'dreaming'!

The search ended at the *Hotel Sahara*, in Las Vegas. Not only did the site meet our requirements, it also attracted additional players and sponsorship money. Best of all, for those in need of extra excitement, there was 24-hour entertainment.

Changes continued to be made. Prize money reached \$50,000 in 1981, thanks to sponsorship assistance from the *Adolph Coors Co*. In 1983, a Ladies' Doubles event was added to the schedule. The same year, the SCDA contracted with **Triple Crown Productions**, to make the **NAODT** the first jewel in the "Triple Crown of Darts. The Team Event was played for the last time in 1984 and was replaced by Open and a Ladies' Cricket Doubles events in 1985.

Old Capital Popcorn sponsored the 1987 tournament and players sampled their product throughout the weekend. Beginning in 1988, **Nodor Dartboard Company** was the **NAODT's** title Sponsor for five years. A Blind Draw Doubles event was added in 1993 and the following year, the Mixed Doubles became Mixed Triples. Men's and Ladies' Cricket Singles events were first played in 1998 and for the first time since 1975, the tournament no longer included a Mixed event.

After sixteen years (1980 thru 1995) at the *Sahara*, the hotel was sold and their ballroom facilities were no longer available for our use. The **NAODT** was destined to remain in Las Vegas. Moving first to the *Tropicana Hotel* in 1996, we settled in at the *Aladdin*, the following year. Three months later, the impending demise of that hotel became apparent. Following an intense search, the 1998 NAODT was moved to it's current home, the *Riviera Hotel & Casino*.

The same year, **Accudart** and **Winmau** were welcomed as title sponsors of the tournament. Their continued involvement will help assure the future of this great event.

Since 1980, L. David Irete of *Triple Twenty Productions* has filmed every **NAODT** staged Final. Thanks to his continued interest and considerable personal investment of time and money, video tapes of our tournament have been viewed in many parts of the world for the past two decades.

None of this would have been possible, had it not been for the 'dreamers'.....the financial generosity of corporate sponsors and private investors.....the countless volunteers..... and the faithful participation and support of thousands of darters throughout the U.S. and the darting world. You will help us to write the next chapter of NAODT history. With your loyal support, 'dreams' can and will continue to come true for the *Accudart / Winmau North American Open Dart Tournament*!

MEMORABLE NAODT HI-LIGHTS

1970: - The first national dart tournament offering cash prizes (\$2,000) was staged by the SCDA (at the time the country's largest dart league) at the Culver City (CA) Veteran's Auditorium.

- 252 Players from 4 States
- Bar consumption = 5,000 bottles of beer + 28 cases of liquor
- Singles Champions Vince Lubbering & Robbi Dobbs earned an appearance on the *Art Linkletter Show.* **1971:** Again staged in Culver City, the prize purse doubled to \$4,000
- 319 players from 5 States and the first Canadian participation
- Singles titles were won by Bob Thiede and young Gerry Dover (McCarthy)

1972: - 384 Players from 5 States + Wash DC and Canada competed for \$6,000 in the five events

- Bar consumption = 8,640 bottles of beer + 125 quarts of liquor at 2 serving stations
- Gerry Dover (McCarthy) repeated as Ladies' Champion and Ray Fischer won his first NAODT Singles title, shooting 19's with wooden darts
- Tom Fleetwood (the current SCDA Prez) made his debut at the Control Desk
- **1973:** The last year the NAODT was staged at the Culver City Vet's Auditorium 542 Players from 10 States + Wash DC and Canada competed for \$7,560
- Ray Fischer repeated as Singles Champion, this time shooting 20's with brass darts
- The number of playing boards increased to 24
- **1974:** The tournament moved to the 20,000 sq. ft. Convention Center at the Disneyland hotel, with 36 playing boards + 8 for practice
- 781 Players from 14 States + Wash DC and 6 nations (Canada, England, Mexico, Sweden, Wales & the US) competed for the first ever \$10,000+ prize purse
- Singles titles were won by Joe Baltadonis and Helen Scheerbaum

- The first British contingent (12 in all) were hosted (hotel, meals, tours, etc.) through the generosity of Bob Martel of *Mothers* pub, in Inglewood, CA
- The bar grossed \$9,000
- 1975: The tournament returned to the *Disneyland Hotel Convention Center* and featured a \$15,000 purse.
- Nicky Virachkul won his first NAODT title (the 301 Doubles w/Joe Baltadonis)
- It was the "Year of the Youth:
- 10 yr. old Darren Farley was a member of the Champion 5-Person Team
- 17 yr. old Julie Nicoll captured the Ladies' Singles crown
- **1976:** Prize money increased to \$28,500 as we literally took over the *Queen Mary*, using all four ballrooms.....situated on 3 decks of the ship.
- As matches were called, players were provided with maps to find their playing boards.
- Walkie-Talkies were used to communicate open boards
- The first Saturday night "NAODT Dance" was held in the Flamenco Room
- The ever-popular James Gang shirt concession came on the scene
- The sound system went out BEFORE we started the Friday night Mixed Doubles
- Tom called the event without a microphone and we used speakers belonging to Jody Simkins' teenage son for the rest of the weekend
- Londoner, Ricky Fusco, won the Singles. His victory "belly" dance was a high-light of the weekend.
- Tom remembers spending 34 hours calling matches from the Control Desk
- Della got a total of 7 hours sleep during the weekend and, since the restaurant and tournament hours did not coincide, her total food intake consisted of 5 Snicker bars!
- 1977: The prize money increased to \$30,000 during our second year aboard the ship.
- Players from 8 countries witnessed Maureen Flowers take her first NAODT Ladies' Singles title. John Lowe won the first of his 12 NAODT Championships --- the 301 Doubles with partner, Tony Brown.
- **1978:** Bobby George took the Singles in this year's NAODT --- worth \$35,500 --- and was the first NAODT Singles Champion to be invited to participate in the Winmau World Masters.
- At 16 years of age, Kathy Karpowich became the youngest NAODT Ladies' Singles Champ.....a record which still stands today.
- John Lowe won three events (Mixed Doubles / 301 Doubles / Team)
- 1979: We celebrated the 10th anniversary of the NAODT aboard the *Queen Mary*, with a prize purse of \$40,000
- Eric Bristow won the first of his four Singles crowns and partnered with Leighton Rees to capture the 301 Doubles event.
- Maureen Flowers took her second Ladies' Singles title
- **1980:** The tournament moved to Las Vegas' Hotel Sahara over strong objections from a few of the SCDA's 3000 members. Yet, 43% of the players in the 11th NAODT were, in fact, members of the SCDA.
- L. David Irete (Triple 20 Productions) filmed the Finals for the first time.
- Len Heard defeated popular Canadian, Fred Boyce in the Singles. Fred treasured his moment in the NAODT spotlight.....and just a few months later, we were all saddened by the news of his passing.
- The British contingent won all remaining events.
- 1981: Coors sponsored the first \$50,000 NAODT
- There were 85 playing boards
- Maureen Flowers took home her 3rd Ladies' Singles Championship
- Southern California's John Kramer surprised and delighted the crowd by defeating Eric Bristow in the Singles Final.
- 1982: We had Americans in the winner's circle in all 5 events.
- Singles Champions, Nicky Virachkul and Angie Burns were both invited to the Winmau World Masters, with airfare provided by *Pan American Airways*.
- The late Kevin Hayes became the first player in NAODT history to achieve a Perfect 6-Dart 301 game....and he did it twice (back to back) in the Singles event
- **1983:** Triple Crown Productions took over the operation and financial responsibility for the NAODT, and added a Ladies' 301 Doubles event to the schedule
- Watneys was the title sponsor. By the end of the first event, we had tapped every available keg of Watneys beer in Las Vegas. No problem.....Frank Dickens drove back to Irvine, CA (600 miles round

trip), filled his station wagon with 15 kegs of Watneys, and was back in time for the first event on Satuday morning!

- Eric Bristow won his second Singles title

- Linda Batten won the Ladies' Doubles, paired with Keith Deller to win the Mixed Doubles, and Deller was also on the winning 4-Man Team.

1984: - Forty states and 16 countries were represented at the 15th annual NAODT

- The NAODT was the first ADO Sanctioned event to be included in the new *World Darts Federation* Player Rankings

- Eric Bristow became the first player to win 3 NAODT Singles title

- At the ripe old age of 22, Kathy Karpowich captured her second NAODT Ladies' crown

1985: - We built a brand new stage set for this year's tournament

- Open / Ladies' Cricket Doubles were played for the first time

-Thanks to Triple 20 Productions, the NAODT Finals were aired 15 times on the nationwide FNN Cable TV program "SCORE"

- John Lowe and Kathy Maloney each seized their first NAODT Singles crown

1986: - Bristow became the first player in NAODT history to win 4 Singles championships

- Maloney repeated as Ladies' Champion while Judy Campbell and young partner Karen Lawman (Smith) successfully defended their Ladies' 301 Doubles title

- The first NAODT Raffle to Fight Child Abuse generated \$1500.00

1987: - Ken Kercheval's *Old Capital Popcorn* sponsored the 18th NAODT and players enjoyed fresh popped corn throughout the weekend

- We honored the memory of Vince Lubbering, the first NAODT Singles Champ

- Lowe won his second NAODT Singles crown and Kathy Karpowich received her first MVP award.

- The Raffle to Fight Child Abuse tallied a record of \$5,000

1988: - NODOR was our Title Sponsor

- The tournament attracted over 2,000 players for the first time in it's history

- Maloney captured her 3rd NAODT Singles crown and Steve Brown took his first NAODT Singles championship

- We were shocked and saddened by the sudden death of well-known ADO Int'l. player, K.C. Mullaney, late Friday night

1989: - The Hotel Sahara added a new tower of rooms just prior to the 20th anniversary staging of the

- Steve Brown was successful in his defense of the NAODT Singles

- Mandy Solomons took home her first NAODT Ladies' Singles trophy

1990: - Phil Taylor defeated MVP Ron Baxter in the Singles Final

- Mandy Solomons repeated as Ladies' Singles Champion and won the Ladies' 301 Doubles (w/ Lil Coombes) and the Mixed Doubles (w/ John Lowe)

- TCP donated \$1.00 per Singles entry (\$859.00 total) to the newly established *ADO Memorial Scholarship Fund*

1991: - TCP unveiled 80 new set-ups for this year's event. It was a spectacular sight as one approached the hall direct from the Sahara escalator

- Sandy Reitan and Katy (Casillas) Hopkins became the first duo to win three NAODT Doubles titles

- MVP Phil Taylor repeated as Singles Champion, needing only 29 darts in three legs to defeat Jerry Umberger. His PPD was 3I.14!!

1992: - For the first time in history, no Americans made it to the 'Victory Circle'

- Alan Warriner was Singles Champ

- Mandy Solomons won her 3rd NAODT Ladies' Singles crown and partnered Belgian, Vicky Prium, to take both Ladies' Doubles titles and win the MVP award

1993: - Bob Anderson topped the Singles field. MVP Kathy Maloney became the first woman to win 4 NAODT Singles events and, in so doing, she tied John Lowe for the most NAODT titled (10), to date.

1994: - Sportcraft / Unicorn sponsored the Silver Anniversary staging of the NAODT.

- Mixed Triples replaced Mixed Doubles on the schedule

- Newcomer, Barbara Barnes, shocked the darting world with her Ladies' Singles victory

- 1991 Ladies' Champion Lori Verrier partnered Stacy Bromberg to win both Ladies' Doubles events

- In a display of their appreciation for "25 Years of Opportunity", Eric Bristow presented the Fleetwoods a crystal bowl, engraved with the signatures of 25 of Great Britain's top players

1995: - Once again, over 2,000 players came from 47 states and 12 nations to compete

- Rudy Hernandez and Stacy Bromberg each won their first NAODT Singles title
- Bromberg & Verrier repeated as the Ladies' 301 Doubles Champs
- Bromberg copped her first MVP award

1996: - Following the sale of the Hotel Sahara, the NAODT moved to the Tropicana Hotel, located at the opposite end of the Las Vegas strip. It was "survival of the fittest" in the overly large, metal-roofed hall. TCP rented carpet for the playing area, and players tolerated a bad sound system and poor bar service throughout the weekend. Not a pleasant memory for anyone involved!

- Roger Carter topped the Singles field for the first time
- Bromberg repeated as Ladies' Singles Champion and won her third Ladies' 301 Doubles title with partner, Lori Verrier

1997: - The Aladdin Hotel welcomed the NAODT event, willingly closing their 24-hr. Bingo facility to accommodate the event.

- Winning both the Singles and 301 Doubles title, England's Peter Manley was named MVP
- Stacy Bromberg continued her streak by winning her 3rd Ladies' Singles and (partnered with Lori Verrier) her 4th Ladies' 301 Doubles title
- Three months later, TCP received notice of the pending 'implosion' of the Aladdin facility. Could there be such a thing as a "TCP Curse"? After all, the Sahara had closed their ballroom facility.....the Hacienda (home of the Las Vegas Open) had been 'imploded'.....and now, we were facing the demise of the Aladdin.

1998: - We found a new home at the Riviera Hotel

- Men's / Ladies' Cricket Singles were played for the first time
- Accudant / Winmau came aboard as Title Sponsors and guaranteed a special \$50,000 cash prize for the first Perfect Cricket Singles Game.
- Stacy Bromberg wrote her own page in NAODT history:
- She won both Ladies' Singles and both Ladies' Doubles events
- She became the first player to capture 5 Singles titles
- She & Verrier have now won 8 Ladies' Doubles events More than any other Doubles duo
- She has now won a total of 13 NAODT Championships
- She has now equaled Kathy Maloney's record by achieving her 3rd MVP award

1999: - The Riviera Hotel welcomed us to a brand new ballroom for the 30th NAODT

- 1981 Champion John Kramer returned 18 years later to defeat 1996 Champ Roger Carter in the Men's 301 Singles
- Roger Carter defeated defending Champion Paul Lim for the Men's Cricket Singles crown and was named the 1999 NAODT Most Valuable Player
- Australian Women's World Cup team Dot McLeod and Helen Chalson won both the Ladies' 301 and Ladies' Cricket Doubles titles
- Canadians John Part and Gary Mawson repeated as Men's Cricket Doubles Champs
- Finalists in both Ladies' Singles events were Stacy Bromberg and Lori Verrier
- Verrier won the Ladies' Cricket Singles for her second NAODT Singles title
- Bromberg won her 5th consecutive Ladies' 301 crown (her 6th NAODT Singles title) and now has a total of 14 NAODT Championships

EXHIBIT R

Emilorised'

6-516736

the office of the ecustary of ARTICLES OF INCORPORATION

OF

By James E HAVI'S De, why

FIRST:

The name of this corporation is: SOUTHERN CALIFORNIA DARTS ASSOCIATION. INC.

SECOND:

This is a comprofit corporation organized under Part I, Division 2, Title 1 of the corporations code of the State of California relating to comprofit corporations, and does not contemplate a pecuniary gain or profit of its members.

THIRD:

- A. The specific and primary purpose for which this corporation is formed is: To create interest in, to promote, to maintain, and to publicize competitive darts, in the State of California.
- B. The general purposes and powers for which this corporation is formed are:
 - 1. To create and manage competitive dart leagues.
- 2. To acquire, own, hold, lease and possess property of every kind and character, whether real, personal or mixed, and to receive donations, contributions, endorsements, gifts, grants, requests and devises thereof, and devote the same to charitable purposes.
- 3. To exercise all powers granted by law to non-profit corporations.

FOURTH:

Wo member shall have an pecuniary interest inclusever in or to any of the assets of the corporation and no income, increments or other pecuniary or proprietory gain, lenefit or advantage or any kind in any way arising from or growing out of the assets of the corporation or its operation shall inure to or in any way go to or

yest in any member of the corporation.

FIFTH:

All property which shall hereafter be owned or acquired by the corporation is irrevocably dedicated to charitable and educational purposes, and upon liquidation, dissolution, or abandonment of this corporation, no part of its property shall inure to the confit of or be distributed to any private person but shall be conveyed to a fund, foundation or corporation organize? and operate for charitable and educational purposes.

SIXTH:

The principal office of this corporation and the principal place of business of the corporation is to be located in the County of los Augeles, State of California.

SEVENTH:

This corporation is one which does not contemplate pecuniary gain or profit to any members thereof, either in carrying out of its objects and purposes or incidental to its main purposes

EIGHTHE

This corporation is not authorized to issue shares of stock, but membership in this corporation may be evidenced by membership certificates.

NINTH:

This organization is not the outgrowth of, successor to, or continuance of any unincorporated predecessor.

TENTH:

The names of the persons who are to act in the capacity of directors until the election of their successors are:

NAME

ADDRESS

James Blair

2122 Penmar Avenue, Venice

Albert Ash

1710 Grismer Avenue, Burbank

Richard Mitruen

12520 Pacific Avenie, Los Angele

NAME

ADDRESS

Terrence W. Sutton

13019 Wilkie Avenue, Gardena

Hanley Thomas

11655 Chio Avenue, 46, Los Angele

Pred Collagan

3316 Caroline Avenue, Culver City

James W. Armstrong

5225 Coldwarter Canyon Wenue.

North Hollywood

Roy L. Dean

2208 - 22nd Street, Santa Monica

Joseph O. Debus

7022 Rindge Avenue, Playa Del Rey

The number of persons so named shall constitute the number of directors of the corporation until changed by an amendmen to the articles or by a by-law; and specific authority is hereby given to adopt at any time and from time to time a by-law changing the number of directors.

ELEVENTH:

The authorized number and qualifications of members of the corporation; the different clauses or membership, if any; the property; voting; and other rights and privileges of each class of membership; and the liability of each or all classes for dues or assessments and the method of collection thereof, shall be set fort in the by-laws.

TWELFTH:

The by-laws of this corporation shall be adopted by the vote or written assent of a majority of the directors named in the Articles of Incorporation, and thereafter may be amended or repeale or additional by-laws may be adopted by any means provided in the by-laws.

IN WITNESS WHEREOF, we, the undersigned incorporators of the SOUTHERN CALIFORNIA DARTS ASSOCIATION, INC, have hereunto set our hands this 30 day of pepcember, 1966.

JAMES BLAIR

JEL OF LEAT (Joh)

ALBERT SH

151 Bichard Mitruen

RICHARD MITRUEN

TERRENCE W. SUTTON

AND HANLEY THOMAS

IST THOMAS

IST

STATE OF CALIFORNIA)
BES.
COUNTY OF LOS ANGELES)

On this day of September, 1966, before me. the undersigned, a Notary Public in and for the County of Los angeles. State of California, personally appeared James Blair, about sh, Richard Mitruen, Terrence W. Sutton, Hanley Thomas, Fred Collagan, James W. Armstrong, Roy L. Dean and Joseph O. Debus, known to see to be the persons whose names appear in the within instrument and whose names are subscribed thereto and savevally acknowledged to me that they executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County of Los Angeles, State of California, the day and year first acove written.

Notary Public in and for said County and State.

EXHIBIT S



Contact: Publicity Department publicity@southerncaliforniadartsassociation.com

FOR IMMEDIATE RELEASE August 29, 2011

Southern California Darts Association, Inc. Returns From The Dead After 34-Years

GLENDALE, CALIF. August 29, 2011 — Southern California Darts Association, Inc. ("SCDA"), a California corporation, is returning from the dead, after becoming a "defunct corporation" 34-years ago. SCDA will be operating in Southern California, predominantly in Los Angeles and Orange County. League signups will commence in November 2011 and the first matches will be held in January 2012. Southern California Darts Association was organized in the early 60s and incorporated on October 19, 1966. By all accounts, the association operated as a lawful California corporation until March 1, 1977, when it was suspended by the California Franchise Tax Board. Since the first day of March in '77, SCDA operated illegally throughout many local pubs in the Los Angeles area until the association was resurrected and brought back to legal standing on January 3, 2011, by Dino M. Zaffina, the corporation's President and CEO.

The "defunct" Southern California Darts Association, Inc. of old operated under the guise of being a nonprofit organization. Based on all relevant public records the old SCDA never established 501(c)(3) status with the Internal Revenue Service. The revived SCDA is now a legal and "for profit" corporation owned and operated by the corporation's shareholders.

Based on the new and legal Southern California Darts Association, Inc., the "illegal" SCDA will no longer be operating anywhere in the United States of America. And, the men who claim to be board members of SCDA are devoid of any power over SCDA business affairs, since none of them are board members or officers of the legal SCDA.

Southern California Darts Association, Inc. will be providing dart enthusiasts with the most exciting dart leagues and tournaments ever promoted. During league matches and tournaments, the top shooters will stand to win money and prizes for their achievements. All business establishments who provide a venue for SCDA shooters, will be given the first ever opportunity to profit from league dart matches and tournaments.

"Shoot well!"







FOR IMMEDIATE RELEASE September 3, 2011

Contact: Publicity Department publicity@socaldartsassoc.com

Southern California Darts Association, Inc. Provides Safe Harbor To Business Establishments

GLENDALE, CALIF. September 3, 2011 — Southern California Darts Association, Inc., a California corporation, also doing business as SCDA, So Cal Darts Association, So Cal Darts, and SCDA Products, is a legal and "for profit" corporation owned and operated by the corporation's shareholders. Southern California Darts Association, Inc. and its subsidiaries have provided business establishments with a safe harbor, so that they can safely avoid violating the rights of these entities.

Southern California Darts Association, Inc. and its subsidiaries are distinct from the "old" association that has been conducting business "illegally" in the greater Los Angeles area, over the past 34-years. These business entities were provided proper notice that L. David Irete is not associated in anyway with Southern California Darts Association, Inc. or its subsidiaries. Moreover, that Mr. Irete does not have any authority to conduct business on behalf of any of the aforementioned entities, and his wife, Allison M. Irete does not have any control over the aforementioned entities' finances.

This "safe harbor," if the business establishments act prudently and heed the warning, will protect the businesses from the forthcoming lawsuit entitled <u>Southern California Darts Association, Inc. v. L. David Irete; Patrick M. Michaels; Allison M. Irete; Varand Abnoos; Todd M. Zebert; Ronald W. Tuttle; Levon A. Goganian; Harvey M. Fischer; Barry J. Houghton; and Does 1 thru 500.</u>

Any association with Mr. Irete or the other defendants listed above while conducting business that conflicts with Southern California Darts Association, Inc.'s and its subsidiaries' interests may be held liable for damages to the aforesaid entities. Liability not only extends to businesses, but to <u>all individuals</u> who, while playing darts, falsely represent an affiliation with the aforementioned business entities.

Mr. Irete, et al. are placing each and every business and player in jeopardy of becoming a defendant in the aforementioned lawsuit. It is established that Mr. Irete and a group of dart players are scheduled to conduct league play at various establishments during the period of September 12, 2011, thru December 19, 2011. This league play is falsely representing that the darts matches scheduled are sanctioned by Southern California Darts Association, Inc. or its subsidiaries. They are not.







FOR IMMEDIATE RELEASE September 15, 2011

Contact: Publicity Department publicity@socaldartsassoc.com

Unnamed Unincorporated Association To Be Sued By Southern California Darts Association, Inc.

GLENDALE, CALIF. September 15, 2011 — Southern California Darts Association, Inc., provided fair warning to an unnamed unincorporated association to "Cease and Desist" its "illegal operation" being conducted in the greater Los Angeles area. This association of men and women are acting in concert with local business establishments to violate the exclusive legal rights of Southern California Darts Association, Inc. and its subsidiaries, SCDA, So Cal Darts Association, So Cal Darts, and SCDA Products.

Southern California Darts Association, Inc. will put a stop to these tortfeasors in Superior Court of the State of California, County of Los Angeles, North Central District seated in Glendale, California. A "draft" of the caption and causes of action of the Verified Complaint is attached. If the defendants named in the verified complaint do not cease their unlawful behavior by 5:00 p.m. on Friday, September 16, 2011, the verified complaint will be filed and served upon each and every named defendant.

The unnamed unincorporated association and the associated business establishments must cease the following.

CEASE:

- 1. disseminating any information with the names Southern California Darts Association, Inc. and its subsidiaries, SCDA, So Cal Darts Association, So Cal Darts, and SCDA Products.
- 2. representing publicly or privately that you have an affiliation with Southern California Darts Association, Inc. and its subsidiaries, SCDA, So Cal Darts Association, So Cal Darts, and SCDA Products.
- 3. using the name Southern California Darts Association on the Bank of America checking account designated by account number 03611-69748.
- 4. using the name Southern California Darts Association on the Internet.
- 5. using the domain name <u>www.socaldarts.com</u> and to not redirect any Internet traffic from that domain name to any other website.





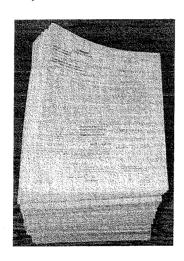


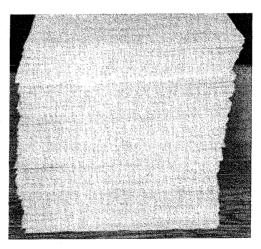
FOR IMMEDIATE RELEASE September 27, 2011

Contact: Publicity Department publicity@socaldartsassoc.com

Southern California Darts Association, Inc. Sues Violators To Protect Its Rights

GLENDALE, CALIF. September 27, 2011 — On September 26, 2011, Southern California Darts Association, Inc. filed a lawsuit in the Los Angeles Superior Court against L. David Irete, 66 named defendants, and 500 doe defendants. The complaint entitled **Southern California Darts Association, Inc. v. L. David Irete, et al., Case No. LASC EC056642** was filed in the North Central District—Glendale Courthouse, but as is the case when filing in this district and the neighboring North Central District—Burbank Courthouse, the venue of the cases are alternated. This case will now be prosecuted at 300 E. Olive Avenue, Department A, Burbank, California 91502, before the Honorable Judge William D. Stewart.





Due to the urgency of this matter, Southern California Darts Association, Inc. personally served 65 defendants the night of the filing while they defiantly continued to violate Plaintiff's exclusive legal rights. These defendants are now obligated to respond to the complaint by filing a first response. Each defendant will be responsible for paying a filing fee to the county in the amount of \$395.00. The defendants, however, do have another option; they can cease their unlawful actions forthwith.

Any defendant interested in avoiding litigation and the ultimate damages that are forthcoming, can contact Dino M. Zaffina, President and CEO of Southern California Darts Association, Inc., at dino@socaldartsassoc.com, to ascertain the requirements to be released from the aforementioned legal action.







FOR IMMEDIATE RELEASE September 29, 2011

Contact: Publicity Department publicity@socaldartsassoc.com

Southern California Darts Association, Inc. Continues Bringing Violators To Justice

GLENDALE, CALIF. September 29, 2011 — On September 28, 2011, just two days after Southern California Darts Association, Inc. ("SCDA") filed a lawsuit in the Los Angeles Superior Court against L. David Irete, 66 named defendants, and 500 doe defendants, and later that evening personally serving 64 dart player defendants and one pub owner (i.e., *The Robin Hood Pub, Inc.*), SCDA was on the hunt once again. SCDA personally served Harvey M. Fischer, Barry J. Houghton and 7 other defendants, as well as, another pub owner (i.e., *Intrepid Slug, Inc.* dba Cat & Fiddle Restaurant & Pub).

Currently, the case entitled <u>Southern California Darts Association</u>, Inc. v. L. David Irete, et al., <u>Case No. LASC EC056642</u> has **75 defendants at issue**. Each and every defendant is now required by law to respond to the complaint by filing a written response within 30-days of service. Each defendant will be required to pay a filing fee to the court clerk in the amount of <u>\$395.00</u>. Some defendants, however, are handling this matter prudently (and avoiding this requirement altogether) <u>by immediately ceasing their unlawful actions and settling with SCDA</u>.

Those other defendants that are acting imprudently, by defiantly maintaining their illegal position of violating SCDA's exclusive legal rights, will find themselves preparing responses to discovery requests that will be forthcoming after the 10th day they were served with process (i.e., on September 6 and 8, 2011, respectively).

The discovery requests will consist of (i) Form Interrogatories, (ii) Special Interrogatories, (iii) Requests for Admission, (iv) Demand for Production of Documents, and (v) a videotaped Deposition. Some examples are as follows: (a) State your present residence address, your residence address for the past five years, and the dates that you lived at each address; (b) Admit or deny that you were aware of the true and legal Southern California Darts Association, Inc. prior to September 12, 2011; and (c) Produce all your payroll check stubs for the past five years.

Any defendant interested in avoiding litigation, discovery requests, and the ultimate damages that are forthcoming, can contact Dino M. Zaffina, President and CEO of Southern California Darts Association, Inc., at dino@socaldartsassoc.com, to ascertain the requirements to be released from the aforementioned legal action.







FOR IMMEDIATE RELEASE October 11, 2011

Contact: Publicity Department publicity@socaldartsassoc.com

Southern California Darts Association, Inc. v. L. David Irete, et al. Defendants are No Longer Alone—Their Pide Piper is Now "At Issue."

GLENDALE, CALIF. October 11, 2011 — All <u>80 defendants</u> in the case entitled <u>Southern California Darts Association, Inc. v. L. David Irete, et al., Case No. LASC EC056642 can make room at the defendant's table for <u>5 more defendants</u>, including, the "*Pide Piper*" himself. On the evening of October 10, 2011, Southern California Darts Association, Inc. ("SCDA") personally served Buchanan Arms, Inc., Ravakeen Corporation (dba Ireland's 32), Evan Hughes, L. David Irete, and Todd M. Zebert.</u>

All 5 of these defendants, along with their 80 cohorts, will be required to file a "verified" answer to the "verified" complaint. All defendants are required to pay a filing fee to the court clerk in the amount of \$395.00. If any defendant fails to file a "verified" answer, SCDA will lodge with the court clerk a *Request for Entry of Default* against the defaulting defendant(s).

Defendants Served On	Deadline To File Answer	Filing Fee		
September 26, 2011	October 26, 2011	\$395.00		
September 28, 2011	October 28, 2011	\$395.00		
October 2, 2011	November 1, 2011	\$395.00		
October 3, 2011	November 2, 2011	\$395.00		
October 10, 2011	November 9, 2011	\$395.00		



Those defendants who are not interested in following the "Pide Piper" off the cliff into the sea of joint and several liability, have the option to contact Dino M. Zaffina, President and CEO of SCDA at dino@socaldartsassoc.com, to ascertain the requirements to be released from the aforementioned legal action.

"There is no other possible way out."







FOR IMMEDIATE RELEASE October 14, 2011

Contact: Publicity Department publicity@socaldartsassoc.com

Defendants' Time is Running Out in the Matter of Southern California Darts Association, Inc. v. L. David Irete, et al.

GLENDALE, CALIF. October 14, 2011 — All <u>85 defendants</u> in the case entitled <u>Southern California Darts Association</u>, Inc. v. L. David Irete, et al., Case No. LASC <u>EC056642</u> are required to file "verified" answers to the "verified" complaint and pay a filing fee to the court clerk in the amount of <u>\$395.00</u>. Including today's date, the <u>defendants' deadlines are between 13-to-27 days</u> away. (*See* Calendar below).

			OCTOBER			
S	M	T	W	T	F	S
					14 Today's Date	15
16	17	18	19	20	21	22
23	24	25	26 65 Defendants served on 09/26/11, your "verified" answer is due on this day.	27	28 10 Defendants served on 09/28/11; your "verified" answer is due on this day.	29
30	31					
			NOVEMBER			
		3 Defendants served on 10/02/11; your "verified" answer is due on this day.	2 Defendants served on 10/03/11; your "verified" answer is due on this day.	3	4	5
6	7	8	5 Defendants served on 10/10/11; your "verified" answer is due on this day.	10		







FOR IMMEDIATE RELEASE January 20, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

SOUTHERN CALIFORNIA DARTS ASSOCIATION, INC. PREVAILS

GLENDALE, CALIF. January 20, 2012 — Southern California Darts Association, Inc. ("SCDA") and Dino M. Zaffina ("Zaffina") the corporation's President and CEO prevailed against William F. Lynch's ("Lynch") Cross-Complaint brought in conjunction with his status as a defendant in the matter of Southern California Darts Association, Inc. v. L. David Irete, et al., Case No. LASC EC056642.

Lynch filed the Cross-Complaint on October 26, 2011, just one month after he was personally served with the complaint for the above-entitled case. Almost immediately, SCDA filed an Anti-SLAPP Motion (SLAPP refers to Strategic Litigation Against Public Participation) to the Cross-Complaint and Zaffina filed a Demurrer. It was SCDA and Zaffina's contention that the Cross-Complaint was a SLAPP Suit (i.e., brought to "chill" SCDA's Complaint). The motion to strike and demurrer were scheduled to be heard on December 16, 2011.

On December 15, 2011, the Court published on the Court's website on the Internet an extremely detailed 5-page tentative ruling that eloquently and copiously set forth the law and the Court's rationale for its tentative decision to rule in favor of SCDA and Zaffina. The Court's tentative ruling left no question that the Court devoted a great number of hours in the review of all the documents prepared by Lynch's counsel and the moving papers prepared by SCDA's counsel, Robert E. Racine ("Racine") for the motion to strike and Zaffina for his demurrer.

The Court's tentative ruling granted SCDA's motion to strike Lynch's Cross-Complaint under CCP § 425.16 and **ORDERED** Lynch to pay attorney's fees to SCDA under CCP § 425.16(c) in the amount of §4,500.00 within thirty days. Also, the Court determined that in light of the intention to grant the motion to strike Lynch's Cross-Complaint, the Court took Zaffina's demurrer off calendar as moot.

When the matter was heard by the Court on December 16, 2011, the Court provided a generous amount of time for oral arguments. Based on the tentative ruling, Lynch's counsel diligently and zealously tried to change the Court's mind, but because nothing new was introduced, the attempt was futile. At the same hearing, Racine provided the Court with documented evidence as to why his hourly rate should be \$600.00 per hour instead of \$300.00. Based on Racine's request, the Court took the matter under submission.

On January 9, 2012, the Court ruled on SCDA's motion to strike stating in a 14-page Minute Order (See Attached "Order") that "The Court's tentative ruling as published on December 16, 2011, to stand."

Although Racine is paid an hourly rate of \$600.00 per hour and would most likely receive this amount from the defendants for other motions and for attorney's fees after the conclusion of the trial, nevertheless, based on CCP § 425.16(c), the Court determined that the amount must be a "reasonable billable rate in this community" for an Anti-SLAPP motion (i.e., an amount that is "average" to all lawyers). Therefore, the Court ruled that the attorney's fees owed to SCDA are \$4,500.00 instead of \$9,000.00.

Based on the dismissed Cross-Complaint, William F. Lynch must pay SCDA <u>\$4,500.00 within</u> <u>30-days of January 9, 2012</u>, and must pay <u>Zaffina \$435.00 for costs</u>, for a TOTAL of **\$4,935.00**.







FOR IMMEDIATE RELEASE January 21, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

DEFENDANTS REACH SETTLEMENT AGREEMENT

GLENDALE, CALIF. January 21, 2012 — Southern California Darts Association, Inc. ("SCDA") has <u>reached settlement agreements with 18 of the current 85 defendants</u> in the matter of <u>Southern California Darts Association</u>, Inc. v. L. David Irete, et al., <u>Case No. LASC EC056642</u>. The following 18 defendants enumerated below <u>have all been released</u> from the above-entitled action by Plaintiff, Southern California Darts Association, Inc.

- 1. Defendant, **HOLMAN ENTERPRISES**, **INC**. (dba Pickwick's Pub);
- 2. Defendant, THE ROBIN HOOD PUB, INC. (dba Robin Hood British Pub);
- 3. Defendant, BUCHANAN ARMS, INC. (dba Buchanan Arms);
- 4. Defendant, YE OLDE KINGS HEAD, INC. (dba Ye Olde Kings Head British Pub);
- 5. Defendant, COCK 'N BULL (Sole Proprietorship);
- 6. Defendant, RAVAKEEN CORPORATION (dba Ireland's 32);
- 7. Defendant, INTREPID SLUG, INC. (dba Cat 'N Fiddle Pub & Restaurant);
- 8. Defendant, CRAIG R. HOLMAN;
- 9. Defendant, CHRISTOPHER J. HOLMAN;
- 10. Defendant, **DONDI F. BASTONE**;
- 11. Defendant, ELLA BASTONE;
- 12. Defendant, GREGORY C. PALMER;
- 13. Defendant, JAMES BETTE;
- 14. Defendant, LEILA SHAKERCHI;
- 15. Defendant, TED DYKMAN;
- 16. Defendant, ANTHONY MOOGAN;
- 17. Defendant, FRANCES MOOGAN; and
- 18. Defendant, JOHN A. REDMOND.







FOR IMMEDIATE RELEASE January 27, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

MOVING FROM BURBANK TO LOS ANGELES

GLENDALE, CALIF. January 27, 2012 — The matter of <u>Southern California Darts Association</u>, Inc. v. L. David Irete, et al., <u>Case No. LASC EC056642</u> may have a new home.

During the Case Management Conference on January 26, 2012, the Honorable Judge William D. Stewart in Department "NC-A" of the Los Angeles Superior Court located at 300 E. Olive Street, Burbank, California 91502 inquired as to the status of the case. Robert E. Racine, Esq., appearing on behalf of Plaintiff, Southern California Darts Association, Inc. ("SCDA") explained to the Court that 85 defendants have been served and the matter is moving along.

Mr. Racine informed the Court that there is a Motion to Compel three defendants, Harvey M. Fischer, Todd M. Zebert, and L. David Irete to respond to SCDA's discovery requests. The hearing is scheduled for February 24, 2012, at 08:30 a.m. in the aforementioned Court. Defendants Fischer, Zebert, and Irete will be required to provide proper responses to the discovery requests or they may, if they so choose, oppose the motion, and thus, provide an answer to the Court as to why they are not providing responses pursuant to the rules of discovery. If the Court grants SCDA's motion, Fischer, Zebert, and Irete will be Ordered by the Court to provide further responses and may be Ordered to pay sanctions to SCDA in the amount of \$7,200.00.

Due to the large amount of defendants in this matter and given the numerous motions to compel against other defendants that will be forthcoming, the Court has decided to reconsider the transfer of the case to Complex Litigation in the Los Angeles Superior Court, Central District located at 111 North Hill Street, Los Angeles, California 90012.

The Trial Court continued this matter until <u>February 9, 2012</u>, at 8:30 a.m. to determine whether this case will be transferred. The parties are required to appear in Department "NC-A" of the above-referenced court on the aforesaid date, for the Case Management Conference.







FOR IMMEDIATE RELEASE January 31, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

UNINCORPORATED ASSOCIATION'S SPONSORS SETTLE

GLENDALE, CALIF. January 31, 2012 — The matter of <u>Southern California Darts Association</u>, <u>Inc. v. L. David Irete, et al., Case No. LASC EC056642</u> brought against members of an unincorporated association and their eight sponsors reaches a close for the eight pubs.

Eads' Scarlet Lady, Inc. (dba Scarlet Lady Saloon) joins the ranks of the other seven pubs who reached a settlement agreement with SCDA.

The other seven pubs who have settled are listed as follows:

- 1. Defendant, HOLMAN ENTERPRISES, INC. (dba Pickwick's Pub);
- 2. Defendant, THE ROBIN HOOD PUB, INC. (dba Robin Hood British Pub);
- 3. Defendant, BUCHANAN ARMS, INC. (dba Buchanan Arms);
- 4. Defendant, YE OLDE KINGS HEAD, INC. (dba Ye Olde Kings Head British Pub);
- 5. Defendant, COCK 'N BULL (Sole Proprietorship);
- 6. Defendant, RAVAKEEN CORPORATION (dba Ireland's 32);
- 7. Defendant, INTREPID SLUG, INC. (dba Cat 'N Fiddle Pub & Restaurant).







FOR IMMEDIATE RELEASE February 06, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

INSIGHTFUL AND THOUGHTFUL QUERIES POSED TO SCDA

GLENDALE, CALIF. February 6, 2012 — Southern California Darts Association, Inc.'s President and CEO, Dino M. Zaffina received an e-mail which posed insightful and thoughtful queries. The e-mail was sent by Mr. Steve Millman on Sunday, February 5, 2012, at 5:08 a.m.

"Dino,

I read the story about how you took down this well established darting organization, because of a misspelling of your name. Is this true or was there more?

I look [sic] at the website you are constructing and it appears that a lot of thought and appreciation of darting went into it.

Many of our darters wonder what would motivate someone to destroy something enjoyed by many and I am wondering whether your motivation was to Build [sic] and improve, rather than destroy.

Thanks.

Steve Millman"

E-mail reply sent: Sunday, February 5, 2012, at 8:56 p.m.

Dear Mr. Millman:

I am in receipt of your e-mail dated February 5, 2012, at 5:08 a.m. sent to Southern California Darts Association, Inc. ("SCDA"). You pose insightful and thoughtful queries that I felt you deserve a response now, instead of waiting until our offices open on Monday.

Your first query is a compound question because you ask, "Is this true or was there more?" based on a general statement with many elements. I will provide you with all the same relevant

facts that were provided to Chris Vogel, journalist for the *LA Weekly*, but that were distorted and/or not used at all. For starters, however, <u>ALL my decisions were professional not personal</u>.

Clearly, Chris Vogel and the *LA Weekly* had an agenda (other than public concern) by writing this story, especially with the angle they used and making it a cover story. Nevertheless, they chose to publish their story. Sadly, notwithstanding the excellent talents of the aforementioned scribe, **the premise of the story is false** and most of the comments made therein by angry defendants are false, as well.

First, the title of the story is false. The title suggests, without providing one scintilla of evidence in the contents of the article, that I am angry. And, that somehow I brought down Southern California Darts Association (i.e., March 1, 1977, defunct corporation).

I was not angry and still am not angry at this unincorporated association ("UA") of dart players who continue to damage the reputation of the legal SCDA and its subsidiaries that I have a fiduciary duty to protect. Moreover, I did not bring down any organization. The leadership in 1977 and subsequent leaders of the UA for the past 34-years brought the association to its knees when the individuals with power failed to honor their "duty of loyalty" and "duty of care" to the association by failing to follow all of the laws prescribed by the federal, state, and local governments.

People should be asking Curtis N. Pierpont, Harvey M. Fischer, and Lewis D. Irete (a.k.a. L. David Irete), why "they" breached their fiduciary duty to the association of dart players. "That night at the Robin Hood, Irete, Harvey Fischer, Milan Sabata and Curtis Pierpoint ... all talked briefly about Zaffina's latest news. They, along with other players, decided there was nothing they could do about it right away, so they carried on with the planned administrative matters and league elections." [LA Weekly Article—February 3-9, 2012, Vol. 34, No. II, laweekly.com]. How foolish could leaders of an association be? Of course, there were many options at their disposal, including, but not limited to, (a) contacting SCDA to inquire as to the contents of the Press Release, (b) check the status of the UA on the California Secretary of State website, and (c) procure legal advice; call a lawyer immediately, so that the members would be protected. By their own words quoted in the article, "Fischer says, 'I kinda took it lightly." [LA Weekly Article, Ibid.]. That is terrible to do to people who appoint you to a position to protect their interest.

The same group of failed leaders were in possession of this knowledge just over one-year earlier (i.e., August 24, 2010) when I provided them with the information that they were an "illegal" association, and that they, were breaking federal, state, and local laws (including, but not limited to, the California Revenue and Tax Code § 19719(a) and Internal Revenue Code § 501(c)(3)), and that they could jeopardize members of their association and the businesses that sponsored their dart play. Their admission to how they reacted to this news was reported in the article, "Again, the unincorporated SCDA members largely ignored the message. 'In our minds,'

Cal. Revenue and Tax Code § 19719(a) "Any person who attempts or purports to exercise the powers, rights, and privileges of a corporation that has been suspended pursuant to Section 23301 or who transacts or attempts to transact intrastate business in this state on behalf of a foreign corporation, the rights and privileges of which have been forfeited pursuant to the section, is punishable by a fine of not less than two hundred fifty dollars (\$250) and not exceeding one thousand dollars (\$1,000), or by imprisonment not exceeding one year, or both fine and imprisonment.

Pierpoint says, ... 'We had been unincorporated for more than 30 years and were going along just fine as a club, and so when his letter came along, we didn't think much about it." [LA Weekly Article, Ibid.]

Who brought down the association? By Curtis N. Pierpont's <u>own admission</u>, "We had been <u>unincorporated for more than 30 years</u> and were going along just fine as a club, and so when <u>his letter came along, we didn't think much about it</u>." [LA Weekly Article, *Ibid.*]. The people that should be angry are the members of the association and the businesses that were <u>betrayed</u> <u>by Curtis N. Pierpont and others who breached their fiduciary duty</u>.

The betrayed members and businesses, should ask Curtis N. Pierpont, "Do you think that it is right to break laws (whether federal, state, or local)?" Curtis N. Pierpont's admissions are at minimum, an admission of negligence. Curtis N. Pierpont and other leaders' nonfeasance is what brought down the UA and their continued nonfeasance (as admitted above) is a contributing factor to why many individuals and businesses have been sued in the lawsuit entitled Southern California Darts Association, Inc. v. L. David Irete, et al. LASC Case No. EC056642.

Curtis N. Pierpont continues to explain how he and other individuals brought down the UA, "None of the darts [sic] players can recall why the SCDA decided in 1977 not to renew its corporate status. Pierpoint remembers that the issue came up a couple of times during the 1990s but was always voted down." [LA Weekly Article, Ibid.]. How could any intelligent person allow an association to continue for at minimum of the past 20-years, knowing that the association was lying to dart players, sponsors, and vendors by falsely representing that the organization was a "corporation" AND a "non-profit corporation" at that?

Curtis N. Pierpont continues, "We didn't see any real need in it,' he says. 'Yes, we probably should have filed taxes, but because we're mostly blue-collar knuckleheads who just want to drink beer and throw darts and have fun, we operate more like an informal club. It was ignorant bliss until Dino came along." [LA Weekly Article, Ibid.]. 'Yes, we probably should have filed taxes..." Do you think? Curtis N. Pierpont admits misfeasance by deliberately evading federal, state, and local tax liabilities on behalf of the UA. Does this self-described "knucklehead" realize how much civil and criminal penalties could be brought against ALL the past members of the UA for tax evasion? Not to mention, all the individual members and businesses who claimed their yearly membership and/or sponsor fees as a "charity" on their tax returns.

Curtis N. Pierpont continues to explain how he and other individuals brought down the UA, "[A]ccording to Pierpoint, (membership) swelled to nearly 5,000 members during the 1980s. The association sold merchandise, hosted two international tournaments and raked in nearly \$100,000 a year." [LA Weekly Article, Ibid.]. Mr. Pierpont, since the UA was not a legal corporation during the '80s and the UA was not a 501(c)(3), where did all the federal, state, and local tax money go? Moreover, where did all the sales and use tax money go that was to be paid to the California State Board of Equalization? Who brought down the association?

The anger is palpable, but it is not from me. It is fuming from the individuals and businesses that have been betrayed by Curtis N. Pierpont, Harvey M. Fischer, L. David Irete, Milan F. Sabata, and Patrick M. Montoya (a.k.a., Patrick Michaels), to name a few of the individuals who obviously breached their duty to the members of the UA, the sponsors, vendors, and the public.

The defendants in the above-entitled action, should be asking themselves, "Why did these guys get us into this much trouble?"

Second, you claim that my actions are somehow related to Harvey M. Fischer's deliberate misspelling of my name. <u>This is false</u>. Notwithstanding my assertion that my business decision to incorporate SCDA had absolutely nothing to do with my name, common sense and logic dictates that Chris Vogel and the prattlers in the article are spewing falsehoods regarding my name. Clearly, they are attempting to mask their own wrongdoing.

People should ask themselves, "If Dino M. Zaffina was so angry regarding his name being misspelled, why would he provide all the leaders and members of the UA with the knowledge that they were in violation of civil and criminal laws?" Moreover, "If Dino M. Zaffina wanted to bring down the UA, as alleged, why would he have waited over four-months to incorporate SCDA?" Common sense and logic dictates that I would have acted on the incorporation process of the SCDA immediately and stealthy. If I truly wanted to shut these individuals down, I could have done so in 2010. However, that was not my intent.

Third, you make the statement, "What would motivate someone to destroy something enjoyed by many." This statement, with all due respect, is false. There is zero evidence that I have destroyed anything. The aforementioned facts and evidence (e.g., admissions of liability by the aforementioned individuals) clearly establishes who destroyed the UA. The facts are recapitulated below.

<u>FACT</u>: The leaders of the UA admitted to knowing for a minimum of three decades that the association was operating illegally and that they evaded paying taxes.

<u>FACT</u>: The leaders and members of the UA were provided notice and ample time to reincorporate SCDA and to establish a 501(c)(3) with the federal government if they wanted to be a legal "nonprofit organization."

<u>FACT</u>: When the aforementioned leaders and members of the UA failed to establish the association as a legal entity, I decided, on behalf of SCDA, to acquire the corporate name, trade name, and service name of SCDA; in addition to other subsidiaries.

<u>FACT</u>: When the aforementioned leaders and members of the UA and sponsors failed to cease and desist their illegal activity after being warned numerous times over a one-month period, after the initial notice on August 29, 2011, I acted on behalf of SCDA, according to my fiduciary duty to the corporation and its shareholders, by bringing a legal action against all the tortfeasors.

<u>FACT</u>: I have not destroyed anything. In actuality, I have saved the good name of Southern California Darts Association, Inc. and its acronym SCDA from the destruction caused by Curtis N. Pierpont, Harvey M. Fischer, L. David Irete, Milan F. Sabata, Patrick Michaels, and others.

Fourth, you asked if my "motivation was to build and improve, rather than destroy." As a huge dart enthusiast since 2000, who during the years 2009 and 2010 played darts every night of those years at many different pubs from the San Fernando Valley, to the Westside, to the South Bay, and in Orange County, I think that my admiration for the game speaks for itself.

Prior to Harvey M. Fischer's <u>failed attempt</u> to force me out of the UA, I had discussed on many occasions ways that the association could be a "great" association. Unlike, L. David Irete, who is just a talker and not a doer; who has been claiming to be a promoter of darts since the 1970s, I actually act. As people know, I am a man of my word. If I say I will do something, you can count on it.

During my time playing in the UA, all I heard was disdain for Harvey M. Fischer. People could not stand him, his personality, the amateurish website that was the store front for the association, and his lack of competence with the teams' scores. Curtis N. Pierpont was not respected much more. Even his own teammates talked about how terrible he was as a President because he was a procrastinator. Look at his quotes above. He, like L. David Irete, talk a good story, but never get anything done. L. David Irete let it be known that he wanted to become President of the UA, but since the members just laughed at him because people say he is a joke, the chances that the UA would be a properly run business with L. David Irete at the helm was zero to nil. Proof is in how his failed leadership caused at minimum 85 defendants to be sued. A "good leader" would never have let an issue rise to the level of litigation.

Since most of the UA's members were wandering around aimlessly shooting dart matches, but unhappy with the way the association was being run, I assured many people in the association in all the pubs that I played at, that I would do whatever I could within my power and business skills to bring a level of professionalism to the association.

My goal regarding darts, since first acquiring a seat on the board of directors for the Pacific Darts Association ("PDA"), was to bring the game of darts out of the dark, noisy, and in some places, smoky pubs to the mainstream. Because of my decades of experience in the Motion Picture and Television Industry, I provided ideas on how cameras could be used to expose the excitement of darts in pubs and in peoples' homes.

Unfortunately, when one of my teammates, on a team that I sponsored, was threatened to death, during a match, by an ex-Marine on an opposing team, and Doug Tice, Richard Lawrence, Kim Bird, and other board members of the PDA refused to protect my player and other members of the PDA by reprimanding this assailant, I decided to act prudently and I immediately tendered my resignation from the board and pulled my sponsorship and team from the PDA.

Interestingly, Mr. Vogel failed to provide any evidence, including, but not limited to, alleged letters of threats of lawsuits by me against the PDA to support his accusations in the article; he decided to the tell the story differently. Fortunately, I saved every document that supports the truth of what actually occurred. Lawsuits were mentioned, but for the protection of the board of directors and the members of the association if this 5150 harmed anyone after the board, with the exception of me, ratified his criminal behavior. We all would have been sued.

Once I settled in with the UA, I offered many of the same suggestions and many new ones that I developed over the years. I informed many of the players on how we could bring a lot of money to the game and to the pubs, and how the money would bring excellent players to the association. Moreover, I offered ways that we could get nondart players in the pubs interested in being a devoted spectator and eventually a player.

I organized a system to acquire numerous sponsors, so that the winners of league matches and tournaments would receive more than a plaque or a mug. In addition, I conducted some polling to ascertain the interest of youths regarding the game of darts and it was overwhelmingly positive. I expressed an interest in the UA expanding the dart experience to teenagers and young adults, so that they would be groomed as dart players that would play in the UA once they reached 21.

I reached out to many of the good dart players in the UA to act as instructors for these young dart players and to act as mentors for teams that wanted to play in the UA, but hated being trampled on by the same group of players that are good and have been playing together for years.

Once the above-entitled lawsuit is over and the troublemakers are ordered by the Court to cease their unlawful behavior, SCDA will be able to commence operating in a way that the dart world has never seen before. SCDA will build a dart association that Southern California will be proud to host.

Mr. Millman, thank you for taking the time to write to me in regards to your concerns. I appreciate this opportunity to answer your queries. *Shoot well*!

Very truly yours,

Dino M. Zaffina, President and CEO Southern California Darts Association, Inc.







FOR IMMEDIATE RELEASE February 07, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

UNINCORPORATED ASSOCIATION ADMITS TO TAX EVASION

GLENDALE, CALIF. February 7, 2012 — A past darts association President <u>publicly admits to</u> <u>tax evasion</u> by the Unincorporated Association ("UA") who for more than three decades has been operating the "1977 defunct" Southern California Darts Association, Inc., Entity No. C0516738 ("Defunct SCDA") as a corporation and a nonprofit organization.

In an article published by *LA Weekly* from February 3-9, 2012, in Volume 34, No. II, and on www.laweekly.com, authored by journalist, Chris Vogel, Ex-President of the defunct corporation, *Curtis N. Pierpont*, a construction worker by trade, employed by *Mapco Construction*, *Inc.* in Canoga Park, California, admitted in Vogel's article that the defunct SCDA had not been a legal entity for more than 30-years and evaded paying taxes.

Pierpont was quoted as saying, "We had been unincorporated for more than 30 years and were going along just fine as a club" Pierpont continues his confession, "None of the darts [sic] players can recall why the SCDA decided in 1977 not to renew its corporate status. Pierpoint remembers that the issue came up a couple of times during the 1990s but was always voted down." Pierpont's sudden gush of honesty reached a climax when he admitted, "We didn't see any real need in it,' he says. 'Yes, we probably should have filed taxes....'" [LA Weekly Article, Ibid.].

Based on Pierpont's comments, the inexcusable tax evasion did not appear to be a minor oversight. "[A]ccording to Pierpoint, (membership) swelled to nearly 5,000 members during the 1980s. The association sold merchandise, hosted two international tournaments and raked in nearly \$100,000 a year." [LA Weekly Article, Ibid.].

Since the defunct SCDA was not a legal corporation during the '80s and the UA was not a 501(c)(3), where did all the federal, state, and local tax money go? Moreover, where did all the sales and use tax money go that was to be paid to the California State Board of Equalization?

Pierpont may be a "knucklehead" as he claimed in the article, but his excuse of ignorance will not fly with the government agencies, including, but not limited to, the IRS, California Franchise Tax Board, California State Board of Equalization, and the City of Los Angeles, because Pierpont's live-in girlfriend, Co-Defendant, **Debbie Lee Indrieri** is a Certified Public Account (California License No. 109632).







FOR IMMEDIATE RELEASE February 08, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

LA WEEKLY BLINDSIDED DINO M. ZAFFINA YET AGAIN

GLENDALE, CALIF. February 8, 2012 — Southern California Darts Association, Inc. took a beating from *LA Weekly* with the <u>95% false and one-sided story</u>, authored by Chris Vogel, published in its Volume 34, No. II, during February 3-9, 2012, and on <u>www.laweekly.com</u>.

SCDA's President and CEO, Dino M. Zaffina was misled by *LA Weekly*'s editor Sarah Fenske. Ms. Fenske informed Mr. Zaffina that he would have an opportunity to publish an "unedited" retort to the aforementioned article.

Clearly, Ms. Fenske intentionally derailed Mr. Zaffina's letter to the editor by including uncalled-for negative comments and in the case of Kim Bird (KimFromOC), board member of Pacific Darts Association, an out-and-out lie.

SCDA will be requesting a "fair and balanced" story published in the same manner as the vitriol launched by Mr. Vogel on behalf of some of the defendants in the lawsuit entitled <u>Southern California Darts Association, Inc. v. L. David Irete, et al.</u>







FOR IMMEDIATE RELEASE February 09, 2012

Contact: Publicity Department publicity@socaldartsassoc.com

BRINGING A BASELESS LAWSUIT RESULTS IN HEAVY COSTS

GLENDALE, CALIF. February 9, 2012 — Defendant, William F. Lynch in the action entitled Southern California Darts Association, Inc. v. L. David Irete, et al. found out the hard way that bringing a baseless lawsuit results in heavy costs; \$4,935.00 to be exact.

HERZFELD & RUBIN LLP ATTORNEYS AT LAW

7274

DATE

: Feb/ 7/2012

: 7274 INVOICE PAYMENT INVOICE

PAYMENT

CHE #

AMOUNT: \$4,500.00 02/07/12

: 4500.00

ACCOUNT: 7

PAID TO: Southern California Darts Association, I

5942 Edinger Ave., Suite 232

Huntington Beach

CA

92649

Other - Attorneys' Fees

VENDOR NAME: Southern California Darts Association, Inc.

VENDOR ACCT:

HERZFELD & RUBIN LLP ATTORNEYS AT LAW 1925 CENTURY PARK EAST SUITE 900 LOS ANGELES, CA 90067

CITY NATIONAL BANK SUNSET DOHENY 310 988-6800 9229 SUNSET BLVD W HOLLYWOOD, CA 90069 16-1606/1220

CHECK NO.

Four Thousand Five Hundred *************

DATE Feb/ 7/2012

***** 00/100

7274**7274**

PAY TO THE ORDER OF

Southern California Darts Association, I 5942 Edinger Ave., Suite 232 Huntington Beach, CA 92649

Other - Attorneys' Fees

"OO7274" :122016066: 009"624644"

\$4,500.00

AMOUNT

AUTHORIZED SIGNATURE

HERZFELD & RUBIN LLP ATTORNEYS AT LAW

DATE : Feb/ 7/2012

CHE # : 7272 INVOICE PAYMENT INVOICE PAYMENT

435.00

AMOUNT : \$435.00

ACCOUNT: 7

PAID TO: Dino M. Zaffina

5942 Edinger Ave., Suite 232

02/07/12

Huntington Beach

CA 92649

Other - Costs (Reimbursement for filing fee)

VENDOR NAME: Dino M. Zaffina

VENDOR ACCT:

7272 7272 **HERZFELD & RUBIN LLP** CITY NATIONAL BANK ATTORNEYS AT LAW CENTURY PARK EAST SUITE 900 SUNSET DOHENY 310-888-6800 9229 SUNSET BLVD W HOLLYWOOD, CA 90069 CHECK NO. LOS ANGELES, CA 90067 16-1608/1220 Four Hundred Thirty Five ******* ******* 00/100 DATE **AMOUNT** Feb/ 7/2012 \$435.00 Dino M. Zaffina 5942 Edinger Ave., Suite 232 Huntington Beach, CA 92649 Other - Costs (Reimbursement for filing fee) "OO7272" "122016066" 009"624643"

Self-proclaimed successful musician, Lynch was quoted by Chris Vogel in a *LA Weekly* article that ran from February 3-9, 2012, in Volume 34, No. II, and on www.laweekly.com, that "... he was furious that Zaffina was effectively destroying his beloved darts club." Lynch continued to prattle, he informed Vogel that, "He had plenty of money to hire attorneys and go toe-to-toe with Zaffina in court...." [LA Weekly Article, Ibid.].

No where in Vogel's smear campaign against SCDA and Mr. Zaffina did Lynch mention that it was he <u>and/or</u> other members of the club that "destroyed" the organization in 1977 when "those" members forced the California Franchise Tax Board ("FTB") to strip them of their *powers*, *rights*, and *privileges*.

Lynch would rather blame the "legal" SCDA or Mr. Zaffina instead of the club's incompetence in committing some violation that required the FTB to step in on March 1, 1977, and put a stop to Southern California Darts Association, Inc. for the next 33+ years, until Mr. Zaffina saved the organization by bringing the corporate entity legal again on January 3, 2011.

Vogel writes, "Lynch and his lawyer, Michael Zuk, went so far as to file a cross-complaint against Zaffina, essentially accusing him of blackmail. A judge, however, struck it down, ruling that there was 'no conclusive evidence of extortion." [LA Weekly Article, Ibid.]. And, that the law is palpably clear that everything Mr. Zaffina was doing on behalf of SCDA was "protected speech" under the U.S. and CA Constitution. The "checks" speak for themselves.