

Exhibit 21

1 ASHKAN RAJAEI
2 888 Prospect St, Unit 200
3 La Jolla, CA 92037
4 Telephone: 619-332-6348
5 Email: prayerforjustice.2022@gmail.com

6 Pro Se Plaintiff

7
8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
10

11 ASHKAN RAJAEI, an Individual,
12
13 Plaintiff,
14 v.

15 TYLER BRANDON DAVIS, an
16 Individual; SCOTT CARPENTER, an
17 Individual; J. DOUGLAS KIRK, an
18 Individual; *et al.*

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. 24CV0001-RSH-KSC
Assigned to Hon. Robert S. Huie,
Courtroom 3B

**TODD BELLUAMANI'S
DECLARATION IN SUPPORT OF
ASHKAN RAJAEI'S
OPPOSITION TO DEFENDANTS
SCOTT CARPENTER, AND
CUMMINS & WHITE, LLP,'S
MOTION TO DISMISS
PURSUANT TO FEDERAL
RULES OF CIVIL PROCEDURE
12(b)(1) AND 12(b)(6)**

Hearing Date: *March 4, 2024*

NO ORAL ARGUMENT UNLESS
REQUESTED BY COURT

Complaint Filed: January 2, 2024
Trial Date: None Set

1 I, Todd Belluomini, hereby declare as follows:

2 1. I am over 18 years old, and I am a resident in Winters, State of California. I
3 am not a party in this case. I am familiar with the matters described herein, and
4 if called as a witness to testify about them, I could and would do so.

5 2. I make this declaration in support of *Plaintiff Ashkan Rajae's Opposition to*
6 *Defendants Scott Carpenter, and Cummins & White, llp, 's Motion to Dismiss*
7 *Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).*

8 3. I was a member-owner of Porter Consulting, LLC, from 2017 to 2021 and a
9 member- owner of Mason Building & Design, LLC, from 2018 to 2021.

10 4. I was never told by Tyler Davis or Scott Carpenter about the arbitration
11 lawsuit Ashkan Rajae filed against Porter Consulting, LLC. I also was not
12 aware at the time that Scott Carpenter was filing motions in the arbitration to
13 have Porter Consulting, LLC dismissed from the lawsuit. I would have
14 intervened to keep Porter in the lawsuit, but I was kept in the dark about the
15 entire lawsuit, until Ashkan Rajae contacted me in August 2023.

16 5. As a member, I never received any tax return information or K1 from Porter
17 Consulting, LLC, despite repeated demands to Tyler Davis.

18 6. I was not aware until after the San Diego Judgment in Case No. 37 -2022-
19 00026691 that Tyler Davis had used Porter Consulting, LLC monies to invest
20 into TopDevz, LLC. I became aware after Ashkan Rajae showed me the Porter
21 Consulting, LLC bank statements. Tyler Davis has always deprived me of
22 access to the bank accounts of Porter Consulting, LLC.

23 7. I did not, and would not, have authorized the misappropriation of Porter's
24 partnership funds for a \$750,000 personal investment in TopDevz by Tyler
25 Davis. The \$750,000 did not belong to Tyler Davis; it belonged to Porter, and
26
27
28

1 Tyler took it by abusing his position and access, while concealing the
2 transactions from me.

3 8. At the time, I did not know Tyler Davis wrote a \$37,240 check on November
4 11, 2020, for a personal investment into TopDevz, LLC from Masons bank
5 account. Had I known, I would not have agreed to it. Tyler wrote and signed the
6 check by abusing his position and access and concealed the nature of
7 transactions from me in both our companies, Porter and Mason.

8 9. I was not aware until Ashkan Rajaei showed me TopDevz tax returns in late
9 August 2023, that Tyler Davis took a \$750,000 and \$37,240 personal tax credit
10 from funds belonging to Porter Consulting, LLC and Mason Building & Design.

11 10. In 2020, Tyler Davis obtained a PPP loan (Loan # 5058697106) without my
12 knowledge, and I had no idea he used \$37,240 of the PPP loan to Porter to
13 personally invest in TopDevz.

14 11. I had no idea at the time that Tyler re-paid Mason back with funds from
15 Porters PPP- Loan.

16 12. Scott Carpenter did not tell me about the subpoena in my name that Porter
17 Consulting, LLC had received while Scott Carpenter was representing the LLC.

18 13. Despite various requests from myself and my attorneys, Tyler Davis always
19 refused to provide me the financials of Porter Consulting, LLC. As I didn't want
20 to be implicated in anything Tyler was doing, I did not want to be liable for any
21 taxes Porter would owe and I was forced to relinquish my entire ownership
22 interest in Porter for nothing in 2021.

23 //

24 //

25 //

26 //

1 I declare under penalty of perjury under the laws of the State of California that
2 the foregoing is true and correct. Executed this 11th day of February, 2024 at
3 Winters California.

4
5
6  02/12/2024
7 Todd Belluomini (Declarant)