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7 Attorneys for Plaintiff,
EUGENE PROKHORENKO
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9 **THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF RIVERSIDE, MENIFEE JUSTICE CENTER**

11 EUGENE PROKHORENKO, an individual,
12
13 Plaintiff,

14 vs.

15 LA CRESTA PROPERTY OWNERS'
ASSOCIATION, a California Nonprofit
16 Corporation – Mutual Benefit – Common Interest
Development Corporation;
DOES 1 through 25 Inclusive

17 Defendant.
18

Case No.: CVME2404021

Assigned for All Purposes to:
Hon. Raquel A. Marquez
Department: M302

**DECLARATION OF AI LING LI IN SUPPORT
OF PLAINTIFF EUGENE PROKHORENKO'S
OPPOSITION TO LA CRESTA PROPERTY
OWNERS' ASSOCIATION'S MOTION FOR
SUMMARY ADJUDICATION**

Case Filed: October 16, 2024

Hearing Date: February 11, 2026
Hearing Time: 8:30 am

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22 **DECLARATION OF AI LING LI IN SUPPORT OF PLAINTIFF EUGENE**
23 **PROKHORENKO'S OPPOSITION TO LA CRESTA PROPERTY OWNERS'**
24 **ASSOCIATION'S MOTION FOR SUMMARY ADJUDICATION**

25 I, AI LING LI declare as follows:

26
27 1. This Declaration is given in support of Plaintiff's Opposition to Defendant's Motion for
28 Summary Adjudication. I have personal knowledge of the facts set forth in this declaration and if called

1 upon as a witness to testify, I could and would competently testify as to those facts under the penalty of
2 perjury.

3 2. I am a fairly new member of La Cresta Property Owners Association (LCPOA).

4 3. On August 7, 2025 I arrived to the LCPOA Open Session meeting at Wildomar City
5 Hall.

6 4. As the meeting progressed, discussions about the validity of the previous election results
7 were raised by Election Committee Chairman Mark McLeavy, who accused Director Tsun-I Wang and
8 others in the room of cheating in the election. Chaos erupted because regular attendees in support of
9 Board majority began applauding and laughing loudly to support Mr. McLeavy's false accusations.

10 5. I stood up to voice my opinion about what was happening. I said: "Even in Hong Kong
11 people do not behave like this. As Americans, we should be better than this." The man seated to my
12 right, identified as Vince Torre, said: "go back to Hong Kong". The chaos continued.

13 6. Wildomar law enforcement officer entered the room to establish order, warning us that if
14 further disruptions continued, LCPOA would no longer be welcome to use their facilities.

15 7. After the meeting had adjourned, Mr. Vincent Torre's wife, Cathy Shickora, approached
16 me with a group of women and in her usual intimidating manner told me to stop accusing her husband
17 and that he did not tell me to "go back to Hong Kong" despite being seated next to Mr. Torre during the
18 meeting, witnessing every word he said.

19 8. It is my testimony that everything in the video on this YouTube link is true and correct.
20 The woman in the blue t-shirt is me. (https://youtube.com/shorts/_nv11ojlhtI)

21 9. I was upset to have to experience this at our open meetings, where every LCPOA
22 member should have the right to attend to know what is going on in association from the Board and
23 participate in open meetings by expressing their rightful concerns without fear for their safety, fear of
24 intimidation and retribution.

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10. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed: 11 / 27 / 2025, in Murrieta, California.

By: *Ai Ling Li*
AILING LI

Respectfully Submitted,

Date: _____

By: *signed // Joseph Sarnowski //*
KIRK PEARSON
JOSEPH SARNOWSKI
Attorneys for Plaintiff, EUGENE PROKHORENKO

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Sent for signature to Ai Ling Li (gasoenwoo2@gmail.com) from
kschmidt@lscarlsonlaw.com
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VIEWED

11 / 27 / 2025

20:00:04 UTC

Viewed by Ai Ling Li (gasoenwoo2@gmail.com)
IP: 47.144.195.215



SIGNED

11 / 28 / 2025

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The document has been completed.