

DECLARATION OF DANIIL AGEEV UNDER PENALTIES OF PERJURY

Re: *Stanishevskaya v. AXXYEHHO LLC*, Case No. CACE-25-012484, Circuit Court of the Seventeenth Judicial Circuit, Broward County, Florida.

I, Daniil Ageev, declare the following facts based on my personal knowledge:

1. Operating Agreement and its purpose. I recognize the Operating Agreement of AXXYEHHO LLC effective September 13, 2019. I personally assisted Dr. Alexander E. Istomin in preparing it. We deliberately included Articles 4 and 5 to protect the Company against unauthorized changes in its ownership, management, and control, including corporate hijacking. Article 5 names me as the Designated Witness and requires, for the specified corporate actions, a written instrument signed by the Sole Member, attested by two adult witnesses including me, and acknowledged before a Florida notary.

2. Ekaterina Pushkarskaya. I never witnessed, signed, or approved any instrument appointing Ekaterina Pushkarskaya as a manager, member, agent, officer, or authorized representative of AXXYEHHO LLC, or transferring ownership or control to her. I did not participate in or authorize the January 14, 2021 Sunbiz filing by which she was inserted into the Company's management records.

3. Tatiana and Vasilii Pushkarskii. I never witnessed, signed, or approved any instrument appointing Tatiana Pushkarskaia or Vasilii Pushkarskii as a manager, member, agent, officer, or authorized representative of AXXYEHHO LLC. I never witnessed or approved any transfer of membership interests, amendment of the Operating Agreement, or authorization permitting either person to control or encumber Company property.

4. Fraudulent corporate takeover and efforts to protect the Company. During October and November 2025, while Dr. Istomin was in federal custody, I personally assisted him in investigating and challenging the fraudulent corporate takeover of AXXYEHHO LLC and the foreclosure proceedings involving Unit 709. I obtained, reviewed, organized, and forwarded corporate and court documents and helped Dr. Istomin prepare motions, appeals, and related submissions. My knowledge is based on my own participation, observations, communications, and documents I handled. Dr. Istomin sought to protect the Company, but his incarceration and lack of funds prevented him from retaining Florida counsel at that time. I assisted as much as possible, but could not represent the LLC in Florida court.

5. Contemporaneous evidence and contact. I have an electronic CamScanner copy of the Operating Agreement originating from a photograph made in 2019, before the challenged corporate filings. A copy is attached as Exhibit A. I am currently in Russia and can be contacted at [REDACTED] or [REDACTED]. I am available to speak with counsel regarding matters within my personal knowledge.

Verification: Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true. I further declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. (Fla. Stat. § 92.525; 28 U.S.C. § 1746.)

Executed: October 9, 2026, in Russia.

Electronic signature: /s/ Daniil Ageev

Daniil Ageev

EXHIBIT A — OPERATING AGREEMENT OF AXXYEHHO LLC

OPERATING AGREEMENT OF AXXYEHHO, LLC A Florida Limited Liability Company

Effective Date: September 13, 2019

This Operating Agreement is adopted effective September 13, 2019, by **ALEXANDER ISTOMIN MD**, residing at 3020 NE 32 AVE., 305, FORT LAUDERDALE, FL 33308 as the Sole Member of AXXYEHHO, LLC (the "Company").

ARTICLE 1 – FORMATION AND PURPOSE

1.1 The Company is formed under the Florida Revised Limited Liability Company Act. 1.2 **Purpose.** The Company is organized exclusively to acquire, own, hold, manage, lease, and dispose of real estate and to purchase, own, and lease medical equipment.

ARTICLE 2 – SOLE MEMBERSHIP AND MANAGEMENT

2.1 **Sole Membership.** Alexander Istomin MD is the Sole Member and owns 100% of the membership interests. 2.2 **Exclusive Management Authority.** The Sole Member has exclusive, complete, and irrevocable authority over all affairs of the Company.

ARTICLE 3 – RESTRICTIONS

3.1 No new Member may be admitted without the prior written consent of the Sole Member. 3.2 No membership interest may be transferred without a written instrument signed by the Sole Member.

ARTICLE 4 – AUTHORITY

4.1 No third party may file documents with SunBiz or bind the Company unless expressly appointed in writing by the Sole Member. Mere public filing does not create authority. 4.2 Any manager or agent requires a written appointment by the Sole Member. 4.3 Self-dealing or use of Company property is prohibited without the Sole Member's prior express written consent.

ARTICLE 5 – DESIGNATED WITNESS AND ANTI-FORGERY FORMALITIES

5.1 **Designated Witness.** The Sole Member designates **DANIIL AGEEV** as the "Designated Witness". This person must serve as one of the two required witnesses for all critical actions. 5.2 **Mandatory Formalities** The following actions require a written instrument signed by the Sole Member and executed with these formalities:

- Admission of any new Member
- Any transfer of membership interest
- Any amendment to this Agreement
- Appointment of any manager, agent, or authorized representative
- Any consent to self-dealing or use of Company assets

Required Formalities: (a) Signed by the Sole Member; (b) Attested by two (2) adult witnesses, one of whom must be the Designated Witness named above; (c) Acknowledged before a Florida notary public. Any document that does not comply with these formalities is null and void.

ARTICLE 6 – MISCELLANEOUS

6.1 This Agreement is governed by Florida law. 6.2 This Agreement constitutes the entire agreement. **Adopted by the Sole Member:**

Signature: 

Printed Name: Alexander Istomin MD

Date: September 13, 2019