

Kevin: Realworldfare (formerly Kevin: Walker)
C/o 30650 Rancho California Road # 406-251
Temecula, California
non-domestic without the United States
Email: team@walkernovagroup.com

Secured Party, Fiduciary, Executor, and Authorized Representative,
for the Plaintiffs/Secured Parties,
™WG PRIVATE IRREVOCABLE TRUST©, ™WG EXPRESS© TRUST

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE**

**WG PRIVATE IRREVOCABLE TRUST,
WG EXPRESS TRUST,**

Plaintiffs,

vs.

**MARINAJ PROPERTIES LLC; and ALL
PERSONS UNKNOWN CLAIMING
ANY LEGAL OR EQUITABLE RIGHT,
TITLE, ESTATE, LIEN, OR INTEREST
IN THE PROPERTY DESCRIBED IN
THIS COMPLAINT ADVERSE TO
PLAINTIFFS' TITLE, OR ANY CLOUD
UPON PLAINTIFFS' TITLE THERETO,**

Defendants,

Case No. CVME2504043

**VERIFIED MOTION AND DEMAND FOR
SANCTIONS UNDER CALIFORNIA CCP
§ 128.7 AND RULE 11, FEDERAL RULES
OF CIVIL PROCEDURE, WITHOUT
HEARING, AS A MATTER OF LAW
(SPECIAL LIMITED APPEARANCE —
EQUITY JURISDICTION PRESERVED)**

TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:

COMES NOW, Plaintiffs, ™WG PRIVATE IRREVOCABLE TRUST© and ™WG
EXPRESS© TRUST (hereinafter "Plaintiffs," "Secured Parties," and/or "Real Parties
in Interest"), by *Special Limited Appearance*, **not** generally, by and through their
duly appointed *Fiduciary, Executor, and Authorized Representative*, Kevin:
Realworldfare, who also specially appears by *Special Limited Appearance* only, **not**
pro se, and expressly *without waiver of any rights, immunities, or protections*.
Said *Special Limited Appearance* is made exclusively in **private capacity**, in

1 **exclusive equity**, as *Secured Parties, Holders in Due Course, Executors, Master*
2 *Beneficiaries*, and *Fiduciaries* of the respective Trust Estates as lawfully established
3 and recorded.

4 **I. GROUNDS FOR MOTION AND DEMAND**

5 The basis for this Motion and Demand for Sanctions includes, but is not limited to,
6 the following egregious acts and bad faith conduct by MARINAJ PROPERTIES LLC
7 and its counsel of record:

- 8 **1. Filing of a facially defective and factually unsupported Cross-Complaint**,
9 previously rejected by the Court, which contained no verified facts, standing, or
10 admissible evidence capable of rebutting the perfected and un rebutted interests
11 of Plaintiffs and/or Secured Parties;
- 12 **2. Fraudulent assertion of a "Notice of Related Case"**, improperly filed to
13 simulate procedural connection and legal standing, with the intent to obstruct
14 the adjudication of a perfected quiet title action and to delay remedy through
15 simulated process;
- 16 **3. Unauthorized use of protected and trademarked entities and names**, including
17 "™KEVIN WALKER©," "™DONNABELLE MORTEL©," and various trust
18 entities, in direct violation of the Trademark and Copyright Protection
19 Agreement on file (Exhibits R and U), resulting in enforceable commercial
20 damages now exceeding **\$12,000,000.00**;
- 21 **4. Fraud upon the Court** by knowingly initiating and prosecuting claims with no
22 lawful standing, no lawful chain of title, and in complete disregard of verified
23 affidavits, perfected commercial instruments, and lawful notices of default,
24 dishonor, and cure opportunity;
- 25 **5. Ongoing procedural abuse, constructive fraud, and simulated legal process**,
26 including obstruction of due process and remedy, and willful attempts to cloud
27 perfected title and interfere with trust-based administration and equitable estate
28 rights;

6. Violation of Rule 8.4 of the California Rules of Professional Conduct,

including but not limited to:

- **Rule 8.4(c):** Engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation;
- **Rule 8.4(d):** Engaging in conduct prejudicial to the administration of justice;
- **Rule 8.4(g):** Knowingly assisting a client or third party in violating applicable laws or fiduciary duties;

7. Slander of title, fraudulent conveyance, identity theft, and breach of trust, as

well as participation in simulated unlawful detainer filings while title remains in dispute and un rebutted affidavits establish perfected ownership by Plaintiffs;

8. Commercial dishonor and bad faith litigation tactics, including refusal to

respond to registered and electronic service of lawful documents, unjustified denial of notarized and recorded instruments, and willful dishonor of the affidavit process in violation of UCC §§ 2-201, 3-505, and principles of equity;

9. Intentional delay and obstruction of justice, causing irreparable harm to

Plaintiffs and/or Secured Parties in the amount of **\$10,000.00 per day**, continuing until full discharge, settlement, and correction of the record.

These actions collectively constitute a fraud upon the Court, a breach of public trust, and a concerted attempt to unlawfully cloud title, suppress remedy, and violate the secured, trust-based, and private rights of the Plaintiffs and/or Secured Parties

II. NOTICE OF CONSEQUENCES AND FEDERAL ESCALATION

Failure to lawfully honor or rebut this Verified Motion and Demand for Sanctions shall constitute additional dishonor, procedural obstruction, and ultra vires conduct, triggering immediate escalation to federal jurisdiction. Plaintiffs and/or Secured Parties hereby give final notice of intent to:

- **Remove this matter to the United States District Court** under the following provisions:

- 28 U.S.C. § 1331 (Federal Question Jurisdiction),
- 28 U.S.C. § 1332 (Diversity of Citizenship and Amount in Controversy),
- 28 U.S.C. § 1343 (Civil Rights Jurisdiction),
- 28 U.S.C. § 1361 (Writ of Mandamus),
- 28 U.S.C. § 1441 (General Removal Statute),
- 28 U.S.C. § 1443 (Removal for Civil Rights Violations).
- **File a separate federal civil and commercial action** alleging the following statutory violations and private rights of action:
 - 18 U.S.C. § 1962 – Racketeer Influenced and Corrupt Organizations Act (RICO),
 - 18 U.S.C. § 1341 – Mail Fraud,
 - 18 U.S.C. § 1343 – Wire Fraud,
 - 18 U.S.C. § 241 – Conspiracy Against Rights,
 - 18 U.S.C. § 242 – Deprivation of Rights Under Color of Law,
 - 42 U.S.C. § 1983 – Civil Rights Deprivation and Abuse of Authority,
 - 15 U.S.C. § 1125 – Trademark Infringement and False Designation of Origin,
 - 17 U.S.C. § 501 – Copyright Infringement,
 - 18 U.S.C. § 2314 – Transportation of Stolen Property,
 - 18 U.S.C. § 872 – Extortion by Officers or Persons in Official Capacity,
 - 18 U.S.C. § 513 – Forgery of Securities and False Instruments,
 - 18 U.S.C. § 1001 – False Statements in a Matter Within Federal Jurisdiction.

Any refusal by this Court to act upon this Verified Motion and Demand in accordance with **equity, commercial law, and constitutional due process** will be construed as:

- An **ultra vires act** (beyond jurisdictional authority),
- **Judicial fraud by accommodation** of simulated legal process,

- And a **willful deprivation of rights under color of law**, actionable per se under 42 U.S.C. § 1983.

All rights expressly reserved *without* prejudice, under UCC 1-308, **nunc pro tunc, ab initio**.

III. FINAL NOTICE OF DUTY TO ACT AND ESTOPPEL BY SILENCE

This Verified Motion and Demand for Sanctions is submitted upon verified commercial affidavits, perfected security interests, and an unrebutted record of **dishonor and fraud**. Pursuant to California Code of Civil Procedure § 128.7(c), Rule 11 of the Federal Rules of Civil Procedure, and established commercial and equity principles, this Court is required to adjudicate this matter **strictly as a matter of law** based on the perfected record before it.

No hearing is necessary, proper, or authorized where there exists no material dispute of fact, and where the parties in question remain in dishonor, having failed to rebut any verified claim, affidavit, or lawful commercial tender with a sworn, point-for-point response under penalty of perjury, supported by lawful evidence.

Should this Court delay, ignore, or refuse to lawfully dispose of this Motion on the record, such conduct shall constitute:

- **Final dishonor and tacit acquiescence** to all unrebutted facts and verified claims;
- An **ultra vires act**, operating beyond any lawful jurisdiction or judicial discretion;
- **Fraud by judicial accommodation**, in furtherance of simulated process;
- And **estoppel by silence**, invoking liability under commercial law, equity, and federal civil rights law.

This matter is now perfected and submitted *without waiver*, by *Special Limited Appearance* only, not generally, and all rights, protections, and standing are **expressly reserved** under UCC 1-308, *without* prejudice, **nunc pro tunc, ab initio**.

IV. DEMAND FOR RELIEF AND EQUITABLE CORRECTION OF RECORD

Plaintiffs and/or Secured Parties, appearing strictly by Special Limited Appearance and in fiduciary, trustee, and secured capacities only, hereby demand the following lawful and equitable relief, based on the verified commercial record, un rebutted affidavits, and perfected filings now before this Court:

- 1. That MARINAJ PROPERTIES LLC and their counsel of record be sanctioned** for willful fraud upon the court, abuse of judicial process, obstruction of remedy, and repeated violations of procedural integrity, resulting in irreparable injury and commercial harm;
- 2. That monetary sanctions in the amount of no less than \$1,000,000.00 be issued,** reflecting the fiduciary labor, administrative expense, commercial enforcement costs, and reputational injury incurred by Plaintiffs and/or Secured Parties in defending against the knowingly fraudulent Cross-Complaint, bad faith “Notice of Related Case,” and ongoing dishonor;
- 3. That the Court issue a formal reprimand, censure, or referral for State Bar investigation** pursuant to Rule 8.4 of the California Rules of Professional Conduct, against all attorneys knowingly participating in conduct involving fraud, deceit, misrepresentation, and prejudicial interference with justice;
- 4. That the fraudulent pleadings and filings of MARINAJ PROPERTIES LLC be stricken in full, with prejudice,** and that a permanent bar be imposed prohibiting the re-filing of any action involving the subject property unless and until supported by verified, lawful, and rebuttable evidence of superior title or secured interest;
- 5. That judicial notice be taken of this Motion, all exhibits, and all un rebutted affidavits on file,** to be incorporated into all future proceedings and filings, including any removal, federal escalation, or mandamus action, due to the continuing pattern of simulated process, procedural fraud, and bad faith litigation by MARINAJ PROPERTIES LLC and their counsel;

6. That all unauthorized uses of protected and trademarked names and entities by MARINAJ and their counsel be acknowledged as commercial trespass and copyright violation, and that corresponding damages exceeding \$12,000,000.00 in statutory and commercial liability be acknowledged as enforceable and pending lien execution;

7. That this Court affirm and preserve all equitable, secured, and recorded interests held by the private trust Plaintiffs, perfected and unrebutted under law, and issue further orders as necessary to restore equity, protect lawful title, and deter additional abuse of process.

This Demand is made strictly in good faith, under reservation of rights, and under equity and commercial law, *without* waiver, **nunc pro tunc, ab initio**, UCC 1-308

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VERIFICATION:

Pursuant to 28 U.S.C. § 1746

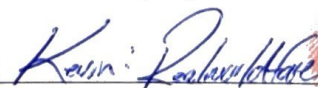
BY AUTHORIZED REPRESENTATIVE WITH FIRSTHAND KNOWLEDGE

I, Kevin Realworldfare, over the age of 18, competent to testify, and having firsthand knowledge of the facts stated herein, do hereby **declare, certify, verify, affirm, and state** under penalty of perjury under the laws of the United States of America, that the foregoing statements are **true, correct, and complete**, to the best of my **understanding, knowledge, and belief**, and made in **good faith**.

Executed, signed, and sealed this 14th day of May in the year of Our Lord two thousand and twenty five, *without* the United States, **with all rights reserved and without recourse and without prejudice**.

All rights reserved without prejudice or recourse, UCC § 1-308, 3-402.

By:



Kevin: Realworldfare, Secured Party, Fiduciary,
Authorized Representative, Executor

Let this document stand as truth before the Almighty Supreme Creator and let it be established before men according as the scriptures saith: *"But if they will not listen, take one*

or two others along, so that every matter may be established by the testimony of two or three witnesses." Matthew 18:16. "In the mouth of two or three witnesses, shall every word be established" 2 Corinthians 13:1.

All rights reserved without prejudice or recourse, UCC § 1-308

By: Corey Dabill Walker
Corey Walker (Witness)

All rights reserved without prejudice or recourse, UCC § 1-308

By: Donnabelle Realworldfare
Donnabelle: Realworldfare (Witness)

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LIST OF EXHIBITS / EVIDENCE:

1. **Exhibit A:** GRANT DEED recorded in Official Records County of Riverside, DOC #2024-0291980, APN: 957-570-005, File No.: 37238 KH, where the private trust property is titled to 'WG Private Irrevocable Trust, dated February 7, 2022'.
2. **Exhibit B:** UCC1 filing #2024385925-4.
3. **Exhibit C:** UCC1 filing #2024385935-1.
4. **Exhibit D:** UCC3 filing and NOTICE #2024402433-7.
5. **Exhibit E:** UCC3 filing and NOTICE #2024411182-7.
6. **Exhibit F:** GRANT DEED, DOC #2022-0490841, APN: 957-570-005, File No.: 30291 KH, recorded in Official Records County of Riverside.
7. **Exhibit G:** Affidavit and Contract and Security Agreement #EI988807156US.
8. **Exhibit H:** Affidavit and Contract and Security Agreement #RF775822865US.
9. **Exhibit I:** Affidavit and Contract and Security Agreement #RF775823755US.
10. **Exhibit J:** Contract and Security Agreement / Affidavit Certificate of Dishonor, Non-response, DEFAULT, JUDGEMENT, and LIEN AUTHORIZATION and LIEN AUTHORIZATION, #RF775824288US.
11. **Exhibit K:** Form 3811 corresponding to Exhibit G.
12. **Exhibit L:** Form 3811 corresponding to Exhibit H.

- 1 13. **Exhibit M:** Form 3811 corresponding to Exhibit I.
- 2 14. **Exhibit N:** Form 3811 corresponding to Exhibit J.
- 3 15. **Exhibit O:** Trust Certificate of WG PRIVATE IRREVOCABLE TRUST.
- 4 16. **Exhibit P:** Affidavit: Power of *Attorney-In-Fact*
- 5 17. **Exhibit Q:** **Contract** and Security Agreement / **Affidavit Certificate** of Dishonor,
6 Non-response, DEFAULT, JUDGEMENT, and LIEN AUTHORIZATION and
7 **LIEN AUTHORIZATION, #RF661592201US.**
- 8 18. **Exhibit R:** TMKEVIN WALKER© Trademark and Copyright Agreement
- 9 19. **Exhibit S:** TMDONNABELLE MORTEL© Trademark and Copyright Agreement
- 10 20. **Exhibit T:** Copy of Rule 8.4 Misconduct Approved by the Supreme Court.
- 11 21. **Exhibit U:** Copy of Defendants **defective and fraudulent** CROSS-COMPLAINT
- 12 22. **Exhibit V:** Copy of VERIFIED RESPONSE, *CONDITIONAL* ACCEPTANCE,
13 AND MOTION AND DEMAND TO STRIKE CROSS-COMPLAINT, SANCTION
14 COUNSEL FOR FRAUD, AND QUIET TITLE IN FAVOR OF PLAINTIFFS, as a
15 matter of law (Express Mail #ER192833495US).
- 16 23. **Exhibit W:** Copy of NOTICE OF RETURN of Defendants defective CROSS-
17 COMPLAINT.
- 18 24. **Exhibit X:** Proof of delivery of 'VERIFIED RESPONSE..' (Exhibit V) to Court.
- 19 25. **Exhibit Y:** Email correspondence from John Bailey and Barry Lee O'Connor
20 showing their clear **evasion, bad faith, and dishonor.**
- 21 26. **Exhibit Z:** Copy of GEORGIA'S OWN CREDIT UNION'S Request to Dismiss
- 22 27. **Exhibit AA:** [PURPORTED] '*DEFENDANTS' VERIFIED RESPONSE AND*
23 *DEMAND FOR DISMISSAL OF FRAUDULENT UNLAWFUL DETAINER AND*
24 *SANCTIONS AGAINST PLAINTIFF AND DEMAND FOR CONSIDERED AND*
25 *STIPULATED JUDGEMENT, AND DEMAND FOR QUIET TITLE AND*
26 *DEMAND FOR SUMMARY JUDGMENT IN FAVOR OF DEFENDANTS, AS A*
27 *MATTER OF LAW*'
- 28 //

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF RIVERSIDE)

I competent, over the age of eighteen (18) years, and not a party to the within action. My mailing address is the Walkernova Group, care of: 30650 Rancho California Road suite #406-251, Temecula, California [92591]. On or about **May 15, 2025**, I served the within documents:

1. **VERIFIED MOTION AND DEMAND FOR SANCTIONS UNDER CALIFORNIA CCP § 128.7 AND RULE 11, FEDERAL RULES OF CIVIL PROCEDURE, WITHOUT HEARING, AS A MATTER OF LAW.**

By United States Mail. I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses listed below by placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepared. I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail in Riverside County, California, and sent via Registered Mail with a form 3811.

Clerk(s), Agent(s)
C/o **CLERK OF COURT**
27401 Menifee Center Drive
Menifee, California [92584]
Express Mail #ER192833399US

Naji Doumit, Mary Doumit, Daniel Doumit
C/o **NAJI DOUMIT, MARINAJ PROPERTIES, FOCUS ESTATES INC**
1130 South Tamarisk Drive
Anaheim, California [92807]
Registered Mail #RF775825819US

John L. Bailey (#103867), Therese Bailey (#171043)

C/o THE BAILEY LEGAL GROUP
25014 Las Brisas South, Suite B
Murrieta, California [92562]
Registered Mail #RF775825822US

Barry-Lee: O'Connor
C/o BARRY LEE O'CONNOR, BARRY LEE O'CONNOR & ASSOCIATES
3691 Adams Street
Riverside, California [92504]
Registered Mail #RF775825836US

By Electronic Service. Based on a court order and/or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below.

Naji Doumit, Mary Doumit, Daniel Doumit
C/o NAJI DOUMIT, MARINAJ PROPERTIES, FOCUS ESTATES INC
1130 South Tamarisk Drive
Anaheim, California [92807]
udlaw2@aol.com
louisatoui3@yahoo.com
najidoumit@gmail.com

John L. Bailey (#103867), Therese Bailey (#171043)
C/o THE BAILEY LEGAL GROUP
25014 Las Brisas South, Suite B
Murrieta, California [92562]
jbailey@tblglaw.com
tbailey@tblglaw.com

Barry-Lee: O'Connor (#134549)
C/o BARRY LEE O'CONNOR, BARRY LEE O'CONNOR & ASSOCIATES
3691 Adams Street
Riverside, California [92504]
udlaw2@aol.com
louisatoui3@yahoo.com

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **May 14, 2025** in Riverside County, California.

/s/Corey Walker/
Corey Walker

NOTICE:

Using a notary on this document does *not* constitute joinder adhesion, or consent to any foreign jurisdiction, *nor does it alter my status in any manner*. The purpose for notary is verification and identification only and not for entrance into any foreign jurisdiction.

ACKNOWLEDGEMENT:

State of California)

) ss.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

County of Riverside)

On this 14th day of May, 2025, before me, Joyti Patel, a Notary Public, personally appeared Kevin Realworlfare (formerly Kevin Walker), who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Joyti Patel (Seal)

