

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/Real Parties In Interest/
Secured Parties,*

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
SUMMARY DISPOSITION, JUDICIAL
ESTOPPEL, STRIKING OF DEFECTIVE
CROSS-COMPLAINT, AND ENTRY OF
DEFAULT AND **SANCTIONS** FOR
DEFENDANTS' DISHONOR, FRAUD,
UNCLEAN HANDS, AND BAD FAITH,
WITHOUT HEARING AS A MATTER OF
LAW

(SPECIAL LIMITED APPEARANCE —
EQUITY JURISDICTION PRESERVED)

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. Kevin: Realworldfare, specially appears in **private capacity only**,
not pro se, and expressly without waiver of any rights, immunities, or protections.
This *Special Limited Appearance* is made exclusively in equity, in the capacity of
Secured Party, Holder in Due Course, Executor, Master Beneficiary, and

Fiduciary of the above-referenced Trust Estates, as lawfully established and perfected on the public and commercial record.

**I. VERIFIED RESPONSE AND JUDICIAL RECORD CONTROL,
AND DEFENDANTS' DISHONOR, BAD FAITH, AND
PROCEDURAL ESTOPPEL**

The timeline of filings demonstrates a clear and continuous pattern of **dishonor, unclean hands, procedural manipulation, and fraud upon the court** by MARINAJ PROPERTIES LLC and its counsel. The following filings, all made by Plaintiffs between May 12 and May 19, 2025, remain unrebutted and legally controlling:

1. Filed – May 12, 2025:

VERIFIED RESPONSE, CONDITIONAL ACCEPTANCE, AND MOTION AND DEMAND TO STRIKE CROSS-COMPLAINT, SANCTION COUNSEL FOR FRAUD, AND QUIET TITLE IN FAVOR OF PLAINTIFFS – Establishes verified rebuttal, conditional acceptance, and demand for dismissal of the unverified and unauthorized Cross-Complaint.

2. Filed – May 13, 2025:

NOTICE OF VERIFIED CONDITIONAL ACCEPTANCE OF SCHEDULED HEARING UPON VERIFIED PROOF OF MATERIAL DISPUTE, PROCEDURAL NECESSITY, ABSENCE OF DEFENDANT'S DISHONOR, AND LAWFUL BASIS – Accepts only upon verified proof of standing and title, which Defendants have failed to produce.

3. Filed – May 13, 2025:

MOTION FOR JUDGMENT ON THE PLEADINGS on the Complaint for Quiet Title – Signals that Plaintiffs are actively moving for adjudication on the merits, supported by unrebutted evidence.

4. Filed – May 14, 2025:

NOTICE OF VERIFIED CONDITIONAL ACCEPTANCE OF SCHEDULED HEARING UPON VERIFIED PROOF OF MATERIAL DISPUTE,

PROCEDURAL NECESSITY, ABSENCE OF DEFENDANT'S DISHONOR, AND LAWFUL BASIS (second iteration) – Maintains control of record and reiterates the legal terms under which any hearing is conditionally accepted.

5. Filed – May 14, 2025:

MOTION FOR SANCTIONS – Cites fraudulent conduct, dishonor, and improper filings by MARINAJ and their counsel.

6. Filed – May 14, 2025:

VERIFIED NOTICE, CONDITIONAL ACCEPTANCE, REBUTTAL, MOTION AND DEMAND TO STRIKE FRAUDULENT “RELATED CASE” DESIGNATION – Directly rebuts MARINAJ’s notice of related case and demands sanctions for false designation and bad faith.

7. Filed – May 16, 2025:

NOTICE OF VERIFIED CONDITIONAL ACCEPTANCE OF SCHEDULED HEARING FOR SANCTIONS HEARING AGAINST DEFENDANTS AND THEIR COUNSEL – Accepts hearing only under lawful terms, reinforcing that no adjudication has yet legitimized MARINAJ’s Cross-Complaint.

8. Filed – May 19, 2025:

VERIFIED NOTICE OF DEFENDANTS’ FRAUD, BAD FAITH, UNCLEAN HANDS, AND PROCEDURAL BAR TO EX PARTE RELIEF, AND CONDITIONAL ACCEPTANCE OF EX PARTE RELIEF – This filing, made immediately before MARINAJ’s retroactively docketed Cross-Complaint was entered, seals the procedural record with a sworn rebuttal and legal bar to any relief absent full compliance with law and due process.

These filings confirm:

- **Defendants are in continuing dishonor;**
- **They have failed to rebut any verified affidavits or conditional acceptances;**

- 1 • **All procedural authority remains with the Plaintiffs**, and the court is
2 estopped from granting relief based on an unverified, procedurally defective
3 Cross-Complaint;
- 4 • **Judicial estoppel and summary disposition are appropriate remedies** at this time.

5 **II. FACTUAL BASIS FOR SUMMARY DISPOSITION**

- 6 1. **The Defendants remains in dishonor and default as evidenced** by the
7 **unrebutted** affidavits and contract and security agreements (Exhibits G, H, I, and
8 J), and the Defendants are presumed in dishonor.
- 9 2. Plaintiff is the undisputed Real Party in Interest, Secured Party, Creditor, and
10 Holder in Due Course under U.C.C. §§ 3-302 and 3-306, possessing lawful claim
11 over all assets – registered and unregistered, tangible and intangible – and
12 holding allodial title to the subject property. This standing is evidenced by the
13 following UCC filings with the Nevada Secretary of State: UCC-1 filings
14 #2024385925-4 and #2024385935-1, and UCC-3 Amendments #2024402433-7 and
15 #2024411182-7. (See Exhibits B, C, D, and E).
- 16 3. As established and evidenced by the perfected UCC filings, the **Deed of Trust**
17 and the underlying **Note/Negotiable Instrument** have been lawfully **accepted,**
18 **securitized, and discharged** in accordance with applicable commercial law. Any
19 alleged obligation has been fully extinguished by operation of law, and no
20 lawful debt remains.
- 21 4. The public filing of said instruments evidences Plaintiff's lawful right to the
22 property as secured party creditors, enforceable against all third parties,
23 including trustees, lenders, "servicers," and purported beneficiaries.
- 24 5. Plaintiffs, having fulfilled all relevant obligations and lawfully perfected their
25 interest as secured parties, now hold a **superior, enforceable, and exclusive**
26 **claim** to the subject property, free and clear of any adverse or competing claims.
27 Their perfected legal and equitable interest is a matter of public record and
28 remains unchallenged.

6. On **December 5, 2022**, a **GRANT DEED** (DOC #2022-0490841, File No.: 30291 KH) was recorded in the **Official Records of Riverside County** for APN: **957-570-005**. (See Exhibit F)
7. On **September 27, 2024**, a **GRANT DEED** (DOC #2024-0291980, File No.: 37238 KH) was recorded in the **Official Records of Riverside County** for APN: **957-570-005**. (See Exhibit A)
8. On **February 13, 2024**, Plaintiffs duly filed a **UCC-1 Financing Statement** and **Notice** Filing No. **2024385925-4** , with the Secretary of State of Nevada, thereby further perfecting and providing public notice of their secured interest in the subject property. (See Exhibit B)
9. On **February 13, 2024**, Plaintiffs duly filed a **UCC-1 Financing Statement** and **Notice** Filing No. **2024385935-1**, with the Secretary of State of Nevada, thereby further perfecting and providing public notice of their secured interest in the subject property. (See Exhibit C)
10. On **April 30, 2024**, Plaintiffs duly filed a **UCC-3 Amendment and Notice**, Filing No. **2024402433-7**, with the Secretary of State of Nevada, thereby further perfecting and providing public notice of their secured interest in the subject property. (See Exhibit D)
11. On **June 15, 2024**, Plaintiffs duly filed a **UCC-3 Amendment and Notice**, Filing No. 2024411182-7, with the Secretary of State of Nevada, thereby further perfecting and providing public notice of their secured interest in the subject property. (See Exhibit E)
12. On **January 17, 2025**, a purported **Trustee's Deed Upon Sale** (Document No. 2025-0017386) was fraudulently recorded in the official records. Said instrument is **void ab initio**, as the party executing the alleged transfer lacked both **lawful title** and **legal authority** to convey any interest in the subject property, rendering the deed legally null and without force or effect.
13. Any **deed** — including, but not limited to, a '**TRUSTEE'S DEED UPON SALE**' (Doc. #2025-0017386) — presently in the **Plaintiffs' possession** constitutes

a product of **fraud** and is therefore **null and void *ab initio***, having absolutely no legal force or effect.

14. No transfer or assignment of title has occurred since the recording of GRANT DEED #2024-0291980 on September 27, 2024.

15. The **private trust property** *remains private trust property* and is the property of an **irrevocable, non-statutory** trust.

16. No judicial foreclosure or court order authorized the sale. Any non-judicial attempt to extinguish Plaintiffs' equitable title without due process is constitutionally defective and void.

17. On or about **March 16, 2025**, Defendants **fraudulently** filed an Unlawful Detainer (UDME2500465), despite the existence of a superior, pending quiet title action and in full knowledge of Plaintiff's **perfected** legal and equitable interest in the subject property. This act constituted procedural fraud, commercial dishonor, and a willful attempt to simulate jurisdiction and harass the true title holders.

18. On or about **March 22, 2025**, Plaintiffs and/or Secured Parties, as defendants in the Unlawful Detainer case (UDME2500465), filed their "**VERIFIED RESPONSE AND DEMAND FOR DISMISSAL OF FRAUDULENT UNLAWFUL DETAINER AND SANCTIONS AGAINST PLAINTIFF AND DEMAND FOR CONSIDERED AND STIPULATED JUDGMENT, AND DEMAND FOR QUIET TITLE AND DEMAND FOR SUMMARY JUDGMENT IN FAVOR OF DEFENDANTS, AS A MATTER OF LAW.**" Said filing stands **unrebutted**, conclusively challenging the UD court's jurisdiction and **extinguishing any viable claim therein**. The Unlawful Detainer action was thereby rendered moot and **void *ab initio***.

19. On or about **April 16, 2025**, Plaintiffs and/or Secured Parties lawfully filed the **Verified Quiet Title Action (Case No. CVME2504043)** to confirm and enforce their perfected legal and equitable interests, publicly recorded via Grant Deeds and UCC Financing Statements. This filing lawfully invoked the Court's

equitable jurisdiction and rendered any subsequent claims by Defendants procedurally subordinate and jurisdictionally void.

20. On or about **May 7, 2025**, Defendants and their counsel submitted a defective, non-verified “Cross-Complaint,” devoid of standing, lawful claim, or verified facts. **This filing was expressly rejected by the Court** and stands as evidence of a **simulated legal process** and **attempted fraud upon the court**.

21. Defendants’ fraudulent, defective, and invalid Cross-Complaint invoked *conclusory* allegations and relied on simulated legal instruments, including a void Trustee’s Deed executed after Plaintiffs’ perfected interest had been publicly recorded. These acts constituted attempted theft, commercial fraud, and criminal trespass upon trust assets.

22. On **May 12, 2025**, in **Case No. CVME2504043**, Plaintiffs and/or Secured Parties filed a, *VERIFIED RESPONSE, CONDITIONAL ACCEPTANCE, AND MOTION AND DEMAND TO STRIKE CROSS-COMPLAINT, SANCTION COUNSEL FOR FRAUD, AND QUIET TITLE IN FAVOR OF PLAINTIFFS*, as a matter of law, relating to the Complaint for Quiet Title brought by WG PRIVATE IRREVOCABLE TRUST. This verified submission remains unrebutted and constitutes a perfected rebuttal to all adverse claims

23. On **May 14, 2025**, in **Case No. CVME2504043**, Plaintiffs and/or Secured Parties filed a *MOTION FOR JUDGMENT ON THE PLEADINGS* on the Quiet Title Complaint. This motion remains **unrebutted and undisputed** as of the filing date.

24. Also on **May 14, 2025**, in **Case No. CVME2504043**, Plaintiffs and/or Secured Parties submitted a, VERIFIED NOTICE, CONDITIONAL ACCEPTANCE, REBUTTAL, MOTION, and DEMAND TO STRIKE FRAUDULENT “RELATED CASE” DESIGNATION, WITH AFFIRMATION OF NON-RELATED STANDING AND MOTION AND DEMAND FOR SANCTIONS AGAINST PLAINTIFF AND COUNSEL FOR FRAUD UPON THE COURT. This verified and unrebutted

1 filing formally repudiated any fabricated connection to other unrelated
2 litigation and documented Defendants' simulated legal joinder and repeated
3 procedural bad faith.

4 25. On **May 14, 2025**, in **Case No. CVME2504043**, Plaintiffs and/or Secured Parties
5 also filed a **Motion for Sanctions** pursuant to **CCP § 128.7 and Rule 11**, which
6 likewise stands **unrebutted**, confirming the Defendants' continued dishonor,
7 procedural default, and commercial liability.

8 26. On **May 15, 2025**, Plaintiffs and/or Secured Parties presented a, **FINAL**
9 **COMMERCIAL SETTLEMENT OFFER AND STIPULATED QUIET TITLE**
10 **JUDGMENT**, duly served on all relevant parties. Defendants rejected the offer
11 in totality, without good cause or verified rebuttal, thereby defaulting in
12 commercial dishonor. A true and correct copy of the settlement offer is attached
13 hereto as **Exhibit BB** and incorporated herein by reference. There dishonorable
14 denial is attached hereto as **Exhibit CC**.

15 27. Defendants have continued to misuse the estate names "™KEVIN WALKER©"
16 and "™DONNABELLE MORTEL©" in fraudulent filings, now constituting no
17 less than twelve (12) unauthorized commercial infringements in violation of the
18 controlling Trademark and Copyright Protection Agreement. Liquidated
19 damages exceed \$12,000,000.00 as a matter of binding commercial record and
20 agreement.

21 28. All filings, including the fraudulent "Notice of Related Case," were issued
22 solely to create a false nexus between unrelated matters, simulate authority, and
23 delay or derail a perfected and lawful quiet title action. This represents an
24 intentional abuse of judicial resources, fraud upon the court, and malicious
25 interference with equitable title.

26 29. Defendants failed to rebut or lawfully answer any of the conditional
27 acceptances, affidavits of default, or commercial instruments on file, and remain
28 in dishonor under UCC § 3-505. This failure confirms their liability, lack of

standing, and **bad faith**, and triggers enforcement under equity, trust law, and commercial code.

30. Every act taken by Defendants and their counsel – including evasion of service, rejection of settlement, and blanket denials without lawful proof – was calculated to injure, deprive, defame, and embezzle protected trust property. These are not mere civil defects; they constitute commercial war against secured, private estate property and the peaceful administration of law

III. LEGAL BASIS FOR SUMMARY DISPOSITION AND JUDICIAL ESTOPPEL

The Cross-Complaint filed by MARINAJ PROPERTIES LLC is legally defective and procedurally void. It was **submitted without verified opposition to Plaintiffs' controlling conditional acceptances, un rebutted affidavits, and pending motions to strike**, and was only retroactively docketed after Plaintiffs had formally challenged it on the record. Under **California Code of Civil Procedure § 436**, such a filing is **subject to immediate striking** as sham, irrelevant, or procedurally improper. In addition, **judicial estoppel** bars any further enforcement of this defective Cross-Complaint. A court may not allow a party to benefit from contradictory or inconsistent positions, particularly where one position has already been estopped or rebutted in verified filings. The following undisputed facts establish the basis for estoppel:

1. The Cross-Complaint was **initially rejected** by the Court;
2. An **ex parte application** was filed on **May 16, 2025**, but the Court **never calendared nor granted any ex parte hearing**;
3. The **Cross-Complaint was only retroactively docketed on May 19, 2025, after Plaintiffs filed**:
 - **A Verified Response and Motion to Strike (May 12);**
 - **Verified Conditional Acceptances and Motions for Sanctions and Judgment on the Pleadings (May 13–16);**

4. The Court has **not issued any lawful hearing notice, order, or substantive ruling** validating MARINAJ's Cross-Complaint;

5. Plaintiffs' filings remain **unrebutted, unrefuted, and conditionally controlling** on the record.

These circumstances collectively create an **irrefutable presumption of dishonor, abandonment, and estoppel**, and render any reliance upon or progression of MARINAJ's Cross-Complaint an act of **procedural fraud, bad faith, and violation of due process**.

Allowing further litigation on this defective filing would constitute **fraud upon the court**, in violation of:

- **Article I, § 7** of the California Constitution (Due Process);
- The **Fifth and Fourteenth Amendments** to the U.S. Constitution;
- And the Court's own duty to prevent abuse of process and uphold judicial integrity.

Accordingly, Plaintiffs move this Court to **summarily dispose of the Cross-Complaint, strike it from the docket, and** confirm that all procedural authority remains with the verified and unrebutted filings of the Plaintiffs.

IV. CONSEQUENCES OF ULTRA VIRES ACTIONS AND NOTICE OF FEDERAL ESCALATION

Absent a verified, **sworn rebuttal** accompanied by lawful, **point-for-point** evidence addressing each of the conditions stated herein, any further action **shall** constitute an unlawful and dishonorable proceeding conducted in commercial bad faith, and shall result in the following legal consequences::

- **An ultra vires act**, performed without lawful jurisdiction, in direct violation of due process, equity, and administrative procedure;
- **Fraud upon the court**, by allowing knowingly dishonored and procedurally defective parties to simulate process against secured private interests;

- 1 • **Violation of civil rights under color of law**, in direct breach of 42 U.S.C. §
2 1983 and related federal protections;
- 3 • **Constructive criminal conspiracy and administrative obstruction**, with
4 personal and joint liability for all officers, agents, or attorneys complicit
5 therein;
- 6 • **Trespass upon secured trust estates**, which have been lawfully perfected and
7 remain unrebutted on the commercial and public record.

8 Let it be clearly understood: any further **ultra vires** conduct by any officer of this
9 Court, including ex parte adjudication in favor of dishonored parties, **will compel**
10 **immediate federal escalation**.

11 Plaintiffs, as Secured Parties and Real Parties in Interest, **shall initiate a federal**
12 **action without further notice** for, inter alia:

- 13 • **Racketeering (18 U.S.C. § 1962)**
- 14 • **Civil rights deprivation (42 U.S.C. § 1983)**
- 15 • **Fraud, slander of title, mail and wire fraud (18 U.S.C. §§ 1341, 1343)**
- 16 • **Forgery and falsification of public records (18 U.S.C. § 1001)**
- 17 • **Obstruction of justice (18 U.S.C. § 1503)**
- 18 • **Conspiracy to interfere with rights (18 U.S.C. § 241)**
- 19 • **Trademark infringement and commercial injury (15 U.S.C. § 1125)**

20 Each of these federal violations carries a **private right of action** and supports treble
21 **damages under 18 U.S.C. § 1964(c)**, and **all judicial officers, court clerks, and**
22 **attorneys** who act beyond their lawful authority shall be held jointly and
23 **severally liable** under the **Clearfield Doctrine** and relevant controlling law.

- 24 • **“Public officials are not immune from suit when they transcend their lawful**
25 **authority by invading constitutional rights.”** — *AFLCIO v. Woodward*, 406 F.2d 137.
- 26 • **“When enforcing mere statutes, judges... do not act judicially... but only in a**
27 **ministerial and not discretionary capacity.”** — *Thompson v. Smith*, 154 S.E. 579,
28 583.

- “Judges can be sued over their official acts and may be held liable for injunctive and declaratory relief, and attorneys’ fees.” — *Lezama v. Justice Court*, A025829.

V. RELIEF DEMANDED

Plaintiffs hereby respectfully demand that this Court take immediate and decisive judicial action in accordance with the **law, equity**, and the unrebutted record now before it. **The Court is compelled** to act under its **ministerial duty** to prevent **fraud, dishonor, and abuse of process**. Therefore, Plaintiffs demand the following relief:

1. **That the Court STRIKE WITH PREJUDICE** the Cross-Complaint of MARINAJ PROPERTIES LLC as **procedurally void, factually unfounded, judicially estopped, and tainted by fraud, dishonor, and lack of standing**;
2. **That the Court formally confirm and enforce the controlling authority of Plaintiffs’ VERIFIED RESPONSE, CONDITIONAL ACCEPTANCES, MOTIONS FOR SANCTIONS, and MOTIONS TO STRIKE**, which were filed between **May 12-19, 2025**, and **remain unrebutted** on the record;
3. **That no hearings, motions, or proceedings be calendared or considered in connection with MARINAJ’s Cross-Complaint** unless and until a **verified, point-for-point, sworn rebuttal** is entered into the record and adjudicated on its face, pursuant to due process and the California Rules of Court;
4. **That all actions arising from MARINAJ’s improper filings, including the issuance of summons, be stayed, vacated, or dismissed immediately**, as predicated upon procedural **fraud, unclean hands, and administrative abuse**;
5. **That the Court provide immediate written order granting the relief requested herein**, to prevent further injury, prejudice, and ongoing due process violations;
6. **A judicial declaration and final order quieting title** to the subject property exclusively in favor of Plaintiff(s), free and clear of any adverse claim, lien, or encumbrance arising from the purported **Trustee’s Deed Upon Sale** or any other instrument asserted by Defendants, and further:

- **Striking from the public record the fraudulent and void ab initio Trustee's Deed Upon Sale**, which has no lawful force or effect and constitutes a simulated legal instrument, recorded *without* authority, and in violation of commercial and property law;
- 7. Imposition of sanctions** upon Defendants and/or their counsel for initiating and attempting to proceed with **simulated legal process**, procedural **fraud**, and **misrepresentation of public records**, in violation of equity, commercial law, and the integrity of the Court;
- 8. Enforcement of commercial liability** and immediate settlement of claims arising from unauthorized use of copyrighted and trademarked names, as contractually agreed to by default, with all associated penalties, liens, and damages enforceable in law and equity;
- 9. Such other and further relief as this Court deems just, proper, and consistent with equity, commercial law, and the interests of justice.**

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 19th 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
Kevin: Realworldfare, Secured Party, Fiduciary,
Authorized Representative, Executor

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.
13. **Exhibit M:** Form 3811 corresponding to Exhibit I.
14. **Exhibit N:** Form 3811 corresponding to Exhibit J.
15. **Exhibit O:** Trust Certificate of WG PRIVATE IRREVOCABLE TRUST.
16. **Exhibit P:** Affidavit: Power of Attorney-In-Fact
17. **Exhibit Q:** Contract and Security Agreement / Affidavit Certificate of Dishonor, Non-response, DEFAULT, JUDGEMENT, and LIEN AUTHORIZATION and LIEN AUTHORIZATION, #RF661592201US.
18. **Exhibit R:** ™KEVIN WALKER© Trademark and Copyright Agreement
19. **Exhibit S:** ™DONNABELLE MORTEL© Trademark and Copyright Agreement
20. **Exhibit T:** Copy of Rule 8.4 Misconduct Approved by the Supreme Court.

- 1 21. **Exhibit U:** Copy of Defendants **defective and fraudulent** CROSS-COMPLAINT
- 2 22. **Exhibit V:** Copy of VERIFIED RESPONSE, *CONDITIONAL* ACCEPTANCE,
- 3 AND MOTION AND DEMAND TO STRIKE CROSS-COMPLAINT, SANCTION
- 4 COUNSEL FOR FRAUD, AND QUIET TITLE IN FAVOR OF PLAINTIFFS, as a
- 5 matter of law (Express Mail #ER192833495US).
- 6 23. **Exhibit W:** Copy of NOTICE OF RETURN of Defendants defective CROSS-
- 7 COMPLAINT.
- 8 24. **Exhibit X:** Proof of delivery of 'VERIFIED RESPONSE..' (Exhibit V) to Court.
- 9 25. **Exhibit Y:** Email correspondence from John Bailey and Barry Lee O'Connor
- 10 showing their clear **evasion, bad faith, and dishonor.**
- 11 26. **Exhibit Z:** Copy of GEORGIA'S OWN CREDIT UNION'S Request to Dismiss
- 12 27. **Exhibit AA:** [PURPORTED] 'DEFENDANTS' VERIFIED RESPONSE AND
- 13 DEMAND FOR DISMISSAL OF FRAUDULENT UNLAWFUL DETAINER AND
- 14 SANCTIONS AGAINST PLAINTIFF AND DEMAND FOR CONSIDERED AND
- 15 STIPULATED JUDGEMENT, AND DEMAND FOR QUIET TITLE AND
- 16 DEMAND FOR SUMMARY JUDGMENT IN FAVOR OF DEFENDANTS, AS A
- 17 MATTER OF LAW
- 18 28. **Exhibit BB:** Final Commercial Settlement Offer and Stipulated Quiet Title
- 19 Judgment.
- 20 29. **Exhibit CC:** Defendants dishonorable denial of settlement Offer.
- 21 30. **Exhibit DD:** Declaration of Notice of Ex Parte Application given to Plaintiffs —
- 22 as served by Defendants' counsel Therese Bailey via email on May 16, 2025,
- 23 purporting notice of hearing on May 20, 2025.
- 24 31. **Exhibit EE:** Defendants' Ex Parte Application to Direct Clerk to File Cross-
- 25 Complaint and Issue Summons — evidencing improper post-default procedural
- 26 maneuvering and attempted backdoor litigation in derogation of perfected and
- 27 un rebutted commercial record.
- 28 32. **Exhibit FF:** Email Correspondence from Defendants' Counsel Re: Ex Parte

Hearing Notice — Email dated May 16, 2025, from Therese Bailey, purporting service of Ex Parte Application without proper standing, good cause, or lawful rebuttal to the perfected commercial record, evidencing continued bad faith, simulated process, and procedural abuse.

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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 19, 2025**, I served the within documents:

1. **VERIFIED MOTION AND DEMAND FOR SUMMARY DISPOSITION, JUDICIAL ESTOPPEL, STRIKING OF DEFECTIVE CROSS-COMPLAINT, AND ENTRY OF DEFAULT AND SANCTIONS FOR DEFENDANTS' DISHONOR, FRAUD, UNCLEAN HANDS, AND BAD FAITH, 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 #ER192833955US

Naji Doumit, Mary Doumit, Daniel Doumit
C/o NAJI DOUMIT, MARINAJ PROPERTIES, FOCUS ESTATES INC
1130 South Tamarisk Drive

Anaheim, California [92807]
Registered Mail #RF775825535US

John L. Bailey (#103867), Therese Bailey (#171043)
C/o THE BAILEY LEGAL GROUP
25014 Las Brisas South, Suite B
Murrieta, California [92562]
Registered Mail #RF775825544US

Barry-Lee: O'Connor
C/o BARRY LEE O'CONNOR, BARRY LEE O'CONNOR & ASSOCIATES
3691 Adams Street
Riverside, California [92504]
Registered Mail #RF775825558US

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.

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C/o BARRY LEE O'CONNOR, BARRY LEE O'CONNOR & ASSOCIATES
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I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **May 19, 2025** in Riverside County, California.

/s/Corey Walker/
Corey Walker

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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.

County of Riverside)

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.

On this 19th 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)

