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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: EEE

1 NICHOLAS PHIPPS WHITE  
2 ceo@thehollywoodlanddevelopmentcompany.com  
3 324 South Beverly Drive, Suite 489  
4 Beverly Hills, California 90212  
5 Phone: (415) 539-6760  
6 Facsimile: (310) 203-0302  
7 Pro Per for Plaintiff

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 NICHOLAS PHIPPS WHITE, a citizen of  
11 California;

12 Plaintiff.

13 vs.

14  
15 ANYWHERE REAL ESTATE, INC.,  
16 BANK OF AMERICA CORPORATION,  
17 AND FIDELITY NATIONAL  
18 FINANCIAL, INC.

19 Defendants.

CASE NO.: 2:22-CV-04557-  
GW (MAAx)

**(VERIFIED) FIRST  
AMENDED COMPLAINT**

Complaint Filed: July 2, 2022  
Judge: Hon. George H. Wu  
Ctrm: 9D, 9<sup>th</sup> Floor

BY FAX

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21  
22 **A. THE PARTIES**

23 1. The Plaintiff, NICHOLAS PHIPPS WHITE, (referred to as "Plaintiff  
24 WHITE") is a U.S. citizen born in Yale-New Haven Hospital in Yale, New Haven, CT  
25 born on February 14, 1969. Since August 2017, Plaintiff WHITE is a California citizen  
26 permanently residing in California with his wife, 52-year old Mirga Phipps White  
27 MBA, Plaintiff WHITE's attorney-in-fact, married since July 21, 2010.  
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1           2.     Plaintiff WHITE is the Chairman and CEO of California based The  
2 Hollywood Land Development Company, LLC. Plaintiff WHITE is the 100 percent  
3 owner of The Hollywood Land Development Company, LLC incorporated and place of  
4 business in California (California Secretary of State No. 201521610145) in California.

5           3.     Plaintiff WHITE is the 100% owner of the Sovereign Towers project  
6 consisting of Sovereign Towers I and II. Sovereign Tower I was to feature an 800-room  
7 Marriott dual-branded Ritz-Carlton, St. Regis luxury hotel sold to the Kingdom of  
8 Saudi Arabia Public Investment Fund. Plaintiff WHITE's father, Laurence Phipps  
9 White, Yale-educated AIA architect, serves as The Sovereign Towers Managing  
10 Director and has been a decades long customer of Merrill Lynch.

11           4.     Plaintiff WHITE is a Bank of America Corporation customer, who opened  
12 his personal and business accounts for himself and The Hollywood Land Development  
13 Company, LLC (California Secretary of State) on January 22, 2019 at the Bank of  
14 America location on 9454 Wilshire Blvd, Beverly Hills, CA 90212 with a U.S. passport  
15 and California driver's license, attached in Exhibit "1." Plaintiff WHITE'S wife Mirga  
16 Phipps White served as a signer on the account.

17           5.     Plaintiff WHITE is the great-great grandson of U.S. Senator Lawrence C.  
18 Phipps of Denver, Colorado, former Treasurer of Carnegie Steel and also the architect  
19 of the creation of the U.S. Steel. Additionally, The Merrill Lynch headquarters was  
20 housed in the U.S. Steel Building.

21           6.     Plaintiff WHITE'S father, Lawrence Phipps White a Merrill Lynch  
22 customer, attended Yale University with Bank of America Global Chairman U.S.  
23 Senator John Kerry, who was born in Denver, Colorado and remained acquaintances in  
24 Washington D.C., until former Senator Kerry's departure in fall of 2019 upon the  
25 discovery of Plaintiff WHITE'S global Merrill Lynch tax-free business account. This  
26 global tax-free business account prevents the IRS from having any jurisdiction and it  
27 was illicitly opened on June 7, 2019 with forged Merrill Lynch Trust documents that  
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were illicitly executed at Girardi Law Offices with forged signatures by Girardi and a fabricated “Erika White” posing as the wife of Chairman and CEO Nicholas Phipps White of The Hollywood Land Development Company, LLC.

7. Defendants in this case, BANK OF AMERICA CORPORATION; ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL, INC. (referred to as “Defendants BANK OF AMERICA CORPORATION; ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL, INC.”) following:

<b>DEFENDANT</b>	<b>DEFENDANT OWNED BY</b>	<b>DEFENDANT PERSONNEL</b>
BANK OF AMERICA CORPORATION NYSE: BAC Previously Bank of Italy HQ: Charlotte, North Carolina 2022 Revenues: \$94.95B Employees:217,000 Brands: Bank of America NA, Merrill Lynch, Private Bank	Berkshire Hathaway NYSE: BRK A HQ: Omaha, Nebraska Owner: Warren Buffett 2022 Revenues: \$302B Employees:36,000 Incorporated: DE Brands: Kraft-Heinz	Chairman/CEO Brian T. Moynihan Esq.; former Bank of America Global Chairman John F. Kerry, Merrill Lynch CEO Andrew Sieg Private Bank President Katy Knox
ANYWHERE REAL ESTATE, INC. NYSE: HOUS (Formerly REALOGY HOLDINGS) HQ: Madison, New Jersey 2021 Revenues: \$7.21B Employees: 9,665, Brands: Coldwell Banker, West Coast Escrow, Sotheby’s International, Century 21	Apollo Global Management NYSE: APO HQ: New York, NY Former CEO Leon Black, CEO Mark Rowan 2022 Revenues: 10.9B Employees: 2,540	CEO: Ryan M. Schneider, former Vice President Tim Foley, Former Coldwell Banker CEO Ryan Gorman, West Coast Escrow President Patrick Frasier
FIDELITY NATIONAL FINANCIAL NYSE: FNF HQ: Jacksonville, FL 2022 Revenues: \$11.55B Employees: 21,759 Brands: Fidelity National Title	The Vanguard Group, Inc. (private) HQ: Malvern, PA 2020 Revenue: \$6.93B Employees:18,800	CEO: Raymond R. Quirk, President Michael J. Nolan Justin Scott Albert Wasiff

Table 1: The Defendants



**B. JURISDICTION AND VENUE**

8. The parties, Plaintiff WHITE and Defendants BANK OF AMERICA CORPORATION, ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL, INC. are all citizens of different states and have an amount in controversy greater than \$75,000. Plaintiff WHITE was born on February 14, 1969 in New Haven, CT. Plaintiff WHITE and his wife Mirga Phipps White MBA, are both permanent citizens of the State of California since 2017. The Court has subject matter jurisdiction over this matter because Plaintiff has verified complete diversity of citizenship, a corporation is considered to be a citizen of both its state of incorporation and its principal place of business:

Plaintiff WHITE, CITIZEN OF CALIFORNIA		
DEFENDANTS	CITIZENSHIP	AMOUNT IN CONTROVERSY
BANK OF AMERICA CORPORATION	NORTH CAROLINA DELAWARE*	\$27,459,774,612
ANYWHERE REAL ESTATE, INC.	NEW JERSEY DELAWARE*	\$118,343,3434 (Spelling Manor) \$55,000,000 (71 Beverly Park)
FIDELITY NATIONAL, INC.	FLORIDA DELAWARE*	\$55,000,000 (Chateau Dubrow)

Table 2: Diversity of Citizenship (\*State of Incorporation)

9. In fact, a federal court can have subject matter jurisdiction on the basis of diversity jurisdiction under 28 U.S.C. § 1332 when a plaintiff alleges claims that: (1) are between citizens of different states, and (2) have an amount in controversy greater than \$75,000. See 28 U.S.C. § 1332(a).

10. Moreover, for diversity purposes, a person is a “citizen” of the state in which he is domiciled of which Plaintiff WHITE is in California. See Kantor v. Wellesley Galleries Ltd., 704 F.2d 1088, 1090 (9th Cir. 1983). A person is domiciled in a location “where he or she has established a ‘fixed habitation or abode in a



1 particular place, and [intends] to remain there permanently or indefinitely.’ “Lew v.  
2 Moss, 797 F.2d 747, 749-50” (9th Cir. 1986), (quoting Owens v. Huntling, “115 F.2d  
3 160, 162” (9th Cir. 1940).

4 **C. GENERAL ALLEGATIONS**

5 11. Beginning at least as early as in or around April 2018 and continuing  
6 through at least in or around February 17, 2023, defendants BANK OF AMERICA  
7 CORPORATION, ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL  
8 FINANCIAL, INC., together with others known and unknown, knowingly and with  
9 intent to defraud, participated in, devised, and executed a scheme to defraud Plaintiff to  
10 whom Defendant BANK OF AMERICA CORPORATION had agreed to provide  
11 banking services, of which BANK OF AMERICA CORPORATION had a duty to  
12 disclose the fraud to Plaintiff WHITE.

13 12. The fraudulent scheme against Plaintiff WHITE, was code named “Project  
14 Phoenix” by the Defendants BANK OF AMERICA, ANYWHERE REAL ESTATE,  
15 INC. and FIDELITY NATIONAL FINANCIAL, INC. Whereby, 54-year old Plaintiff  
16 WHITE was said to have diagnosed “prostate cancer” and had died, with his remains  
17 cremated after being on hospice at “The Palace”, a senior retirement home (1151 West  
18 6th St. Los Angeles, CA) a block away from the now defunct Girardi Keese law firm.

19 13. Plaintiff WHITE met with now disbarred and Italian born Thomas V.  
20 “Tom” Girardi, which records show arrived in Los Angeles in 1954. Interviews for  
21 attorneys took place the week of March 26, 2018, to include Gibson, Dunn & Crutcher  
22 LLP Los Angeles, CA 90067 and Girardi Keese law firm located at 1126 Wilshire  
23 Boulevard, Los Angeles, CA 90017. However, Pro Se Plaintiff WHITE, has not seen  
24 Thomas V. Girardi in California for close to five years since May 14, 2018. During the  
25 three meetings in 2018 Girardi exhibited a suspect shaking right arm and could not  
26 confirm the particulars of his alleged birth place of Denver, Colorado. Plaintiff WHITE  
27  
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1 never hired Girardi, Gibson, Dunn and Kutcher, or any other firm, for resolving the  
 2 U.S. Tort Claim and remained Pro Se.

3 14. Defendant BANK OF AMERICA CORPORATION continues to spread  
 4 disinformation that the Plaintiff is not only deceased but that Tom Girardi was an  
 5 attorney and has attorney-client privilege or claim to Plaintiff WHITE’S funds, despite  
 6 letters from Girardi contradicting this, attached Exhibit “10.”

<b>Date of In-person Meetings with Thomas V. Girardi, Girardi Keese</b>	<b>Notes</b>
March 28, 2018, 10AM PT	Introductory meeting with 83-year old Thomas V. Girardi and 72-year old secretary Shirleen Fujimoto. Tom Girardi confirmed that he had strong relationships in Washington, DC in-place with former Saudi Ambassador to the United States, Prince Turki who Virginia Resident Jamal Khashoggi worked for at the Washington, D.C. embassy whose remains have not been found.
April 16, 2018, 10:45 AM PT	Follow-up meeting with Tom Girardi.
May 14, 2018, 3:00 PM PT	Final meeting with Girardi.

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17 Table 3: All Meetings in California with Girardi

18 15. Furthermore, Plaintiff WHITE’S contract funds consisting of currency and  
 19 gold were laundered by Defendants BANK OF AMERICA CORPORATION,  
 20 ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL, INC.  
 21 into the California Wildfire Fund, stock buy backs, real estate, luxury vehicles, in  
 22 addition, to Merrill Lynch VISA debit cards.

23 16. The Defendants’ scheme operated, in the following manner:

<b>DEFENDANTS’ PROJECT PHOENIX SCHEME</b>	
STEP 1: Impersonate Customer and his wife with forged opening account documents (no business or personal relations in Coral Gables, Florida or Detroit, Michigan. Work with an attorney with more than 200 California Bar complaints spanning 40 years	Bank of America approved opening of global tax-free Merrill Lynch account in Coral Gables, with forged Merrill Lynch Trust documents and forged power of attorney signed by a Nicholas



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<p>Tom Girardi, to falsify birth, death and marriage documents, trust documents, forge power-of attorneys and falsely pose as the Victims attorney/attorney-in-fact. Girardi had long term relationships in place with Bank of America’s owner, fellow Pasadena resident Charlie Munger, attorney Bank of America Chairman/CEO Brian T. Moynihan, and Bank of America Global Chairman former U.S. Senator John Kerry.</p>	<p>White and a manufactured Erika White at now defunct Girardi offices in Los Angeles. Fraudulent Trust documents prepared by Girardi’s legal associate estate attorney Richard Walden, formerly Burris, Schoenberg, Walden LLP of Los Angeles, CA. As reported to AG Garland, Girardi associate attorney Don Burris in December 2019 and in January 2021 with the assistance of former FBI agent Babak Broumand continued to intimidate and threaten Plaintiff WHITE and his wife, Mirga if a complaint to the California Bar on the fraudulent trust at Defendant Bank of America was sent. Bank of America \$25B stock buyback with Plaintiff’s funds, see attached Exhibit “2.”</p>
<p>STEP 2: Intentionally Change Customers Identifying KYC (know your Customer) Data with fraudulent ID and Marriage Certificate, and fraudulent Los Angeles address 1200 S. Grand Ave, Apt 550, Los Angeles, CA 90015. Berkshire Hathaway Vice Chairman attorney and fellow Pasadena resident friend of Girardi’s, Charlie Munger advertises Erika White in <i>The Daily Journal</i> attach “Exhibit 3” who resigned on March 28, 2022 after the Girardi Grand Jury was impaneled in March 2022.</p>	<p>Bank of America intentionally accepts: fraudulent Italian passport from Italian consulate in San Francisco of a Nicholas “Britt” White” with an incorrect birth date of September 21, 1987. “Britt” the Celtic origin of “fire.” Fraudulent Marriage Certificate of a Nicholas Britt White and Erika Pope White per Exhibit “3.” Accept fraudulent address for Nicholas White issue Bank of America N.A. credit cards. Change customers citizenship to Italian, birth date and parent’s names to a “David Britt White” and “Linda Chavez Olivier” see attached Exhibit “3.”</p>



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<p><b>STEP THREE: Obtain Fraudulent Death Certificate/Letters of Probate from Girardi substitute Judge associates. Use Plaintiff's funds to pay Dr. Torosyan to sign a Bank of America related property. On or about July 5, 2022, Dr. Torosyan admits taking payment to pay off medical school loans. A complaint was filed by the Plaintiff to the Medical Board of California, attached as Exhibit "3."</b></p>	<p>Bank of America accepts an unrecorded death certificate and Letters of Administration with an Erika Girard who as the Administrator of the account. Then, falsify medical records at Oakland, CA based Kaiser Permanente for a Nicholas White, Kaiser Medical record number: 23244396, last appointment on May 16, 2019 with urology specialist fraudulently indicating cancer.</p>
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Table 4: Defendants' Scheme to Defraud

**Embezzlement of Plaintiff's Funds**

17. In or about May 2020 Plaintiff WHITE, serving as Pro Se, negotiated a settlement of the U.S. Tort Claims# 164222575, 164222576, 164222577 with the U.S. government provided to Defendant BANK OF AMERICA CORPORATION in

addition to Plaintiff WHITE'S and his wife's last will and testament. The U.S. government was represented by former attorney Thomas M. Cheadl. The terms of the settlement provided that Plaintiff would be paid \$27,823,734,612

property belonging to Plaintiff in the excess of \$27,823,734,612 to be embezzled and used by DEFENDANTS BANK OF AMERICA CORPORATION

whereby Defendant BANK OF AMERICA CORPORATION should pay back to Plaintiff WHITE'S estate, to 06/15/2022, a total amount of \$27,823,734,612

Monell Lunch VISA Debt Card from Plaintiff NICHOLAS WHITE AS NICHOLAS WHITE'S

1 Merrill Lynch account #649-13284; (e) luxury vehicle for Defendants associates Tom  
2 and Erika Girardi; (f) transfer of fraudulent “management fees” to Carlyle Group  
3 related Archer Systems/Investments; and, (g) theft of two sets of Plaintiff WHITE’S  
4 Sovereign Towers U.S. Gold Bullion to foreign buyers and Defendant BANK OF  
5 AMERICA CORPORATION.

6 **CURRENCY**

7 20. On February 26, 2021 Defendant BANK OF AMERICA CORPORATION  
8 accepts signed Plaintiff WHITE’s U.S. Treasury Tort Claim Check from Treasury  
9 employee Shirley E. Gathers in the amount of \$27,459,774,612, endorsed by Erika N.  
10 Girardi posing as an Erika White and serving as the Administrator (Probate) into  
11 Nicholas Phipps White’s Merrill Lynch account #649-13284.

12 21. On or about March 1, 2021, Defendant BANK OF AMERICA  
13 CORPORATION wired approximately 10% (\$2,745,977,461) of Plaintiff WHITE’S  
14 U.S. Treasury Tort Claim Check for fraudulent “attorney’s fees and costs” for Tom  
15 Girardi, the U.S. government’s attorney for Tort Claims# 164222575, 164222576,  
16 16422577 to Camden Capital Partners, LLC of Los Angeles, CA, owned by Girardi’s  
17 friend, Jason Sugarman, whose Controller was the missing accountant Heidi Planck. On  
18 January 11, 2023 the SEC had obtained a Final Judgment against Sugarman, who was  
19 charged in the \$43 million Tribal Bond Scheme.  
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21 22. On or around April 2021, Defendant BANK OF AMERICA  
22 CORPORATION embezzles \$14,000,000,000 from Plaintiff WHITE’S account,  
23 disguised as a part of a \$25B Bank of America stock buy-back plan, see Exhibit “2.”

24 23. On or around October 20, 2021, Defendant BANK OF AMERICA  
25 CORPORATION embezzles the remaining \$11,000,000,000 of Plaintiff WHITE’S  
26 U.S. Treasury check disguised part of a \$25B Bank of America stock buy-back plan.  
27 Furthermore, Plaintiff WHITE successfully completes “proof of life” for his Merrill  
28 Lynch account #649-13284 at approximately 1:30 PM on October 20, 2021 with Bank



1 of America VP of Operations Susie De La Cruz. Additionally, Camden Capital  
2 Partners Controller Heidi Planck is reported missing by her family. Subsequently,  
3 Defendant ANYWHERE REAL ESTATE, INC. in New Jersey retains wrongful death  
4 attorney and later changes their name from Realogy in June 2022.

5 24. On or around November 15, 2021, Defendant BANK OF AMERICA  
6 CORPORATION'S legal representative from Berkshire Hathaway, Shelby Rootenberg  
7 Esquire provides Plaintiff WHITE the Defendant BANK OF AMERICA  
8 CORPORATION'S Officers and Directors (O&D) Insurance of Marsh GLT Specialty.  
9 Thereafter, Defendant BANK OF AMERICA CORPORATION'S Chairman and CEO  
10 Attorney Brian T. Moynihan Esquire blocks Plaintiff WHITE'S e-mail messages, after  
11 more than 104 email requests from the Plaintiff for the return of his funds.

12 25. On or around November 18, 2021, Defendant BANK OF AMERICA  
13 CORPORATION'S Merrill Lynch confirms to customer Plaintiff WHITE that his  
14 Merrill Lynch account no. 649-13284, which was originally opened in Coral Gables,  
15 Florida, had been moved without his permission to Merrill Lynch Auburn Hills,  
16 (Detroit) Michigan area. Merrill Lynch also confirmed that Plaintiff's Merrill Lynch  
17 account no. 649-13284 has Tom Girardi's social security XXX-XX-5134 attached to it.

18  
19 **REAL ESTATE**

20 26. On or about the following dates, Defendants BANK OF AMERICA  
21 CORPORATION, ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL  
22 FINANCIAL, INC., aided and abetted each other, for the purpose of executing the  
23 above-described "Project Phoenix" scheme to defraud, transmit, and initiate the  
24 transmission by means of wire communication in interstate commerce to buy main  
25 residence and beach properties for Tom and Erika Girardi. Properties also included: a  
26 \$1,030,000 property in April 14, 2022 for Girardi's secretary Shirleen Fujimoto in  
27 Oahu, Hawaii after the March 2022 Grand Jury convened, family members of cast  
28 members of the Real Housewives franchises, such as a property for a Hilton family



1 member in \$8.4M Malibu, California in June 14, 2021 purchased from deceased  
2 Universal Chairman Tom Pollock Estate, a \$1,070,750 property in Bradford, New  
3 Hampshire in December 13, 2019, a \$4,350,000 property across the Italian Consulate in  
4 San Francisco in November 8, 2019, and a \$460,770 property in Plainfield, Indiana in  
5 March 30, 2022 for the Defendants to continue to hide and conceal Plaintiff WHITE'S  
6 U.S. Gold Bullion from the United States Department of Justice, as part of the May  
7 2020 Tort Claim Settlement with the Plaintiff.

8 27. In fact, Defendants BANK OF AMERICA CORPORATION,  
9 ANYWHERE REAL ESTATE, INC, FIDELITY NATIONAL FINANCIAL ensured  
10 transactions were disguised as purchase by an "anonymous buyer" in most cases, with  
11 at least eight known properties across the United States to include: the Spelling Manor  
12 in California, July 2019, and even after the Federal Grand Jury in 2022 in California,  
13 Defendants continued to aid and abet Tom and Erika Girardi.

14 28. On May 27, 2022, the Defendants received multiple demand letters from  
15 Plaintiff starting in May 2022-July 1, 2022, including the Third Amended Complaint  
16 filed on April 15 2022, in regards to Nicholas Phipps White vs. Bank of America  
17 N.A./Merrill Lynch, were sent to Defendant ANYWHERE REAL ESTATE, INC.  
18 Based on numerous calls to West Coast Escrow President Mr. Patrick Frasier, who was  
19 aware that fraud occurred on the subject title for the "Spelling Manor" 594 South  
20 Mapleton Drive, Los Angeles, CA 90024 see attached Exhibit "2", and that the matter  
21 was being corrected, without any need for litigation in addition to the California  
22 Department of Real Estate being notified regarding the matter via the complaints on the  
23 Anywhere Real Estate owned Coldwell Banker agents, to include Jade Mills regarding  
24 the fraud on July 2, 2019.

25 29. On May 27, 2022, a call was returned to Plaintiff WHITE from Minny Ng,  
26 the Escrow Officer, designated in the Fraudulent Grant Deed recorded on July 2, 2019,  
27 Plaintiff WHITE's wife Mirga's birthday, July 2, 1970. Ms. Ng's initials appear in the  
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1 left side under Escrow No.: 4510219-01826-MN. Ms. Ng was aware that Plaintiff  
2 WHITE was the owner of the property, and in fact as the Escrow Officer for the July 2,  
3 2019 fraudulent transaction, would be amenable if Plaintiff WHITE and former  
4 Virginia Attorney General Jim Gilmore would draft a corrected Grant Deed and File at  
5 the Recorder's Office, Los Angeles, County, California.

6 30. On June 3, 2022, rather Defendant ANYWHERE REAL ESTATE, INC.,  
7 be amenable to return the keys by Alan Roach the fraudulent Property Manager of  
8 Spelling Manor and Clinton Development Inc. officer. Mr. Roach refused to conduct a  
9 transfer of keys and remote from Property Manager, and furthermore as the agent of  
10 record of a fraudulent LLC. Instead, on June 9, 2022, an American publicly traded  
11 Realogy Holdings Corp, completed an abrupt name change to Anywhere Real Estate  
12 Inc. after making an announcement in May 2022.

13 31. On Tuesday, June 21, 2022 Plaintiff WHITE spoke to the President of  
14 West Coast Escrow, Mr. Patrick Frasier, who confirmed he had received the related  
15 emails for the demand that the subject "Grant Deed" for property be corrected and that  
16 Mr. Frasier had designated West Coast Escrow, Regional Manager of Los Angeles and  
17 Ventura County, Mr. Chris LeBreton to work with Ms. Minny Ng the Escrow Officer  
18 for the July 2, 2019 transaction.

19 32. On June 23, 2022, Plaintiff WHITE spoke to Mr. Frasier again, who  
20 confirmed that the Grant Deed was in the works of being corrected, and that the  
21 recording of the Deed could be done within his company because he was on his way to  
22 Anywhere Real Estate Headquarters in New Jersey via Newark, NJ airport.

23 33. On July 1, 2022 Plaintiff WHITE speaks to Defendant ANYWHERE  
24 REAL ESTATE, INC'S Mr. Frasier, who confirms the corrected Grant Deed for the  
25 Spelling Manor has been corrected, prepared, and is ready, but he is awaiting corporate  
26 headquarters release to Plaintiff WHITE.  
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1           34. On July 2, 2022, Plaintiff WHITE filed a Civil Complaint against  
2 Defendant ANYWHERE REAL ESTATE, INC. (Case No.2:22-CV-04557-GW-MAA)  
3 for one count of fraud. Subsequently, on July 14, 2022, the Plaintiff issued a press  
4 release on Law.com citing Berkshire Hathaway’s Charlie Munger of Munger, Tolles  
5 and Olson being currently under investigation with the CA State bar.

6           35. On or about July 6, 2022, Defendant BANK OF AMERICA  
7 CORPORATION located at 100 North Larchmont Boulevard, Los Angeles, CA 90004,  
8 where the fraud occurred starting on or about July 5, 2020 at that Bank of America  
9 branch by Erika Girardi is closed down immediately with a reported opening date of  
10 September 22, 2022. Additionally, the new U.S. Attorney for the Central District of  
11 California Honorable U.S. Attorney Mr. E. Martin Estrada was sworn in on or about  
12 September 19, 2022.

13           36. Plaintiff WHITE On or about September 28, 2022 served the Defendant  
14 ANYWHERE REAL ESTATE, INC. with Central District of California Case No. 2:22-  
15 CV-04557-GW-MAA Nicholas Phipps White vs. Anywhere Real Estate, Inc. after the  
16 departure of Anywhere Real Estate Vice President Tim Foley was announced.

17           37. On October 20, 2022 at around 4:03 PM PT, Defendants BANK OF  
18 AMERICA CORPORATION and FIDELITY NATIONAL FINANCIAL, INC. again  
19 used Plaintiff WHITE’S funds from his Merrill Lynch account to pay for vacation  
20 property “Chateau Dubrow” in Newport Beach and then again with Defendant  
21 ANYWHERE REAL ESTATE, INC. on February 17, 2023 for 71 Beverly Park,  
22 Beverly Hills, CA for a main residence for disgraced attorney Tom Girardi and  
23 associate’s use, disguised as purchased by US No. 8 LLC, A California Limited  
24 Liability Company, see attached Exhibit “5.”

25           38. In a related transaction, on February 19, 2023, Plaintiff WHITE’S Merrill  
26 Lynch funds were again disguised for 71 Beverly Park as purchased by US No. 3 LLC,  
27 A California Limited Liability Company, attached as Exhibit “6” with the Defendants  
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1 ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL,  
 2 INC., similar to the Spelling Manor transaction and others.

3 39. Plaintiff WHITE is the rightful owner of the following properties disguised  
 4 by the Defendants as “anonymous buyer” with the Plaintiff WHITE funds at Defendant  
 5 BANK OF AMERICA CORPORATION per the following:

DATE	REAL ESTATE TRANSACTION	DEFENDANT(S)/WHO BENEFITTED
7/2/19	Spelling Manor*: Wire Transfer of approximately \$119,750,000 from Bank of America Corporation, Plaintiff’s Merrill Lynch account #649-13284, in Los Angeles, California, through the Fedwire system to the Escrow Account, in Los Angeles, California, “Spelling Manor” located at 594 South Mapleton Dr. Los Angeles, CA 90024, A.P.N. 4359-013-032594.	BANK OF AMERICA CORPORATION, ANYWHERE REAL ESTATE, INC., FIDELITY NATIONAL FINANCIAL, INC./Erika Girardi, Tom Girardi and their friends and family. *Disguised as a “birthday” gift from Plaintiff WHITE’S wife, whose actual birthday is July 2, 1970
10/20/22	Chateau Dubrow*: Wire Transfer of approximately \$55,000,000 from Bank of America Corporation, Plaintiff’s Merrill Lynch account #649-13284, through the Fedwire system to the Escrow Account, in Los Angeles, California, “Chateau Dubrow” located at 2 Coral Ridge, Newport Beach, CA 92657, A.P.N. 489-181-06. Fidelity National Title Order No.: 00362034-994(Title Officer: Albert Wassif, Fidelity National Title, 5000 Van Nuys Blvd, Suite 500, Sherman Oaks, CA, 91403) “anonymous buyer” and sellers represented by Josh Altman of Douglas Elliman, Beverly Hills, CA	BANK OF AMERICA CORPORATION, FIDELITY NATIONAL FINANCIAL, INC./Erika Girardi, Tom Girardi and their friends and family. *House purchased at the one year “proof of life” mark of Plaintiff WHITE and missing accountant Heidi Planck from Camden Capital. *signed by owner Bank of America customer Terry Dubrow on September 28, 2022, the day Defendant ANYWHERE REAL ESTATE, INC. was served.

<p>1 2/17/23</p>	<p>2 71 Beverly Park*: Wire Transfer of</p> <p>3 approximately \$55,000,000 from Bank</p> <p>4 of America Corporation, Plaintiff's</p> <p>5 Merrill Lynch account #649-13284, "71</p> <p>6 Beverly Park" located at 71 Beverly Park</p> <p>7 Drive, Beverly Hills, CA 90210, A.P.N.</p> <p>8 4386-013-020. Fidelity National Title</p> <p>9 Order No.: 00368341-994AW (Title</p> <p>10 Officer: Albert Wassif, Fidelity National</p> <p>11 Title, 5000 Van Nuys Blvd, Suite 500,</p> <p>12 Sherman Oaks, CA 91403) and</p> <p>13 Anywhere Real Estate Inc.'s Escrow No:</p> <p>14 4510223-00293-BB, Bryan Binns</p> <p>15 Escrow Officer. Anonymous Buyer</p> <p>16 represented by former Coldwell Banker</p> <p>17 broker Ginger Glass of Compass and</p> <p>18 seller Compass' Carl Gambino.</p>	<p>19 BANK OF AMERICA</p> <p>20 CORPORATION,</p> <p>21 ANYWHERE REAL</p> <p>22 ESTATE, INC., FIDELITY</p> <p>23 NATIONAL FINANCIAL,</p> <p>24 INC./Erika Girardi Tom</p> <p>25 Girardi and their friends and</p> <p>26 family.</p> <p>27 *signed by owner and Bank of</p> <p>28 America customer Mark</p> <p>Wahlburg on February 15,</p> <p>2023 the two-year anniversary</p> <p>of Marriott International</p> <p>CEO's Arne Sorenson passing.</p>
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Table 5: Real Estate Transactions

**CREDIT CARDS**

40. On or about the following dates, within the Central District of California, and elsewhere, Defendant BANK OF AMERICA CORPORATION, ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL, INC., aiding and abetting each other, for the purpose of executing the above-described scheme to defraud Plaintiff WHITE in the following credit card transactions:

41. On or around August 27, 2021, at approximately 11:49 AM PT Bank of America Financial Center Operations Manager, Bank of America "whistleblower" Suzy De La Cruz, at 100 North Larchmont Blvd, Los Angeles, CA 90004 confirmed that Plaintiff WHITE'S Merrill Lynch account no. 649-13284 title as Palm Beach County Sheriff's Office for the Benefit of Nicholas Phipps White contains more than 35 Merrill VISA debit cards. Additionally, Bank of America Corporation was the founder and previous owner of VISA Corporation, headquartered in San Francisco, CA, as was Bank of Italy which merged with Bank of America.



1           42. On around September 1, 2021 Defendant BANK OF AMERICA  
 2 CORPORATION’S designated fraudulent administrator Erika Girardi posing as  
 3 Plaintiff WHITE’S wife and widow is photographed in Los Angeles, CA using one of  
 4 the 35 plus Merrill Lynch cards of the Plaintiff’s related to his Merrill Lynch account  
 5 #649-13284 as shown in Exhibit “7”.

6           43. Closure of Bank of America, N.A VISA credit card opened for “Nicholas  
 7 Britt White.” The Civil Case Coversheet dated June 3, 2022, Superior Court of  
 8 California, County of Los Angeles, Case No. 22NWLC13380, Bank of America N.A.  
 9 vs. Nicholas Britt White for \$3,989.00 as shown in Exhibit “7”.

10           44. Closure of Bank of America, N.A VISA credit cards opened for Nicholas  
 11 Britt White. Civil Case Coversheet dated June 3, 2022, Superior Court of California,  
 12 County of Los Angeles, Case No. 22NWLC13261, Bank of America N.A. vs. Nicholas  
 13 Britt White for \$2,592.15 as shown in Exhibit “7.”

<b>DATE OF DEPOSIT/TRANSFER</b>	<b>DESCRIPTION</b>	<b>DEFENDANT (S) INVOLVED/WHO BENEFITTED</b>
August 27, 2021 - present	On or around August 27, Plaintiff WHITE’S Merrill Lynch account no. 649-13284 title as Palm Beach County Sheriff’s Office for the Benefit of Nicholas Phipps White contains more than 35 VISA debit cards.	BANK OF AMERICA CORPORATION and more than 35 friends and family of Tom and Erika Girardi.
June 2, 2022	Closure of Bank of America, N.A VISA credit card opened for Nicholas Britt White. Civil Case Coversheet dated June 3, 2022, Superior Court of California, County of Los Angeles, Case No. 22NWLC13380, Bank of America N.A. vs. Nicholas Britt White for \$3,989.00	BANK OF AMERICA CORPORATION  Tom Girardi’s stepson and Erika Girardi’s son, Tom Zizzo



1 June 2, 2022 2 3 4 5 6 7	Closure of Bank of America, N.A VISA credit cards opened for Nicholas Britt White. Civil Case Coversheet dated June 3, 2022, Superior Court of California, County of Los Angeles, Case No. 22NWLC13261, Bank of America N.A. vs. Nicholas Britt White for \$2,592.15	BANK OF AMERICA CORPORATION  Tom Girardi's stepson and Erika Girardi's son, Tom Zizzo
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Table 5: Credit Cards

**LUXURY VEHICLES**

45. On or about July 1, 2019 wire Transfer of approximately \$4,000 from Bank of America Corporation Plaintiff's Merrill Lynch account #649-13284, in Los Angeles, California, to Russell Westbrook Alfa Romeo Maserati of Van Nuys, California for a 2019 Alfa Romeo Giulia motor vehicle, Vehicle Identification No. ZARFAMAN4K7606474 sold, leased to an "Erika White" by Sales Manager, Armenian-born Vahag Zhamkochyan. Superior Court of State of California, County of Los Angeles (Van Nuys District) Case No. 22VECV01173, attached as Exhibit "8."

<b>Date</b>	<b>Transaction with Plaintiff's Funds</b>	<b>DEFENDANT (S) INVOLVED/WHO BENEFITTED</b>
18 On or about June 7, 19 2019*Defendant Bank of 20 America Corporation 21 ceased making payments 22 once Plaintiff White 23 filed Miami-Dade 24 County Case No. 2021- 25 013813-CA-01 against 26 Bank of America 27 N.A./Merrill Lynch on 28 June 7, 2021	2019 Alfa Romeo*: Wire Transfer of approximately \$4,000 from Bank of America Corporation Plaintiff's Merrill Lynch account #649-13284, in Los Angeles, California, to Russell Westbrook Alfa Romeo Maserati of Van Nuys, California for a 2019 Alfa Romeo Giulia motor vehicle.	BANK OF AMERICA CORPORATION/Erika Girardi posing as Plaintiff WHITE'S wife. *Disguised as a "birthday" gift from Plaintiff WHITE'S wife, whose actual birthday is July 2, 1970.

Table 6: Luxury Vehicles

**GOLD BULLION/BARS:**

46. On or about the following dates, Defendant BANK OF AMERICA CORPORATION, ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL FINANCIAL, INC., aiding and abetting each other, for the purpose of executing the above-described scheme code-named “Project Phoenix” to defraud Plaintiff WHITE of his U.S. Gold Bullion, which was part of his contract funds from the sale of the Marriott-branded “Sovereign Towers” project. The Defendants did not return the Plaintiff WHITE’S gold to the U.S. government per the Stipulation For Compromise Settlement and Release Agreement with the U.S. government:

<b>Date</b>	<b>Transaction with Plaintiff’s Funds</b>	<b>DEFENDANT (S) INVOLVED/WHO BENEFITTED</b>
On or about October 2019	1,848 U.S. Gold Sovereign Towers II Bullion Bars kept concealed from Plaintiff WHITE by Defendant BANK OF AMERICA CORPORATION and their owners BERKSHIRE HATHAWAY owners of Kraft- Heinz Food, 1301 Heinz Drive, Fremont, Ohio 43420 transported on October 31, 2020, see Exhibit “7.” Plaintiff WHITE’S Sovereign Tower II U.S. Gold Bullion recovered On February 8, 2023 reported to U.S. AG Garland and U.S. Attorney John Lausch being located in 5426 Lavender Drive, Plainfield, Indiana 46168	BANK OF AMERICA CORPORATION, ANYWHERE REAL ESTATE. INC.
On or about June 2019	1,848 U.S. Gold “Sovereign Towers I” Bullion Bars kept concealed from Plaintiff WHITE by Defendant BANK OF AMERICA CORPORATION sold to Russian Lukoil oligarch after visit to U.S. in	BANK OF AMERICA CORPORATION Tom and Erika Girardi and their associates.



	March 2019. Bank of America aided and abetted by Bank of America Landver family of Los Angeles, see Exhibit “7.” Plaintiff WHITE’S U.S. Gold Bullion recovered by the U.S. Department of Justice on or about August 8, 2022. On or about August 8, 2022 Carlyle Group CEO Kewson Lee steps down.	
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Table 7: U.S. Gold Bullion/Gold Bars

**MISCELLANEOUS FEES:**

**Attorneys’ Fees and Costs**

47. As part of the Defendants’ plan to defraud Plaintiff WHITE code-named “Project Phoenix” Defendant, BANK OF AMERICA CORPORATION, after illicitly depositing Plaintiff WHITE’S U.S. Treasury check in the amount of \$27,459,774,612 endorsed by Erika Girardi posing as the Plaintiff widow on or about February 26, 2021.

48. Defendant BANK OF AMERICA CORPORATION thereafter on or about March 1, 2021 under the false pretense of “attorneys’ fees and costs for Tom Girardi” who never served as Plaintiff WHITE’S attorney. wired approximately 10% percent (\$2,745,977,461) of Plaintiff WHITE’S U.S. Treasury check to Tom Girardi associate Camden Capital Partners, LLC. Camden Capital Partners is located at 1880 Century Park East, Suite 950, Los Angeles, CA 90067.

49. Defendant BANK OF AMERICA CORPORATION continues to spread disinformation that the Plaintiff is not only deceased but that Tom Girardi was an attorney and has attorney-client privilege or claim to Plaintiff WHITE’S funds, despite letters from Girardi contradicting this, shown in Exhibit “10.”

**“Management Fees”**

50. Defendant BANK OF AMERICA CORPORATION at 555 California Street, also known as the Bank Tower, a 52-story skyscraper in San Francisco’s Financial District intentionally without the Plaintiff WHITE knowledge, with falsified Merrill Lynch Trust Documents and power of attorney from on or about May 17,2019, forged by Tom Girardi and his secretary Shirleen Fujimoto, allowed Washington, D.C. Carlyle Group’s Founder William E. Conway, Jr. related Devon Investments/Archer Systems disguised as “web presence” media firm across 16 states as shown in Exhibit “10” to illicitly annually extract a 2% “management fee” from Plaintiff WHITE’S Merrill Lynch account #649-13284.

51. On or about the following dates, Defendant BANK OF AMERICA CORPORATION, for the purpose of executing the above-described scheme to defraud, transmitted and caused to be transmitted by means of wire communication in interstate commerce some of the following fees:

<b>Date</b>	<b>Transaction with Plaintiff’s Funds</b>	<b>DEFENDANT (S) INVOLVED/WHO BENEFITED</b>
On or about March 1, 2021	Defendant BANK OF AMERICA CORPORATION wires approximately 10% (\$2,745,977,461) of Plaintiff WHITE’S U.S. Treasury Tort Claim Check for fraudulent “attorneys fees” for Tom Girardi, the U.S. government’s attorney for Tort Claims# 164222575, 164222576, 16422577 to Camden Capital Partners of Los Angeles, CA whose Controller is Heidi Planck.	BANK OF AMERICA CORPORATION/Erika and Tom Girardi and their friends and family.
June 7, 2019 – May 2020	2% percent management fees from Plaintiff WHITE’S Merrill Lynch account.	BANK OF AMERICA CORPORATION/Carlyle Group Related Archer Systems/Devon Investments.

Table 8: Attorneys’/Management Fees



1           52. The Honorable Judge Wu subsequently granted four continuances starting  
2 in October 2022 through February 2023 for the parties to resolve this grave and serious  
3 matter in Miami-Dade County, Florida, per the Bank of America/Merrill Lynch Case  
4 No. 2021-013813-CA-01 with the Honorable Judge Orshan who had replaced former  
5 Judge Mark Blumstein. Judge Blumstein was recently reprimanded by The Florida  
6 Supreme Court for unethical behavior and was not re-elected by his peers. Plaintiff  
7 WHITE submitted under seal a Stipulation Agreement to Defendant BANK OF  
8 AMERICA CORPORATION within the insurance limits of their Marsh Inc. policy  
9 limit of \$25B and Lloyd's of London \$1B for the more than 35+ Merrill Lynch debit  
10 cards. The Stipulation Agreement included the latest amount owed of \$550,881,512.21  
11 to the more than 687 Victims of Girardi Bankruptcy with pick-up with Plaintiff WHITE  
12 and former Virginia Governor/Attorney General Jim Gilmore. Defendant BANK OF  
13 AMERICA CORPORATION'S Counsel of Liebler, Gonzalez and Portuondo P.A. as of  
14 February 21, 2023 did not sign and resolve the matter for their client despite the  
15 conditions met to include an Abstract of Judgment issued for the fraudulent Bank of  
16 America N.A. cards, shown in Exhibit "7." Additionally, one Bank of America  
17 Counsels' attorneys on the case was removed due to her conflict with Apollo Global  
18 Management founder Josh Harris. Moreover, Defendant BANK OF AMERICA  
19 CORPORATION'S Counsel did not substitute their attorney of record, who was on  
20 medical leave.

21  
22           53. On or about February 1, 2023 disbarred attorney Thomas V. Girardi with  
23 social security number XXX-XX-5134 is federally indicted CR No. 2:23-cr-00047-  
24 JFW in the U.S. District Court for the Central District of California for five counts of  
25 wire fraud after a March 2022 Grand Jury. On March 22, 2022, Plaintiff WHITE had  
26 reported to the Honorable U.S. Attorney General Merrick Garland that his U.S.  
27 Treasury check from February 26, 2022 misappropriated at the Defendant BANK OF  
28 AMERICA CORPORATION, shown in Exhibit "11." Court records show that Italian

1 citizen Thomas V. Girardi was allegedly unable to locate his passport or other travel  
2 documents which had been requested by the Court to be surrendered.

3 54. As a direct and proximate result of the Defendants BANK OF AMERICA  
4 CORPORATION, ANYWHERE REAL ESTATE, INC. and FIDELITY NATIONAL  
5 FINANCIAL, INC. misconduct and negligence to conform to a certain standard of  
6 conduct that resulted in injury and loss to Plaintiff WHITE.

7  
8 **PRAYER FOR RELIEF**

9  
10 WHEREFORE, Plaintiff WHITE, as individual, being the real party of interest,  
11 prays for the following relief.

12 (a) Judgment for damages from Defendant BANK OF AMERICA  
13 CORPORATION, in the amount of \$27,459,343,612. Closure of the Merrill  
14 Lynch account #649-13284 titled Palm Beach County Sheriff's Office for  
15 Nicholas Phipps White and closure of all related Nicholas Phipps White related  
16 and Nicholas Britt White accounts at Bank of America Corporation.

17  
18 (b) Judgment for punitive damages from Defendant ANYWHERE REAL  
19 ESTATE, INC., in the amount of \$1,572,750,000. Judgment ordering Anywhere  
20 Real Estate, Inc. to correct the grant deed from July 19, 2019 \$119,750,000 APN:  
21 4359-013-032 (590 South Mapleton Drive, Los Angeles, CA 90024) from the  
22 street address "594 South Mapleton LLC" to "Nicholas Phipps White, individual,  
23 married, recorded in the County of Los Angeles, CA within five (5) business  
24 days. Additional Judgment ordering Anywhere Real Estate, Inc. to correct the  
25 grant deed from February 17, 2023 \$55,000,000 APN: 4386-013-020 (71 Beverly  
26 Park, Beverly Hills, CA 90210 from U.S. No. 3 LLC to "Nicholas Phipps White"  
27 individual, married, recorded in the County of Los Angeles, CA within five (5)  
28 business days.



1 (c) Judgment for punitive damages from Defendant FIDELITY  
2 NATIONAL FINANCIAL, INC. in the amount of \$495,000,000. Judgment  
3 ordering Fidelity National Financial, Inc. to correct the grant deed from October  
4 20, 2022, \$55,000,000 APN: 489-181-06 (2 Coral Ridge, Newport Beach, CA)  
5 from "U.S. No. 8 LLC" to "Nicholas Phipps White" individual, married, recorded  
6 in the County of Orange, CA within five (5) business days.

7  
8 (d) Interest income.

9  
10 (e) An award of interest; and such other and further relief that the Court deems  
11 reasonable and just.  
12

13 DATED: March 23, 2023

**DEMAND FOR JURY TRIAL**

14  
15 Respectfully submitted,  
16 /s/ Nicholas Phipps White  
17 NICHOLAS PHIPPS WHITE, PRO SE  
18 324 South Beverly Drive, Suite 489  
19 Beverly Hills, CA 90212  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT 1**



WIKIPEDIA

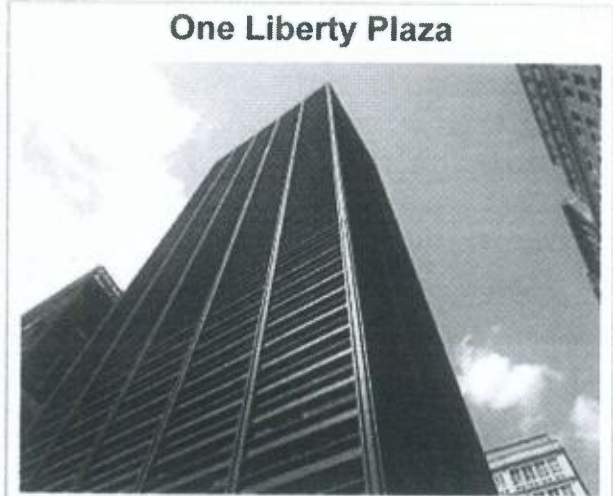
Coordinates: 40°42′35″N 74°00′39″W﻿ / ﻿40.71000°N 74.01083°W﻿ / 40.71000; -74.01083

# One Liberty Plaza

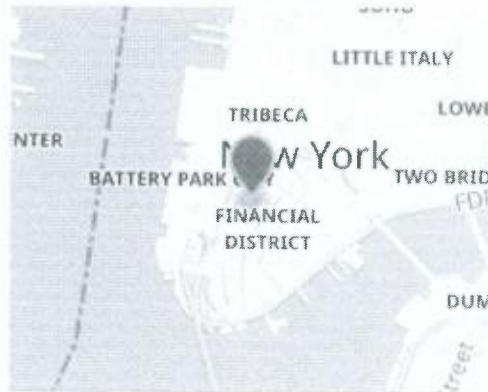
**One Liberty Plaza**, formerly the **U.S. Steel Building**, is a skyscraper in the Financial District of Lower Manhattan in New York City. It is situated on a block bounded by Broadway, Liberty Street, Church Street, and Cortlandt Street, on the sites of the former Singer Building and City Investing Building.

The building was designed in the International Style by Skidmore, Owings & Merrill and completed in 1973. It is 743 ft (226 m) tall and has 54 floors. At 2.3 million sq ft (210,000 m<sup>2</sup>), each floor offers almost 1 acre (0.40 ha) of office space, making it one of the largest office buildings in New York by usable interior space. Its facade is black, consisting of a structural steel frame. South of the building is Zuccotti Park, formerly called Liberty Plaza Park.

One Liberty Plaza was originally commissioned by U.S. Steel, and also housed the headquarters of Merrill Lynch. A variety of tenants occupy the space, from large law firms to public and not-for-profit agencies like the Lower Manhattan Development Corporation and the World Trade Center Memorial Foundation as well as new businesses. Since 2001 One Liberty Plaza has been owned and operated by Brookfield Office Properties.



One Liberty Plaza in 2011



## General information

<b>Status</b>	Completed
<b>Type</b>	Commercial; office
<b>Architectural style</b>	International Style
<b>Location</b>	165 Broadway New York City, New York United States 10006
<b>Coordinates</b>	<span><span><span><span><span>40°42′35″N</span> <span>74°00′39″W</span></span></span><span><span>﻿</span> / <span>﻿</span></span><span><span>40.71000°N 74.01083°W</span><span><span>﻿</span> / <span>40.71000; -74.01083</span></span></span></span></span>
<b>Construction started</b>	1969
<b>Completed</b>	1972

Wikimedia | © OpenStreetMap

## Contents

- [History](#)
- [Tenants](#)
- [See also](#)



**Mr. Lawrence Phipps White AIA, The Sovereign Towers Managing Director and  
Mr. Nicholas Phipps White, Chairman and CEO The Hollywood Land  
Development Company, LLC**



"I can think of no better tribute to the amazing legacy of Arne Sorenson than to focus on educating and advancing future leaders of the hospitality industry," said J.W. "Bill" Marriott, Jr., Executive Chairman and Chairman of the Board, Marriott International. "Arne's passion for creating a culture of opportunity brought real change in the executive ranks of our company. But work remains to be done. Our industry needs a pipeline of diverse leadership talent and that's exactly what this Center will achieve. We are proud to bring Marriott International and our family foundation together to partner with this esteemed university in the city of our founding. This innovative program will foster leadership excellence and help drive greater inclusion at the most senior levels of the hospitality industry. We hope that other hospitality companies will join us in designing the program and providing experiential opportunities to generate talent that will meet the needs of the industry well into the future."



**Marriott Chairman Mr. Bill Marriott with  
Marriott CEO Mr. Arne Sorenson**

"Now is the opportune time to launch this work," said Mieka Wick, Executive Director, The J. Willard and Alice S. Marriott Foundation. "The hospitality industry is evolving in new and exciting ways and there is a clear need for a forward-looking program designed to prepare leaders for this dynamic environment. A deeper commitment to diversity, equity and inclusion is imperative, not only because it is the right thing to do but because it is also good for the industry. The J. Willard and Alice S. Marriott Foundation has a long-standing commitment to creating opportunity for all

**Bank of America**  
BANK OF AMERICA, N.A. (THE "BANK")

**Account Summary  
Information**

Thank you for allowing us to assist you with your banking needs. Here is a summary of the accounts and services we set up for you or which you applied for today. If any of this information is incorrect, please let us know. We appreciate the opportunity to serve you.

THE HOLLYWOOD LAND DEVELOPMENT COMPANY LLC

CHECKING ACCOUNT

Account Number	3251 1566 4401
ACH Routing Number	121000358
Title on Account	THE HOLLYWOOD LAND DEVELOPMENT COMPANY LLC
Address	324 S BEVERLY DR APT 398  BEVERLY HILLS, CA 90212

Business Advantage Chk

Address

324 S BEVERLY DR APT 398

BEVERLY HILLS, CA 90212

BUSINESS DEBIT CARD

Business	THE HOLLYWOOD LAND
Name on Card	NICHOLAS WHITE
Account Number	4815880024805477
Address	324 S BEVERLY DR APT 398

BEVERLY HILLS, CA 90212

Account(s) Linked for Access:

Business Advantage Chk, 32511 5664401

**Bank Information**

Date	2019-01-22
Banking Center Name	BEVERLY WILSHIRE
Associate's Name	Atef Hassine
Associate's Phone Number	424-203-4684





**EXHIBIT 2**



Newsroom

Share    

## Bank of America Sets Q4-21 Stock Dividend, Renews \$25 Billion Repurchase Plan

October 20, 2021 at 11:50 AM Eastern

Bank of America today announced the Board of Directors declared a regular quarterly cash dividend on Bank of America common stock of \$0.21 per share, payable on December 31, 2021 to shareholders of record as of December 3, 2021. The Board also renewed the company's previously announced \$25 billion common stock repurchase program.

In April, Bank of America announced plans to repurchase up to \$25 billion in common stock over time. Through the end of the third quarter of 2021, approximately \$14 billion in stock had been repurchased under that program. Today's authorization replaces the previous program and will provide additional flexibility going forward, in line with the company's commitment to return to shareholders excess capital that is not needed to support economic growth, deliver for customers and communities, invest in the future and sustain strength and stability through the cycle. As with the April authorization, the Board also authorized repurchases to offset shares awarded under the company's equity-based compensation plans.

Bank of America's ability to make capital distributions depends, in part, on its ability to maintain regulatory capital levels above the 9.5% CET1, (Common Equity Tier 1) requirement: the sum of the Federal Reserve Board's regulatory minimum of 4.5% and applicable regulatory buffers; including the Stress Capital Buffer (SCB) of 2.5%; and the Global Systemically Important Bank Holding Company surcharge of 2.5%. As of September 30, 2021, Bank of America's CET1 ratio was 11.1%.

The timing and amount of common stock repurchases made pursuant to the Bank of America common stock repurchase program are subject to various factors, including the company's capital position, liquidity, financial performance and alternative uses of capital, stock trading price, regulatory requirements and general market conditions. Also, it may be suspended at any time. The common stock repurchases may be effected through open market purchases or privately negotiated transactions, including repurchase plans that satisfy the conditions of Rule 10b5-1 of the Securities Exchange Act of 1934, as amended.

The Board also declared a regular quarterly cash dividend of \$1.75 per share on the 7% Cumulative Redeemable Preferred Stock, Series B. The dividend is payable on January 25, 2022 to shareholders of record as of January 14, 2022.

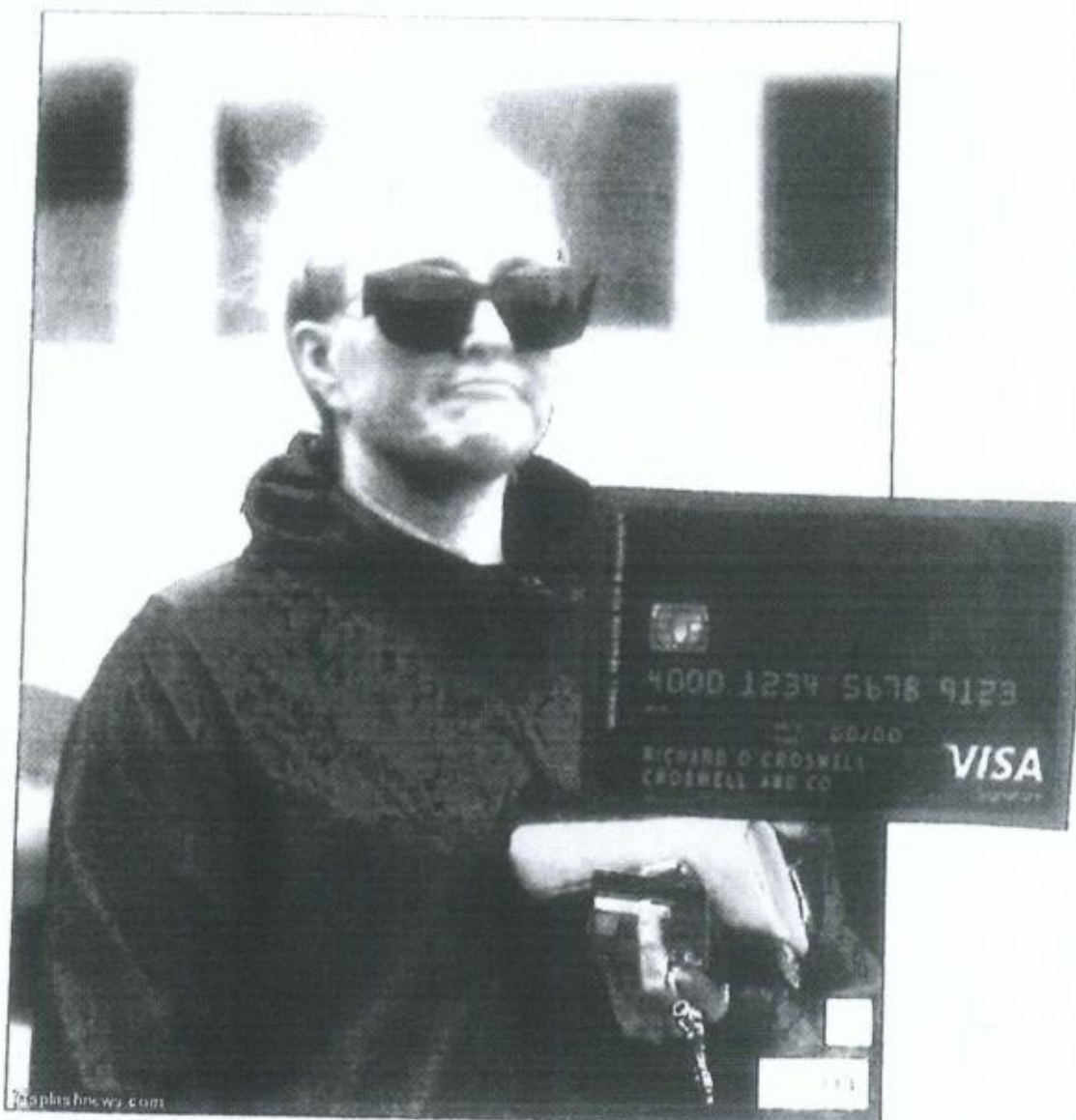
### Forward-Looking Statements

Certain statements contained in this news release may constitute "forward-looking" statements within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements represent the current expectations, plans or forecasts of Bank of America based on available information. Forward-looking statements can be identified by the fact that they do not relate strictly to historical or current facts. These statements often use words like "expects," "anticipates," "believes," "estimates," "targets," "intends," "plans," "predict," "goal" and other similar expressions or future or conditional verbs such as "will," "may," "might," "should," "would" and "could." Forward-looking statements speak only as of the date they are made, and Bank of America undertakes no obligation to update any forward-looking statement to reflect the impact of circumstances or events that arise after the date the forward-looking statement was made.

## **EXHIBIT 3**



By TRACY WRIGHT FOR DAILYMMAIL.COM  
PUBLISHED: 12:57 CDT, 2 September, 2021 | UPDATED: 13:54 EDT, 7 September, 2021



**Out and about:** Erika Jayne looked downcast while heading to the gym in an all-black ensemble in Los Angeles on Wednesday afternoon

The Pretty Mess author tied up her platinum blonde hair into a bun and wore a pair of oversized shades while carrying a bright yellow wallet.

**Learning:** She paid for a parking meter with a credit card after admitting on a that she 'only learned how to go to the bank in March'

**EXHIBIT A: UNAUTHORIZED USE BANK OF AMERICA MERRILL LYNCH FOR THE BENEFIT OF NICHOLAS PHIPPS WHITE VISA DEFERRED BUSINESS DEBIT CARD, SEPTEMBER 1, 2021, NEAR 1020 N PALM AVE, LOS ANGELES, CA**



CERTIFICATION OF VITAL RECORD

COUNTY OF VENTURA

VENTURA, CALIFORNIA

INFORMATIONAL, NOT A VALID DOCUMENT TO ESTABLISH IDENTITY

4052013181823

LICENSE AND CERTIFICATE OF MARRIAGE

4 2013 56004951 LOCAL REGISTRATION NUMBER

Form containing fields for first names (ERIKA, NICHOLE), birth dates, addresses, and signatures of witnesses and officiant.

CERTIFIED COPY OF VITAL RECORD STATE OF CALIFORNIA, COUNTY OF VENTURA



This is a true and exact reproduction of the document officially registered and placed on file with the Ventura County Clerk and Recorder.

DATE ISSUED JAN 11 2023

MICHELLE ASCENCION COUNTY CLERK AND RECORDER

This copy is not valid unless prepared on an engraved border displaying the date, seal and signature of the County Clerk and Recorder.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE





CERTIFICATION OF VITAL RECORD

# COUNTY OF VENTURA

VENTURA, CALIFORNIA

INFORMATIONAL, NOT A VALID DOCUMENT TO ESTABLISH IDENTITY

104 - 87 - 368429

CERTIFICATE OF LIVE BIRTH  
STATE OF CALIFORNIA

5600

6334

STATE BIRTH CERTIFICATE NUMBER		LOCAL REGISTRATION DISTRICT AND CERTIFICATE NUMBER	
1A. NAME OF CHILD—FIRST	11B. MIDDLE	11C. LAST	
NICHOLAS	BRITT	WHITE	
2. SEX	3A. THIS BIRTH, SINGLE, TWIN, ETC.	3B. IF MULTIPLE, THIS CHILD 1ST, 2ND, ETC.	4A. DATE OF BIRTH—MONTH, DAY, YEAR
Male	Single		September 21, 1987
14B. HOUR—(24 HOUR CLOCK TIME)		14C. DATE SIGNED	
0607		9-21-87	
5A. PLACE OF BIRTH—NAME OF HOSPITAL OR FACILITY		5B. STREET ADDRESS (STREET, NUMBER, OR LOCATION)	
Pleasant Valley Hospital		2309 Antonio Avenue	
5C. CITY OR TOWN		5D. COUNTY	
Camarillo		Ventura	
6A. NAME OF FATHER—FIRST	6B. MIDDLE	6C. LAST	7. STATE OF BIRTH
David	Britt	White	NY
8. AGE OF FATHER			40
9A. NAME OF MOTHER—FIRST	9B. MIDDLE	9C. LAST (BIRTH NAME)	10. STATE OF BIRTH
Linda	Marie	Olivier	IN
11. AGE OF MOTHER			39
PARENT'S CERTIFICATION	12A. PARENT OR OTHER INFORMANT—SIGNATURE		12B. RELATIONSHIP TO CHILD
	[Signature]		Mother
ATTENDANT'S CERTIFICATION	13A. PHYSICIAN OR OTHER ATTENDANT—SIGNATURE—DEGREE OR TITLE		13B. LICENSE NUMBER
	[Signature]		G 41252
14. TYPED NAME AND ADDRESS		13C. DATE SIGNED	
Maynard Belzer M.D., 2486 Ponderosa Drive, Camarillo		9-23-87	
15. DEATH—ENTER DATE OF DEATH	16. LOCAL REGISTRAR—SIGNATURE		17. DATE ACCEPTED FOR REGISTRATION
	[Signature]		OCT 02 1987

CERTIFIED COPY OF VITAL RECORD  
STATE OF CALIFORNIA, COUNTY OF VENTURA

This is a true and exact reproduction of the document officially registered and placed on file with the Ventura County Clerk and Recorder.

DATE ISSUED

JAN 11 2023

This copy is not valid unless prepared on an engraved border displaying the date, seal and signature of the County Clerk and Recorder.



001091729

*Michelle Ascencion*  
MICHELLE ASCENCION  
COUNTY CLERK AND RECORDER



CAVENTUR02

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE



FL-165

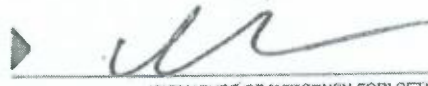
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Erika White</b> <b>3389 Bennett Drive</b> <b>Los Angeles CA 90068</b>  TELEPHONE NO.: <b>619 358 0496</b> FAX NO. (Optional): <b>213 289 1097</b> E-MAIL ADDRESS (Optional): <b>bejisima@gmail.com</b> ATTORNEY FOR (Name):	FOR COURT USE ONLY  <b>FILED</b> Superior Court of California County of Los Angeles  <b>MAY 09 2019</b>  Sherri R. Carter, Executive Officer/Clerk By <u>Samantha J. Steinel</u> , Deputy Samantha J. Steinel
SUPERIOR COURT OF CALIFORNIA, COUNTY OF <b>Los Angeles</b> STREET ADDRESS: <b>111 N. Hill Street</b> MAILING ADDRESS: CITY AND ZIP CODE: <b>Los Angeles 90012</b> BRANCH NAME: <b>Stanley Mosk</b>	
PETITIONER: <b>Erika White</b> RESPONDENT: <b>Nicholas White</b>	
<b>REQUEST TO ENTER DEFAULT</b>	CASE NUMBER: <b>18STFL10165</b>

1. To the clerk: Please enter the default of the respondent who has failed to respond to the petition.
2. A completed *Income and Expense Declaration* (form FL-150) or *Financial Statement (Simplified)* (form FL-155)
  - is attached  is not attached.
  - A completed *Property Declaration* (form FL-160)  is attached  is not attached because (check at least one of the following):
    - (a)  there have been no changes since the previous filing.
    - (b)  the issues subject to disposition by the court in this proceeding are the subject of a written agreement.
    - (c)  there are no issues of child, spousal, or partner support or attorney fees and costs subject to determination by the court.
    - (d)  the petition does not request money, property, costs, or attorney fees. (Fam. Code, § 2330.5.)
    - (e)  there are no issues of division of community property.
    - (f)  this is an action to establish parental relationship.

Date: **5/7/19**

**Erika White**

(TYPE OR PRINT NAME)



(SIGNATURE OF [ATTORNEY FOR] PETITIONER)

3. Declaration

- a.  No mailing is required because service was by publication or posting and the address of the respondent remains unknown.
- b.  A copy of this *Request to Enter Default*, including any attachments and an envelope with sufficient postage, was provided to the court clerk, with the envelope addressed as follows (address of the respondent's attorney or, if none, the respondent's last known address):

**Nicholas White**  
**1200 S. Grand Ave #550**  
**Los Angeles CA 90015**

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

Date: **5/7/19**

**Erika White**

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

FOR COURT USE ONLY <input checked="" type="checkbox"/> Request to Enter Default mailed to the respondent or the respondent's attorney on (date): <input type="checkbox"/> Default entered as requested on (date): <input type="checkbox"/> Default not entered. Reason:	<b>MAY 09 2019</b>  <b>MAY 09 2019</b> Clerk, by <u>Samantha J. Steinel</u> , Deputy Samantha Steinel
--	---

GIRARDI | K E E S E  
LAWYERS

December 8, 2019

**Amendment to Remove Co-Trustees on Merrill Lynch Account (Girardi, Rosenstein,  
Bradshaw)**

I, Thomas V. Girardi remove myself as Co-Trustee of the Palm Beach County Sheriffs' Office For the Benefit of Nicholas Phipps White or related trust business accounts containing the approximate deposits of \$5,658,691,268 opened at Bank of America/Merrill Lynch, Pierce, Fenner & Smith Incorporated on 401 East Las Olas Boulevard, Ft. Lauderdale, FL 33301 for which Mr. Nicholas Phipps White is the Beneficiary of.

  
\_\_\_\_\_  
Thomas V. Girardi


12-8-19  
\_\_\_\_\_  
Date

STATE OF CALIFORNIA        )  
  )  
COUNTY OF LOS ANGELES    )

On before me, Maria L. Carlos, Notary Public, personally appeared Thomas V. Girardi who proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person 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 of Notary Public





(When required)  
RECORDING REQUESTED BY AND MAIL TO:  
  
LOS ANGELES DAILY JOURNAL  
~ SINCE 1888 ~  
  
915 E FIRST ST, LOS ANGELES, CA 90012  
Mailing Address: P.O. Box 54026, Los Angeles, California 90054-0026  
Telephone (213) 229-5300 / Fax (213) 229-5481

This space for filing stamp only  
**FILED**  
Superior Court of California  
County of Los Angeles

JUN 07 2019

Sherri R. Carter, Executive Officer/Clerk of Court  
By C. Fiola, Deputy  
C. Fiola

Erika White  
ERIKA WHITE  
210 CATHEDRAL COVE, APT 16  
CAMARILLO, CA - 93012

DJ#: 3253825

ORDER TO SHOW CAUSE  
FOR CHANGE OF NAME  
Case No. 19STCP01701  
Superior Court of California, County of  
LOS ANGELES  
Petition of: Erika White for Change of  
Name  
TO ALL INTERESTED PERSONS:  
Petitioner Erika White filed a petition with  
this court for a decree changing names as  
follows:  
Erika Nichole White to Erika Nichole  
Salazar  
The Court orders that all persons  
interested in this matter appear before this  
court at the hearing indicated below to  
show cause, if any, why the petition for  
change of name should not be granted.  
Any person objecting to the name  
changes described above must file a  
written objection that includes the reasons  
for the objection at least two court days  
before the matter is scheduled to be  
heard and must appear at the hearing to  
show cause why the petition should not  
be granted. If no written objection is timely  
filed, the court may grant the petition  
without a hearing.  
Notice of Hearing:  
Date: 07/09/2019, Time: 10:30am, Dept.:  
44  
The address of the court is 111 N Hill  
Street Los Angeles CA 90012  
A copy of this Order to Show Cause shall  
be published at least once each week for  
four successive weeks prior to the date  
set for hearing on the petition in the  
following newspaper of general  
circulation, printed in this county: LOS  
ANGELES DAILY JOURNAL  
Date: 5/6/2019  
Judge Moreton  
Judge of the Superior Court  
5/15, 5/22, 5/29, 6/5/19  
DJ-3253825#

19stcp01701  
719

PROOF OF PUBLICATION

(2015.5 C.C.P.)

State of California )  
County of Los Angeles ) ss

Notice Type: OSC - ORDER TO SHOW CAUSE/NAME CHANGE

Ad Description:  
19STCP01701 White

I am a citizen of the United States and a resident of the State of California; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer and publisher of the LOS ANGELES DAILY JOURNAL, a newspaper published in the English language in the city of LOS ANGELES, county of LOS ANGELES, and adjudged a newspaper of general circulation as defined by the laws of the State of California by the Superior Court of the County of LOS ANGELES, State of California, under date 04/26/1954, Case No. 599,382. That the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

05/15/2019, 05/22/2019, 05/29/2019, 06/05/2019

Executed on: 06/05/2019  
At Los Angeles, California

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

*[Handwritten Signature]*

Signature



Email \* A 0 0 0 0 0 5 1 1 7 3 7 0 \*

06/10/2019





Bank of America Financial Office, 100 Larchmont Blvd, Los Angeles, CA 90004 temporary closure sign stating that “due to circumstances beyond our control, we are temporarily closed” and Bank of America’s “Erica app” designated in yellow.



BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR  
DEPARTMENT OF CONSUMER AFFAIRS • OSTEOPATHIC MEDICAL BOARD OF CALIFORNIA  
1300 National Drive, Suite 150, Sacramento, CA 95834  
P (916) 928-8390 | F (916) 928-8392 | [www.ombc.ca.gov](http://www.ombc.ca.gov)



July 27, 2022

NICHOLAS P. WHITE  
324 SOUTH BEVERLY DRIVE, SUITE 489  
BEVERLY HILLS, CA 90211

Re: NAREK HAMO TOROSYAN, D.O.  
Case No. 900 2022 000371

Dear NICHOLAS P WHITE:

This letter serves as confirmation of your complaint against the referenced.

Please note the review process may take **several months**. If we need additional information during the course of our inquiry, a representative of this Board will contact you.

Please note this Board is only authorized to take action against those individuals it finds in violation of the Medical Practice Act.

We appreciate your patience and wish to thank you for bringing your concerns to our attention. You will be advised of any action we take in this matter.

If you have any questions, please contact this office at (916) 928-8390.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth Dutchler".

Beth Dutchler  
Enforcement Analyst

**EXHIBIT 4**



This page is part of your document - DO NOT DISCARD



20190637529



Pages:  
0002

Recorded/Filed In Official Records  
Recorder's Office, Los Angeles County,  
California

07/02/19 AT 08:00AM

FEES:	32.00
TAXES:	670,600.00
OTHER:	0.00
<hr/>	
PAID:	670,632.00



LEADSHEET



201907020120029

00016817707



009938292

SEQ:  
14

DAR - Title Company (Hard Copy)



THIS FORM IS NOT TO BE DUPLICATED

RECORDING REQUESTED BY

FIDELITY NATIONAL TITLE  
RECORDING REQUESTED BY:  
FIDELITY NATIONAL TITLE COMPANY

AND WHEN RECORDED MAIL TO:

594 Mapleton LLC, a California Limited Liability Company  
c/o Dennis Roach, Esq.  
9200 Sunset Blvd., # 525  
Los Angeles, Ca 90069

Order No.: 995-30031008-JS3  
Escrow No.: 4510219-01826-MN  
A.P.N.: 4359-013-032

RA:00067



SPACE ABOVE THIS LINE IS FOR RECORDER'S USE  
**GRANT DEED**

THE UNDERSIGNED GRANTOR(S) DECLARE(S)  
DOCUMENTARY TRANSFER TAX IS \$131,725.00  
[ XX ] computed on full value of property conveyed, or  
[ XX ] City of LOS ANGELES AND

CITY TRANSFER TAX IS \$538,875.00

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,  
**Petra Ecclestone**, a single woman, as her sole and  
separate property  
hereby GRANT(S) to  
**594 Mapleton LLC, a California Limited Liability Company**

Exempt from fee per GC 27388.1 (a) (2);  
recorded concurrently in connection with  
a transfer subject to the imposition of  
documentary transfer tax

the following described real property in the County of Los Angeles, State of California:

Parcels A, B and C of Parcel Map L.A. No. 4847, in the City of Los Angeles, County of Los Angeles, State of California, as per Map Recorded in Book 151, Page 51 of Parcel Maps, in the Office of the County Recorder of said County.

Dated: June 20, 2019

Petra Ecclestone

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.

STATE OF CALIFORNIA  
COUNTY OF Los Angeles JSS.

On June 21, 2019 before me MICHAEL GERHT, Notary Public, personally appeared Petra Ecclestone

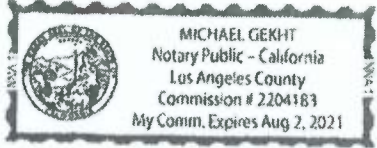
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and that by his/her/their signature(s) on the instrument the person(s), 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   
Signature of Notary

Commission Expiration Date: AUG. 02, 2021



MAIL TAX STATEMENTS: To the parties as shown above

1410



Company: West Coast Escrow Office: Beverly Hills File #: 4510219-01826 Property: 594 S Mapleton Dr

Today Dashboard File Entry Closings Doc Center Communication Center Accounting/Appro

**Edit Order**

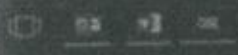
General Information Coordinators Property Buyers Sellers Finance

**Contacts**

Cust Type	Company Name	Contact Name	Phone No
Services	WIRE DEPARTMENT	WIRE DEPARTMENT	(856)914-2668
Other	DEPARTMENT OF WATER AND POWER		(856)284-6130
CD Settlement Agent	West Coast Escrow Beverly Hills	Minnie Ng	(310)268-0101
Listing Agent	COLDWELL BANKER REALTY	JADE MILLS	(310)273-3113
Listing Agent	THE AGENCY	DAVID PARNES	(424)230-3700
Listing Agent	WESTSIDE ESTATE AGENCY	KURT RAPPAPORT	(310)247-7770
Listing Agent	THE AGENCY	JAMES HARRIS	(424)230-3700
Selling Agent	HILTON & HYLAND REAL ESTATE	JEFF HYLAND	(310)278-3311
Selling Agent	HILTON & HYLAND REAL ESTATE	(New)BROOKE HALSEBAND	(310)278-3311
Lender 1			
Mortgage Broker 1			
Payoff Lender 1	(New)SLAVICA ECCLESTONE	(New)SLAVICA ECCLESTONE	(818)917-7803
Services	BRAD	STATEWIDE SERVICES	
Services	WIRE DEPARTMENT		(856)914-2668
Title Company	FIDELITY NATIONAL TITLE COMPANY	(New)JUSTIN SCOTT	(213)452-7110

Cancel Save

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MINI ZEN GARDEN



News | Homes | Interiors | Investing | Features

# Mystery seller places 'Spelling Manor' on market for \$165 million

Gallery View | Expand View

One of LA's grandest homes has had a huge price increase



Coldwell Banker / Westside Estate A

A super-luxury Californian estate – known as The Manor – million (£121m) just three years after it sold for just shy of House and boasting 123 rooms, let's take a look inside this history...

**A grand estate**

Read more



## **New Cases Allege Bank of America / Merrill Lynch Aided and Abetted 'Real Housewives' Tom and Erika Girardi Massive Fraud Scheme in Posing as Victim's Father and Widow to Steal \$27.459B of Victim's Sovereign Towers Settlement and Purchase of Spelling Manor: Bank Still Refusing to Help the Victims**

Jul 14, 2022 11:45 AM ET

Legal Newswire POWERED BY LAW.COM

Contact: [pressinquiries@thehollywoodlanddevelopmentcompany.com](mailto:pressinquiries@thehollywoodlanddevelopmentcompany.com)

**BEVERLY HILLS, CALIFORNIA, USA** - The unopposed civil case for negligence is for the return from Berkshire Hathaway (NYSE: BRK) owned-Bank of America Corporation (NYSE: BAC) for the Victim and Plaintiff, Chairman and CEO of The Hollywood Land Development Company LLC, Nicholas Phipps White's \$27.459 billion Sovereign Towers settlement, issued as a U.S. Treasury check, in addition to the return of the Victim's home from West Coast Escrow Company, a subsidiary of Anywhere Real Estate Inc. (NYSE: HOUS), titled by Fidelity National Title, a subsidiary of Fidelity National Financial (NYSE: FNF).

The negligence case filed more than a year ago on June 7, 2021 *Nicholas Phipps White vs. Bank of America, N.A. and Merrill Lynch, Pierce, Fenner and Smith Incorporated*, which in part will assist the 500+ Victims owed \$517,000,000 of the Girardi Bankruptcy, has been assigned to former U.S. Navy JAG, The Honorable Judge Mark Blumstein of the Miami-Dade County, Florida 11<sup>th</sup> Circuit Court. An additional civil fraud case was filed on July 2, 2022 in the United States District Court for the Central District of California with the Honorable Federal Judge George H. Wu *Nicholas Phipps White vs. Anywhere Real Estate Inc.* for Anywhere Real Estate Inc. for the return of the Victim's home by correcting the grant deed for the Plaintiff regarding the property located at 594 South Mapleton Drive, Los Angeles, CA 90024 (APN: 4359-013-032), also known as the "Spelling Manor", which was purchased with the Victim's funds from Bank of America / Merrill Lynch global consumer account (649-13284) without his knowledge on July 2, 2019.

The unopposed Bank of America lawsuit alleges that "the Defendants" Bank of America's CEO Brian T. Moynihan and Merrill Lynch's President Andrew Sieg, were negligent in allowing a global Merrill Lynch consumer account (649-13284) to be fraudulently opened three years ago, on June 7, 2019 at the Merrill Lynch Coral Gables, FL location more than 3,000 miles away from and without the Plaintiff's knowledge an existing customer of Bank of America and resident of California, with a fraudulent Italian passport and a forged unrecorded birth certificate for the Plaintiff by disgraced and disbarred attorney Tom Girardi, naming 83-year old Girardi as his father, and a fraudulent unrecorded marriage certificate naming 51-year old Erika Girardi, posing as a fictitious "Erika White", as his wife and now widow. The fraudulent Italian passport Bank of America accepted was illicitly obtained from the Italian Consulate in San Francisco by Tom Girardi (who was actually born in Italy and immigrated to the U.S. in 1954) with now expired immigration papers. Girardi could face deportation from the United States.

Disgraced Tom Girardi's 51-year old wife, the *Real Housewives of Beverly Hills (RHOBH)* reality performer, Erika Nichole Girardi (aka Erika Jayne), fraudulently posed as a fabricated "Erika White", who perpetrated to be the wife and widow of Plaintiff, Nicholas Phipps White, Chairman and CEO of The Hollywood Land Development Company in California. Bank of America/Merrill Lynch aided and abetted Erika Girardi by accepting, among other forged documents, illegitimate and unrecorded Letters of Probate, granting her control as the Administrator of the Merrill Lynch global consumer account (649-13284). Bank of America's Former U.S. Secretary of State and U.S. Senator John Kerry served as Bank of America's Global Advisory Council Chairman which included Bank of America's CEO Brian Moynihan from October 2017 - January 2021 knew the actual Plaintiff's father from Yale University in New Haven, Connecticut where the Plaintiff was born, Managing Director of the Sovereign Towers, architect Mr. Lawrence Phipps White, grandson of U.S. Senator Lawrence Phipps, former Treasurer of Carnegie Steel, now part of U.S. Steel.

The Girardi's scheme, aided and abetted by Bank of America, was intentionally done in order to conceal the \$27.459 billion-dollar Sovereign Towers settlement and to prevent the Plaintiff Nicholas Phipps White, who is the legitimate owner of the account (649-13284), to not have any access to even one dollar of his account, while the Defendants allowed Erika Girardi and others to unlawfully spend from the Plaintiff's global account. Additionally, Bank of America / Merrill Lynch issued more than 25+ unauthorized Visa debit cards to Erika Girardi from the Plaintiff's global account for a vast network of friends, political operatives, and associates of the Democrat political fundraiser Tom Girardi and his wife Erika Girardi to illicitly use. Previously, Bank of America had allowed fraudulent money transfers from the Plaintiff's Merrill Lynch account (649-13284) to the vast network of friends, political operatives and associates of Tom and Erika Girardi across 16 states through Bank of America's "Erica" virtual financial assistant launched in June 2018, and utilized the Bank of America-owned "Zelle" payment platform which allows transfer of funds of \$2,500 daily from the Plaintiff's account, assisted by Devon Investment Advisory, owned by Archer Systems, investment advisor associates of Tom Girardi's that Bank of America illicitly approved, with Devon Investment Advisory previously terminated by SEC. Subsequently, beginning in April 2021, Bank of America converted more than \$14 billion of Nicholas Phipps White's funds from his Merrill Lynch global account to Bank of America's "\$25 billion stock buy-back" that was announced in early 2021.



Other unauthorized transactions Bank of America aided and abetted the Girardi's with [redacted] included the wire transfer from the Merrill Lynch account (649-13284), in the amount of \$119,750,000 for the purchase on July 2, 2019, disguised as an LLC without his knowledge as the "anonymous buyer" of the alleged "birthday present" for the Plaintiff's wife of the "Spelling Manor" located at 594 South Mapleton Drive in Los Angeles, CA 90024 (APN: 4359-013-032). This property was co-listed by The Agency and Anywhere Real Estate Inc.'s Coldwell Banker Realty and the Plaintiff was disguised as an "anonymous buyer" represented by the recently deceased Jeff Hyland of Hilton & Hyland with the escrow by West Coast Escrow Company of Beverly Hills, CA and titling of the property by Fidelity National Title Group of Los Angeles.

Subsequently, Nicholas Phipps White, without his knowledge of the home purchase, has been subjected to paying monthly utility bills from his global Merrill Lynch account that were as high as \$29,932.70 to the Los Angeles Department of Power and Water, while the vast network of friends, political operatives and associates of Tom and Erika Girardi, used the Plaintiff's house for lavish entertaining. Additionally, the Plaintiff's home was illicitly managed by staff from ABM Industries (NYSE: ABM) brought in from their New York offices at One Liberty Plaza, the building of the original headquarters of Merrill Lynch. The Plaintiff has been subjected to paying from the Plaintiff's Merrill Lynch account for lavish around-the-clock "embassy style" security services to ABM for the Girardi's and their friends, operatives, and associates at the Plaintiff's home.

The current listing of the Spelling Manor property initiated by Erika Girardi posing "Erika White" as the widow of the Plaintiff, was suspended on March 22, 2022 after the fraudulent wire from Bank of America from the July 2, 2019 purchase of the Spelling Manor was reported by the Plaintiff, the owner of the home, to U.S. Attorney General Garland at the U.S. Department of Justice.

The Plaintiff, Mr. Nicholas Phipps White, who is an existing customer of Bank of America, had previously and urgently attempted to contact Bank of America's Chairman and CEO Brian T. Moynihan more than 104 times to report the massive fraud and unconscionable acts allowed to be committed by Tom and Erika Girardi. In fact, Bank of America's CEO Brian Moynihan had previously known Tom Girardi and received payment from the Plaintiff's Merrill Lynch account to aid and abet the fraud. The Plaintiff has also requested the immediate closure of his Merrill Lynch account (649-13284) and the return of his funds. Brokers' licenses for both Bank of America's Brian Moynihan, Merrill Lynch's President Andrew Sieg and Devon Investment Advisory owned by Archer Systems misconduct, were reported to the Securities and Exchange Commission, which is regulated by Financial Industry Regulatory Authority (FINRA).

The missing U.S. Treasury Sovereign Towers settlement check from February 26, 2021, which was reported on April 26, 2021 to U.S. Attorney General Merrick Garland and occurred during the tenure of Acting U.S. Attorney General Monty Wilkinson and U.S. Treasury Secretary Janet Yellen, was given to and illicitly deposited by Erika Girardi (who was posing as the Plaintiff's widow Erika White) into the Merrill Lynch global account (649-13284). The subsequent 25+ Visa debit card fraud at Merrill Lynch, has been properly reported to U.S. Attorney Garland on September 8, 2021 which led to one of the largest financial institution leadership shakeups announced by Bank of America on September 10, 2021. The U.S. Attorney's Office for the Central District of California, California Attorney General Rob Bonta and Los Angeles Police Department (LAPD) Sheriff Alex Villanueva had been notified regarding the fraud.

Additionally, the matter for the return of the Sovereign Towers settlement to the Plaintiff had been submitted by the Plaintiff's Senator Dianne Feinstein to the bi-partisan U.S. Senate Judiciary Committee in regards to outreach for the Girardi Victims to Attorney General Garland at the U.S. Department of Justice. Moreover, the U.S. Secretary of Homeland Security Alejandro Nicholas Mayorkas has been notified regarding the passport fraud at Bank of America by Italian native Tom Girardi on U.S. citizen Nicholas Phipps White at the Italian Consulate in San Francisco, whose previous Consul General Lorenzo Ortona abruptly departed in June 29, 2021 after the Bank of America was filed on June 7, 2021.

The violations by the realtors and attorneys regarding the Spelling Manor, which include fellow realty cast members: Rick Hilton of Hilton & Hyland and Mauricio Umansky of The Agency, in addition to Coldwell Banker Realty Tony Papillo, Jade Mills and Michael Caruso, Broker for California for The Agency, have been reported to the California Department of Real Estate for investigation. Attorney misconduct complaints have been filed to the California State Bar on Tom Girardi of the now defunct Girardi & Keese law firm, in addition, to Bank of America's owner Berkshire Hathaway's Vice-Chairman attorney Charlie Munger, friend of Girardi and fellow Pasadena, CA resident, founder of the law firm Munger, Tolles and Olson of Los Angeles and who recently resigned on March 28, 2022, as Chairman of The Daily Journal Corporation (NASDAQ: DJCO) after the fraud was reported to the Attorney General Garland on March 22, 2022 that his publication *The Daily Journal* in Los Angeles aided Erika Girardi in running a fraudulent legal notice for the illegitimate manufactured "Erika White" Bank of America accepted.

In addition, attorney complaints were submitted on California attorney Dennis Roach of Clinton Development Inc. who posed as a fraudulent property manager for the Plaintiff's property "Spelling Manor" and CEO of 594 Mapleton LLC, and developer/real estate attorney Rick Caruso, current Los Angeles mayoral candidate, friend of Tom Girardi and related to Michael Caruso from The Agency, which the California State Bar records show surrendered his law license on July 2, 2019, the day of the 594 South Mapleton Drive, Los Angeles, CA 90024 transaction from the Plaintiff's Bank of America/Merrill Lynch global account.

The illegitimate unrecorded death certificate Bank of America/Merrill Lynch accepted from Erika Girardi posing as the Plaintiff's widow was signed in 2020 by resident student Dr. Narek O. Torosyan DO for which he received payment from the Plaintiff's Merrill Lynch account, which in part was used to pay off his medical school loans. Dr. Torosyan had worked with Tom Girardi's celebrity family physician, San Francisco-native Dr. James Keller Wortham MD from the Optimum Wellness Group of Glendale, CA, formerly the practice of deceased Church of Scientology physician, Dr. G. Meghan Shields who died in 2016. Consequently, Dr. Wortham's partner

**EXHIBIT 5**



Recorded Official Records, Orange County  
Hugh Nguyen, Clerk-Recorder



\* \$ R 0 0 1 4 0 2 1 0 0 4 \$ \*  
2022000341130 4:14 pm 10/20/22

214 CR-SC05 G02 3 07  
30250.00 30250.00 0.00 0.00 6.00 0.00 0.000.000.00 0.00

RECORDING REQUESTED BY:  
Fidelity National Title  
Order No. 00362034-994  
Escrow No. 64204-GJ  
Parcel No. 489-181-06

AND WHEN RECORDED MAIL TO:

US NO. 8 LLC, A CALIFORNIA  
LIMITED LIABILITY COMPANY  
2 CORAL RIDGE  
NEWPORT BEACH, CA 92657

SPACE ABOVE THIS LINE FOR RECORDER'S USE

### GRANT DEED

THE UNDERSIGNED GRANTOR(S) DECLARE(S) THAT DOCUMENTARY TRANSFER TAX IS \$60,500.00

- computed on full value of property conveyed, or
- computed on full value less liens or encumbrances remaining at the time of sale.
- unincorporated area:  Newport Beach, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

**Terry Dubrow and Heather Dubrow, Co-Trustees of The Dubrow Family Trust Dated November 27, 2017**

hereby GRANT(S) to

**US No. 8 LLC, A California Limited Liability Company**

the following described real property in the County of Orange, State of California:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF.

Commonly known as: **2 Coral Ridge, Newport Beach, CA 92657**

Date September 28, 2022

Terry Dubrow and Heather Dubrow, Co-Trustees of  
The Dubrow Family Trust Dated November 27, 2017

Terry A. Dubrow  
By: Terry Dubrow, Co-Trustee  
TERRY DUBROW

Heather Dubrow  
By: Heather Dubrow, Co-Trustee  
HEATHER DUBROW

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.

STATE OF CALIFORNIA )S.S.  
COUNTY OF Orange

On October 2, 2022, before me, Brittany Barr, Notary Public,  
personally appeared Terry Dubrow and Heather Dubrow

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 BB (Seal)





**EXHIBIT A**  
**LEGAL DESCRIPTION**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF NEWPORT BEACH, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

**PARCEL 1**

LOT 44 OF TRACT NO. 16457, IN THE CITY OF NEWPORT COAST, COUNTY OF ORANGE, STATE OF CALIFORNIA, AS SHOWN ON A MAP RECORDED IN BOOK 873, PAGES 33 THROUGH 47, INCLUSIVE, OF MISCELLANEOUS MAPS IN THE OFFICE OF THE COUNTY RECORDER FOR ORANGE COUNTY, CALIFORNIA, AND AS CORRECTED BY THAT CERTAIN CERTIFICATE OF CORRECTION RECORDED AUGUST 22, 2007 AS INSTRUMENT NO. 2007-0522883 OF OFFICIAL RECORDS OF SAID ORANGE COUNTY.

EXCEPTING THEREFROM, ALL OIL, MINERAL AND OTHER RELATED RIGHTS AS RESERVED TO THE IRVINE COMPANY LLC, ITS SUCCESSORS AND ASSIGNS, IN THE GRANT DEED RECORDED ON APRIL 18, 2003, AS INSTRUMENT NO. 2003-000436059 OF OFFICIAL RECORDS.

**PARCEL 2;**

NONEXCLUSIVE EASEMENTS FOR INGRESS, EGRESS, ACCESS, MAINTENANCE, REPAIRS, DRAINAGE, SEWER LATERAL CONNECTIONS, ENCROACHMENT, SUPPORT, USE, ENJOYMENT AND ALL OTHER PURPOSES AS MORE PARTICULARLY SET FORTH IN THE MASTER DECLARATION, NOTICE OF ANNEXATION, CUSTOM LOT DECLARATION, AMENDMENT TO CUSTOM LOT DECLARATION, THE DECLARATION ESTABLISHING ACCESS EASEMENT RIGHTS AND CUSTOM LOT ENTRY GATE SPECIAL BENEFIT AREA REFERENCED BELOW, COMPLETION OF CONSTRUCTION OF DWELLINGS SUPPLEMENTAL DECLARATION REFERENCED BELOW, REAR SEWER LATERAL SUPPLEMENTARY DECLARATION REFERENCED BELOW, IF APPLICABLE, AND DRIVEWAY EASEMENT DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS RECORDED SEPTEMBER 27, 2000, AS INSTRUMENT NO. 2000-511085, OF OFFICIAL RECORDS.

**APN: 489-181-06**

**EXHIBIT 6**



This page is part of your document - DO NOT DISCARD



20230105234



Pages:  
0004

Recorded/Filed in Official Records  
Recorder's Office, Los Angeles County,  
California

02/17/23 AT 08:00AM

FEEES:	28.00
TAXES:	308,000.00
OTHER:	0.00
<hr/>	
PAID:	308,028.00



LEADSHEET



202302173270014

00023205592



013924953

SEQ:  
01

SECURE - 8:00AM



THIS FORM IS NOT TO BE DUPLICATED

RECORDING REQUESTED BY:  
FIDELITY NATIONAL TITLE COMPANY

AND WHEN RECORDED MAIL TO:  
US No.3 LLC  
71 Beverly Park  
Beverly Hills, CA 90210

Order No.: 00368341-994AW  
Escrow No.: 4510223-00293-BB  
A.P.N.: 4386-013-020

SPACE ABOVE THIS LINE IS FOR RECORDER'S USE  
**GRANT DEED**

THE UNDERSIGNED GRANTOR(S) DECLARE(S)  
DOCUMENTARY TRANSFER TAX IS \$ 60,500.00 CITY TRANSFER TAX IS \$ 247,500.00

- computed on full value of property conveyed, or
- computed on full value less value of liens or encumbrances remaining at time of sale.
- unincorporated area     City of Los Angeles AND

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,  
**Mark R. Wahlberg, Trustee of Mark Wahlberg Trust dated 11.11.2002**  
hereby GRANT(S) to  
**US No.3 LLC, a California LLC**

the following described real property in the County of **Los Angeles**, State of California:

See Exhibit "A" attached hereto and made a part hereof for complete legal description.

AKA: 71 Beverly Park, Beverly Hills, CA 90210  
Dated: January 19, 2023

Mark Wahlberg Trust dated 11.11.2002

By: Mark R. Wahlberg, Trustee

*MARK R. WAHLBERG*

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.

STATE OF CALIFORNIA  
COUNTY OF Los Angeles )SS.

On February 15, 2023 before me Anne E. Larkin Notary Public, personally appeared Mark R. Wahlberg 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.

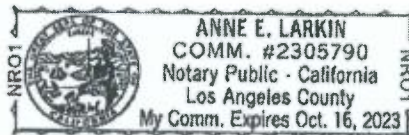
Signature

*Anne E. Larkin*

Signature of Notary

Commission Expiration Date:

10/16/2023



MAIL TAX STATEMENTS: To the parties as shown above



# TRUE COPY CERTIFICATION

(Government Code 27361.7)

Los Angeles, **California**  
Place of Execution (City and State)

I certify under penalty of perjury that this material is a true copy of the original material contained in this document.

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.

State of \_\_\_\_\_  
County of \_\_\_\_\_

On \_\_\_\_\_ before me, \_\_\_\_\_, Notary Public personally appeared \_\_\_\_\_, 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 \_\_\_\_\_ (Seal)

eRecording Partners Network

2/16/2023

Date

By: [Signature]  
Signature of Declarant

Marta Bautista  
Type or Print Name





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HOME / MOGULS / POWER PLAYERS

## Mark Wahlberg's \$55 Million Mansion Sold to Buyer of Heather Dubrow's Newport Chateau

By James McClain February 23, 2023 6:56 pm PT



Anthony Barcelo; YouTube; Aaron Davidson/Getty Images; JB Lacroix/Stringer/WireImage

Seller	<b>Mark Wahlberg</b>
Location	<b>Beverly Park, Los Angeles, Calif.</b>
Price	<b>\$55 million</b>
Year	<b>2014</b>

[VIEW MORE](#)

It wasn't quite the blockbuster sale he originally wanted, but Mark Wahlberg has nonetheless managed to unload his palatial Los Angeles mansion. The unapologetically opulent mansion, located within the infamous Beverly Park enclave, went for \$55 million in a cash deal.

The unnamed foreign buyers were widely rumored to hail from Asia, and property records now indicate they have ties to Hong Kong and China. But beyond that, records also confirm these are the very same shadowy individuals — their names remain a mystery, for now — four months ago dropped *another* \$55 million for the titanic mansion of reality TV stars Terry and Heather Dubrow, down on California's Pacific Palisades. <https://www.dirt.com/gallery/moguls/power-players/mark-wahlberg-house-sold-beverly-park-1203620385/>

er. Custom-built for the actor, created by mega architect Richard Landry and decorated by noted designer Annette English, the ornate French-style behemoth crushes the proverbial more than 30,000 square feet of living space. There are 12 bedrooms and an incredible 20 bathrooms scattered around the 6-acre compound which includes a massive main house and several additional structures.

Wahlberg acquired the property way back in 2009 as vacant land, paying only about \$8 million, and the highly individualistic estate was completed circa 2014. First listed nearly a year ago at \$87.5 million, the estate's asking price dipped to \$79 million before the buyers came with their lowball offer. While \$55 million is still impressive, it's nowhere near Beverly Park's price record — \$70 million, set last year by Hong Kong tycoon Hao Tang. Just a few weeks before that, Adele paid \$58 million for Sylvester Stallone's Beverly Park digs.

Home highlights are almost too numerous to recount, but they include a two-story library, a living room with two fireplaces, a gourmet kitchen with two islands, a mirror-walled gym, wine cellar with tasting room, movie theater and upstairs master retreat with decadently bespoke closets and marble bathrooms.

Outside, the estate features a huge motorcourt with parking for dozens of cars, manicured gardens, a tennis court with viewing pavilion, a custom skate park, a detached guesthouse and grotto-style pool with waterfalls and Baja sunbathing shelves.

Wahlberg and wife Rhea Durham are moving to Las Vegas, where last year they spent more than \$30 million to buy a luxury mansion on parcels of vacant land.

As for the mystery buyers, who have now spent \$110 million in four months on two ultra-luxe SoCal homes, we'd guess they will use the Beverly Park mansion as their main residence, and the Newport Coast villa as a very swank vacation home, though that remains to be confirmed.

Photo : Anthony Barcelo

ADVERTISEMENT



**EXHIBIT 7**



**PHIPPS**

June 1, 2022

Avenue 5 Residential  
CEO Mr. Walt Smith  
Avenue 5 California Inc. (02034255)  
7545 Irvine Center Drive; Suite 200  
Irvine, CA 92618; attn: Corporate Officer Gerard Stephen Donohue Jr. (License No. 01265072)

**VIA EMAIL (URGENT)**

**NOTICE OF REQUEST TO TERMINATION OF LEASE FROM MAY 2019 TO PRESENT**

Dear Mr. Smith:

My name is Nicholas Phipps White, Chairman and CEO of The Hollywood Land Development Company. I am 53 years old and a California resident. Please have this serve as NOTICE that in regards to the G12 Apartments that you manage at 1200 South Grand Avenue, Los Angeles, CA 90015, apartment #550 that was rented to an alleged "Nicholas White", who in reality is the step-son of disbarred, disgraced former attorney Thomas V. Girardi of defunct Girardi and Keese. As of Monday, April 4, 2022 the unauthorized individual continues to reside in the unit #550 at G20 apartments and continues to commit identity theft (please see "Exhibit A") respectively.

I understand your lease records would have the same signature from the court records which are those of Tom Girardi. Disgraced attorney Tom Girardi, an immigrant from Italy with falsified and expired immigration papers, has fraudulently posed as my father, and even went so far as to forge birth certificates and illegally obtain an Italian passport in an illicit effort to open a Bank of America/Merrill Lynch global account. In fact, Tom Girardi, in addition to his wife Erika Girardi and other associates and accomplices are currently under Federal Investigation.

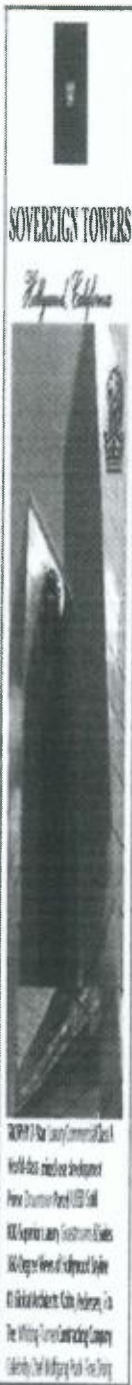
Please be clear, that I have never authorized the rental of this apartment unit #550. It appears there is a male, age 27, by the real name of Thomas Zizzo, who has been living in apartment unit #550. The monthly rent for apartment unit #550 has been illicitly paid from my Bank of America / Merrill Lynch account: 649-13284. Documents showing this address in other related falsified court records from May 09, 2019, have been reported to local, state and Federal law enforcement offices in California. The Honorable U.S. Attorney General Garland of the U.S. Department of Justice has been notified on March 22, 2022, and again on April 19, 2022. I reported to DOJ that it was discovered that a property in Los Angeles, CA was rented without my knowledge.

We understand that the records show at the California Department of Real Estate that a license for Avenue 5 has been surrendered. This matter will be reported to the appropriate agencies respectively for current/retroactive action and immediate of investigation of serious fraud and grave misconduct. I can be reached directly at (415) 539-6760 or at email: [mw@thehollywoodlanddevelopmentcompany.com](mailto:mw@thehollywoodlanddevelopmentcompany.com) to confirm this matter has been closed immediately.

Respectfully submitted,

**NICHOLAS PHIPPS WHITE**  
324 South Beverly Drive, Suite 489  
Beverly Hills, CA 90212 (415) 539-6760  
[ceo@thehollywoodlanddevelopmentcompany.com](mailto:ceo@thehollywoodlanddevelopmentcompany.com)

cc: U.S. Attorney General of the United States, Merrick B. Garland; U.S Attorney Tracy Wilkison Central CA; California Attorney General Rob Bonta; Los Angeles County Sheriff Alex Villanueva



Developed by The Hollywood Land Development Company LLC



**Resident Ledger**



Date: 06/01/2022

<b>Code</b>	t1556050	<b>Property</b>	sc18016	<b>Lease From</b>	08/02/2021
<b>Name</b>	Nicholas White	<b>Unit</b>	550	<b>Lease To</b>	08/01/2022
<b>Address</b>	1200 S Grand Avenue	<b>Status</b>	Current	<b>Move In</b>	04/18/2018
	550	<b>Rent</b>	2095.00	<b>Move Out</b>	
<b>City</b>	Los Angeles, CA 90015	<b>Phone (H)</b>	(818) 355-4317	<b>Phone (W)</b>	

Date	Chg Code	Description	Charge	Payment	Balance	Chg/Rec
04/18/2018	sdep	Security Deposit on Hand at Conversion	500.00		500.00	8279621
04/18/2018	petd	Pet Deposit on Hand at Conversion	50.00		550.00	8279622
04/18/2018				500.00	50.00	3108873
04/18/2018				50.00	0.00	3108874
11/01/2019	rent	Rent (11/2019)	2,034.00		2,034.00	8289431
11/01/2019	prkg	Parking (11/2019)	175.00		2,209.00	8289741
11/01/2019	utsf	Other Reimbursed Costs - 11/01/19-11/30/19	7.60		2,216.60	8298464
11/01/2019	rele	Reimbursed Electric - 08/28/19-09/27/19	52.47		2,269.07	8298465
11/01/2019	rgas	Reimbursed Gas - 09/01/19-10/01/19	8.18		2,277.25	8298466
11/01/2019	rpes	Reimbursed Pest Control - 09/01/19-10/01/19	3.00		2,280.25	8298467
11/01/2019	rsew	Reimbursed Sewer - 09/01/19-10/01/19	12.58		2,292.83	8298468
11/01/2019	rtra	Reimbursed Trash - 09/01/19-10/01/19	5.86		2,298.69	8298469
11/01/2019	rwat	Reimbursed Water - 09/01/19-10/01/19	15.70		2,314.39	8298470
11/06/2019		chk# :ACH-WEB Online Payment - EFT Payment. Mobile Web - Resident Services		2,314.39	0.00	3145385
12/01/2019	utsf	Other Reimbursed Costs - 12/01/19-12/31/19	7.60		7.60	8509265
12/01/2019	rele	Reimbursed Electric - 09/27/19-10/29/19	72.51		80.11	8509266
12/01/2019	rgas	Reimbursed Gas - 10/01/19-11/01/19	7.78		87.89	8509267
12/01/2019	rpes	Reimbursed Pest Control - 10/01/19-11/01/19	3.00		90.89	8509268
12/01/2019	rsew	Reimbursed Sewer - 10/01/19-11/01/19	15.74		106.63	8509269
12/01/2019	rtra	Reimbursed Trash - 10/01/19-11/01/19	7.72		114.35	8509270
12/01/2019	rwat	Reimbursed Water - 10/01/19-11/01/19	21.41		135.76	8509271
12/01/2019	insu	11/10/19 - 12/10/19   PVI INSURANCE	10.75		146.51	8535905
12/01/2019	insu	11/12/19 - 12/12/19   PVI INSURANCE	10.75		157.26	8535907
12/01/2019	rent	Rent (12/2019)	2,034.00		2,191.26	8647062
12/01/2019	prkg	Parking (12/2019)	175.00		2,366.26	8647361
12/10/2019		chk# :ACH-WEB Online Payment - EFT Payment. Mobile Web - Resident Services		2,366.26	0.00	3272563
01/01/2020	utsf	Other Reimbursed Costs - 01/01/20-01/31/20	7.60		7.60	8748906
01/01/2020	rele	Reimbursed Electric - 10/29/19-12/02/19	44.96		52.56	8748908
01/01/2020	rgas	Reimbursed Gas - 11/01/19-12/01/19	9.33		61.89	8748910
01/01/2020	rpes	Reimbursed Pest Control - 11/01/19-12/01/19	3.00		64.89	8748912
01/01/2020	rsew	Reimbursed Sewer - 11/01/19-12/01/19	16.21		81.10	8748914
01/01/2020	rtra	Reimbursed Trash - 11/01/19-12/01/19	7.03		88.13	8748916
01/01/2020	rwat	Reimbursed Water - 11/01/19-12/01/19	21.76		109.89	8748918
01/01/2020	insu	12/12/19 - 01/12/20   PVI INSURANCE	10.75		120.64	8916351
01/01/2020	rent	Rent (01/2020)	2,034.00		2,154.64	9027349
01/01/2020	prkg	Parking (01/2020)	175.00		2,329.64	9027644
01/03/2020		chk# :ACH-WEB Online Payment - EFT Payment. Mobile Web - Resident Services		2,329.64	0.00	3370493
02/01/2020	utsf	Other Reimbursed Costs - 02/01/20-02/29/20	7.60		7.60	9142521
02/01/2020	rele	Reimbursed Electric - 12/02/19-01/02/20	56.35		63.95	9142525
02/01/2020	rgas	Reimbursed Gas - 12/01/19-01/01/20	11.45		75.40	9142528
02/01/2020	rpes	Reimbursed Pest Control - 12/01/19-01/01/20	3.00		78.40	9142531
02/01/2020	rsew	Reimbursed Sewer - 12/01/19-01/01/20	17.19		95.59	9142534
02/01/2020	rtra	Reimbursed Trash - 12/01/19-01/01/20	6.43		102.02	9142537
02/01/2020	rwat	Reimbursed Water - 12/01/19-01/01/20	23.09		125.11	9142538
02/01/2020	rent	Rent (02/2020)	2,034.00		2,159.11	9416336



22NWLC13380

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert Scott Kennard, SBN 117017 Jeremy Wachtman, SBN 259992 NELSON & KENNARD File No. 22-08346-0 5011 Dudley Blvd, Bldg 250, Bay G, McClellan, CA 95652 P.O. Box 13807, Sacramento, CA 95853 TELEPHONE NO.: (916) 920-2295 FAX NO. (Optional): (916) 920-0682 ATTORNEY FOR (Name): BANK OF AMERICA, N.A.	<b>FOR COURT USE ONLY</b>			
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 12720 NORWALK BLVD. MAILING ADDRESS: 12720 NORWALK BLVD. CITY AND ZIP CODE: NORWALK, CA 90650 BRANCH NAME: SOUTHEAST DISTRICT-NORWALK COURTHOUSE-LIMITED CIVIL				
CASE NAME: BANK OF AMERICA, N.A., v. NICHOLAS BRITT WHITE, Et al.				
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%; padding: 5px;"> <b>CIVIL CASE COVER SHEET</b>  <input type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000)     <input checked="" type="checkbox"/> Limited (Amount demanded is \$25,000 or less)                 </td> <td style="width:33%; padding: 5px;"> <b>Complex Case Designation</b>  <input type="checkbox"/> Counter     <input type="checkbox"/> Joinder                  Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)             </td> <td style="width:33%; padding: 5px;">                 CASE NUMBER:  <b>22NWLC13380</b>                  JUDGE:                  DEPT:             </td> </tr> </table>	<b>CIVIL CASE COVER SHEET</b> <input type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input checked="" type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <b>22NWLC13380</b> JUDGE: DEPT:	
<b>CIVIL CASE COVER SHEET</b> <input type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input checked="" type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: <b>22NWLC13380</b> JUDGE: DEPT:		

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input checked="" type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400 – 3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
--	---	--

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |   |
|--|---|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses   |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial post-disposition judicial supervision   |
3. Remedies sought (check all that apply): a.  monetary    b.  nonmonetary; declaratory or injunctive relief    c.  punitive
4. Number of causes of action (specify): ONE
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 3, 2022

Jeremy Wachtman  
 (TYPE OR PRINT NAME)



*Jeremy Wachtman*  
 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2





P.O. BOX 15284  
WILMINGTON, DE 19850

NICHOLAS BRITT WHITE  
1200 S GRAND AVE APT 550  
LOS ANGELES CA 90015-3953

**Customer Service Information:**

www.bankofamerica.com  
1.800.421.2110

**Mail billing inquiries to:**

Bank of America  
P.O. Box 982234  
El Paso TX 79998-2234

**Mail payment to:**

Bank of America  
P.O. Box 15019  
Wilmington DE 19886-5019

February 12 - March 11, 2021  
Account# [REDACTED] 1027

**Account Summary**

Previous Balance	\$2,554.67
Payments and Other Credits	\$0.00
Purchases and Adjustments	\$0.00
<b>Fees Charged</b>	<b>\$0.00</b>
<b>Interest Charged</b>	<b>\$37.48</b>
<hr/>	
New Balance Total	\$2,592.15
Total Credit Line	\$2,000.00
Total Credit Available	\$0.00
Cash Credit Line	\$200.00
Portion of Credit Available for Cash	\$0.00
Statement Closing Date	03/11/2021
Days in Billing Cycle	28

**Payment Information**

New Balance Total	\$2,592.15
Current Payment Due	\$63.00
Past Due Amount	\$633.00
<hr/>	

Total Minimum Payment Due	\$696.00
Payment Due Date	04/08/2021

**Late Payment Warning:** If we do not receive your Total Minimum Payment by the date listed above, you may have to pay a late fee of up to **\$39.00** and your APRs may be increased up to the Penalty APR of **29.99%**.  
**Total Minimum Payment Warning:** If you make only the Total Minimum Payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay	You will payoff the balance shown on this statement in about	And you will end up paying an estimated total of
Only the Total Minimum Payment	11 years	\$4,680.00

If you would like information about credit counseling services, call 866.300.5238.

[REDACTED] 1027

BANK OF AMERICA  
P.O. BOX 15019  
WILMINGTON DE 19886-5019

Account Number: [REDACTED] 1027

New Balance Total	\$2,592.15
Total Minimum Payment Due	\$696.00
Payment Due Date	04/08/2021

Enter payment amount \$

NICHOLAS BRITT WHITE  
1200 S GRAND AVE APT 550  
LOS ANGELES CA 90015-3953

*For change of address/phone number, see reverse side.  
Make your payment online at [www.bankofamerica.com](http://www.bankofamerica.com) or  
Mail this coupon along with your check payable to: Bank of America*

[REDACTED] 1027

ROBERT SCOTT KENNARD	Licensed in CA, WA, and DE
JAMIE FORBES	Licensed in CA and OR
JOHN GORDON	Licensed in CA
MARVIN DANG	Licensed in HI
JASON OLIVER	Licensed in HI
CHRISTOPHER E. MUMMA	Licensed in NV and CA
GLORIA ZARCO	Licensed in CA
RENEE FURUTA-BARNUM	Licensed in HI
NICHELLE P. HANNA	Licensed in CO
BENJAMIN METTIAS	Licensed in CA
JANSHER RASA	Licensed in CA
CHRISTOPHER N. DANNA	Licensed in CA
AMBER FERRY	Licensed in CA
JEREMY WACHTMAN	Licensed in CA

### NELSON & KENNARD

Attorneys at Law

P.O. Box 13807

Sacramento, CA 95853

(916) 920-2295

Toll Free: (866) 920-2295

Facsimile: (916) 920-0682

www.nelson-kennard.com

info@nelson-kennard.com

Office Hours: Mon – Fri 8am – 6pm (PST)

TTY Dial 711 - Connect to (916) 920-2295

**CALIFORNIA OFFICE**  
5011 Dudley Blvd, Bldg. 250, Bay G  
McClellan, CA 95652

**COLORADO OFFICE**  
12596 W Bayaud Ave, Ste. 120  
Lakewood, CO 80224

**NEW MEXICO OFFICE**  
500 Marquette Ave NW Ste. 1200  
Albuquerque, NM, 87102

**HAWAII OFFICE**  
P.O. Box 4109  
Honolulu, Hawaii 96812-4109

**NEVADA OFFICE**  
4600 Kietzke Lane, Bldg. I, #204-205  
Reno, NV 89502

Washington OSA License 602 596 113  
California DFPI License Pending

June 6, 2022

NICHOLAS BRITT WHITE  
1200 S GRAND AVE APT 550  
LOS ANGELES, CA 90015-3953

Nelson & Kennard File No.:	22-08346-0
Creditor:	Bank of America, N.A.
Account No.	XXXXXXXXXXXX1027
Current Balance:	\$2,592.15

Dear NICHOLAS BRITT WHITE:

This office represents Bank of America, N.A. with respect to the above-referenced matter. Our client has authorized our firm to file suit to effect collection of the balance claimed to be due. Notwithstanding, our client would appreciate the opportunity to explore an amicable resolution of the matter without litigation. If you would like to resolve this matter on a voluntary basis, please contact our office at your earliest convenience.

If legal action is commenced, judgment may be entered against you for the balance owed, together with court costs where allowed by law.

If you have any questions or wish to discuss this matter, please contact an account representative at (866) 920-2295 ext. 604.

This firm is a debt collector attempting to collect a debt. Any information obtained will be used for that purpose. All calls are recorded and may be monitored for quality assurance.

Very truly yours,  
NELSON & KENNARD



Robert Scott Kennard  
Attorney at Law

This account is issued and administered by Bank of America, N.A., successor in interest to FIA Card Services, N.A.



Electronically FILED by Superior Court of California, County of Los Angeles on 06/14/2022 01:46 P.M. Sherri R. Carter, Executive Officer/Clerk of Court, by H. Chavez, Deputy Clerk

22NWLC13261

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert Scott Kennard, SBN 117017 Jeremy Wachtman, SBN 259992 NELSON & KENNARD File No. 22-08347-0 5011 Dudley Blvd, Bldg 250, Bay G, McClellan, CA 95652 P.O. Box 13807, Sacramento, CA 95853 TELEPHONE NO.: (916) 920-2295 FAX NO. (Optional): (916) 920-0682 ATTORNEY FOR (Name): BANK OF AMERICA, N.A.	<b>FOR COURT USE ONLY</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 12720 NORWALK BLVD. MAILING ADDRESS: 12720 NORWALK BLVD. CITY AND ZIP CODE: NORWALK, CA 90650 BRANCH NAME: SOUTHEAST DISTRICT-NORWALK COURTHOUSE-LIMITED CIVIL	
CASE NAME: BANK OF AMERICA, N.A., v. NICHOLAS BRITT WHITE, Et al.	
<b>CIVIL CASE COVER SHEET</b> <input type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input checked="" type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
	CASE NUMBER: <b>22NWLC13261</b> JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input checked="" type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400 – 3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
--	---	--

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- |  |   |
|--|---|
| a. <input type="checkbox"/> Large number of separately represented parties<br>b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve<br>c. <input type="checkbox"/> Substantial amount of documentary evidence | d. <input type="checkbox"/> Large number of witnesses<br>e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states or countries, or in a federal court<br>f. <input type="checkbox"/> Substantial post-disposition judicial supervision |
|--|---|

3. Remedies sought (check all that apply): a.  monetary     b.  nonmonetary; declaratory or injunctive relief     c.  punitive

4. Number of causes of action (specify): ONE

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 3, 2022

Jeremy Wachtman  
(TYPE OR PRINT NAME)



*Jeremy Wachtman*  
(SIGNATURE OF PLAINTIFF OR ATTORNEY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

**BANK OF AMERICA**

P.O. BOX 15284  
WILMINGTON, DE 19850

NICHOLAS BRITT WHITE  
1200 S GRAND AVE APT 550  
LOS ANGELES CA 90015-3953

**Customer Service Information:**

www.bankofamerica.com  
1.800.421.2110  
TTY: 1.800.346.3178

**Mail billing inquiries to:**

Bank of America  
P.O. Box 982234  
El Paso TX 79998-2234

**Mail payment to:**

Bank of America  
P.O. Box 15019  
Wilmington DE 19886-5019

September 6 - October 5, 2020  
Account# [REDACTED] **6781**

**Account Summary**

Previous Balance	\$3,923.21
Payments and Other Credits	\$0.00
Purchases and Adjustments	\$0.00
<b>Fees Charged</b>	<b>\$0.00</b>
<b>Interest Charged</b>	<b>\$65.79</b>
<hr/>	
New Balance Total	\$3,989.00
Total Credit Line	\$3,100.00
Total Credit Available	\$0.00
Cash Credit Line	\$410.00
Portion of Credit Available for Cash	\$0.00
Statement Closing Date	10/05/2020
Days in Billing Cycle	30

**Payment Information**

New Balance Total	\$3,989.00
Current Payment Due	\$105.00
Past Due Amount	\$895.00

Total Minimum Payment Due	\$1,000.00
Payment Due Date	11/02/2020

**Late Payment Warning:** If we do not receive your Total Minimum Payment by the date listed above, you may have to pay a late fee of up to **\$39.00** and your APRs may be increased up to the Penalty APR of **29.99%**.

**Total Minimum Payment Warning:** If you make only the Total Minimum Payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay	You will payoff the balance shown on this statement in about	And you will end up paying an estimated total of
Only the Total Minimum Payment	15 years	\$8,151.00

**If you would like information about credit counseling services, call 866.300.5238.**

[REDACTED] **6781**  
  
BANK OF AMERICA  
P.O. BOX 15019  
WILMINGTON DE 19886-5019

Account Number: [REDACTED] **6781**

New Balance Total	\$3,989.00
Total Minimum Payment Due	\$1,000.00
Payment Due Date	11/02/2020

Enter payment amount \$

NICHOLAS BRITT WHITE  
1200 S GRAND AVE APT 550  
LOS ANGELES CA 90015-3953

*For change of address/phone number, see reverse side.  
Make your payment online at www.bankofamerica.com or*

**Mail this coupon along with your check payable to: Bank of America**

[REDACTED] **6781**



<b>ROBERT SCOTT KENNARD</b>	Licensed in CA, WA, and DC
<b>JAMIE FORBES</b>	Licensed in CA and OP
<b>JOHN GORDON</b>	Licensed in CA
<b>MARVIN BANG</b>	Licensed in HI
<b>JASON OLIVER</b>	Licensed in HI
<b>CHRISTOPHER E. MUMM</b>	Licensed in WA and CA
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<b>MICHELLE P. HANNA</b>	Licensed in CO
<b>BENJAMIN METTAS</b>	Licensed in CA
<b>JANISHER RASA</b>	Licensed in CA
<b>CHRISTOPHER N. DANNA</b>	Licensed in CA
<b>AMBER TERRY</b>	Licensed in CA
<b>JEREMY WACHTMAN</b>	Licensed in CA

Washington OSA License 602 596 113  
California DFPI License Pending

## NELSON & KENNARD

Attorneys at Law

P.O. Box 13807

Sacramento, CA 95853

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McClellan, CA 95652

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12596 W Miyuki Ave, Ste. 170  
Lakewood, CO 80228

**NEW MEXICO OFFICE**  
500 Marquette Ave NW Ste. 1200  
Albuquerque, NM, 87102

**HAWAII OFFICE**  
P.O. Box 4109  
Honolulu, Hawaii 96812-4109

**NEVADA OFFICE**  
4600 Kietzke Lane, Bldg. I, #204-205  
Reno, NV 89502

June 6, 2022

NICHOLAS BRITT WHITE  
1200 S GRAND AVE APT 550  
LOS ANGELES, CA 90015-3953

Nelson & Kennard File No.:	22-08347-0
Creditor:	Bank of America, N.A.
Account No.	XXXXXXXXXX6781
Current Balance:	\$3,989.00

Dear NICHOLAS BRITT WHITE:


This office represents Bank of America, N.A. with respect to the above-referenced matter. Our client has authorized our firm to file suit to effect collection of the balance claimed to be due. Notwithstanding, our client would appreciate the opportunity to explore an amicable resolution of the matter without litigation. If you would like to resolve this matter on a voluntary basis, please contact our office at your earliest convenience.

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This firm is a debt collector attempting to collect a debt. Any information obtained will be used for that purpose. All calls are recorded and may be monitored for quality assurance.

Very truly yours,  
NELSON & KENNARD



Robert Scott Kennard  
Attorney at Law

This account is issued and administered by Bank of America, N.A., successor in interest to FIA Card Services, N.A.

EJ-100

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, address, state bar number)  
 Recording requested by and return to:  
 Amber Terry, SBN 804764  
 NELSON & KENNARD File No. 22-08347-0  
 5011 Dudley Blvd, Bldg 250, Bay G  
 McClellan, CA 95652  
 TELNO: (916) 920-2295 FAX NO. (optional): (916) 920-0682

ATTORNEY  JUDGMENT  ASSIGNEE OF  
 FOR CREDITOR RECORD

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**  
 STREET ADDRESS: SUPERIOR COURT OF CALIFORNIA  
 MAILING ADDRESS: 12720 NORWALK BLVD.  
 CITY AND ZIP CODE: NORWALK, CA 90650  
 BRANCH NAME: SOUTHEAST DISTRICT-NORWALK  
 COURTHOUSE-LIMITED CIVIL

FOR RECORDER'S USE ONLY

PLAINTIFF: Bank of America, N.A.  
 DEFENDANT: NICHOLAS BRITT WHITE, et al.

CASE NUMBER:  
 22NWLC13261

**ABSTRACT OF JUDGEMENT - CIVIL AND SMALL CLAIMS**  Amended

FOR COURT USE ONLY

1. The  judgment creditor  assignee of record applies for an abstract of judgment and represents the following:  
 a. Judgment debtor's Name and last known address  
 NICHOLAS BRITT WHITE  
 1200 S Grand Ave Apt 550  
 Los Angeles, California 90015-3953  
 b. Driver's license no. [last 4 digits] and state:  Unknown  
 c. Social security no [last 4 digits]: \*\*\*-\*\*-9057  Unknown  
 d. Summons or notice of entry of sister-state judgment was personally served or mailed to d.  
 Summons or notice of entry of sister-state judgment was personally served or mailed to (name and address):  
 NICHOLAS BRITT WHITE, 1200 S Grand Ave Apt 550, Los Angeles, California 90015-3953

2.  Information on additional judgment debtors is shown on page 2.  
 3. Judgment creditor (name and address):  
 Bank of America, N.A.

4.  Information on additional judgment creditors is shown on page 2.  
 5.  Original abstract recorded in this county:  
 a. Date:  
 b. Instrument No.:

c/o NELSON & KENNARD P.O. Box 13807, Sacramento, CA 95853  
 Date: December 16, 2022  
 Amber Terry

(TYPE OR PRINT NAME)

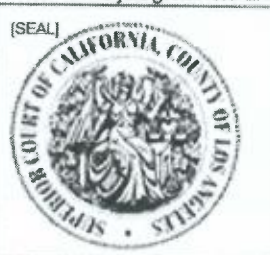
(SIGNATURE OF APPLICANT OR ATTORNEY)

6. Total amount of judgment as entered or last renewed:  
 \$ 4,303.27  
 7. All judgment creditors and debtors are listed on this abstract.  
 8. a. Judgment entered on (date): August 3, 2022  
 b. Renewal entered on (date):

10.  An  execution lien  attachment lien is endorsed on the judgment as follows:  
 a. Amount: \$  
 b. In favor of (name and address):

9.  This judgment is an installment judgment.

11. A stay of enforcement has  
 a.  not been ordered by the court.  
 b.  been ordered by the court effective until (date):



Sherri R. Carter Executive Officer / Clerk of Court

This Abstract issued on (date):  
 12/28/2022

12. a.  I certify that this is a true and correct abstract of the judgment entered in this action.  
 b.  A certified copy of the judgment is attached.  
 Clerk, by C. Nash, Deputy

**ABSTRACT OF JUDGEMENT - CIVIL AND SMALL CLAIMS**



**EXHIBIT 8**

22VECV01173

Electronically FILED by Superior Court of California, County of Los Angeles, Case No. 22VECV01173, Filed 03/23/23, 10:00 AM, by A. Salcedo, Deputy Clerk

1 Arden D. Burstein, SBN 175309  
 2 VANLOCHEM & ASSOCIATES LLP  
 3 6565 Sunset Blvd., Suite 412  
 Hollywood, CA 90028  
 4 Phone: (323) 993-0500  
 Fax: (323) 993-0501  
 5 Email: aburstein@vandc.net  
 Attorneys for Plaintiff, ALLY BANK LEASE TRUST,  
 an association

6  
 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 8 COUNTY OF LOS ANGELES  
 9 (VAN NUYS DISTRICT)

10 ALLY BANK LEASE TRUST, an  
 11 association

12 Plaintiff,

13 vs.

14 ERIKA WHITE, an individual; DOES 1  
 through 10, inclusive,

15 Defendants.

CASE NO.

COMPLAINT FOR CLAIM AND DELIVERY  
 OF PERSONAL PROPERTY, FOR PRE-  
 TRIAL WRIT OF POSSESSION, AND  
 ORDER DIRECTING TRANSFER OF  
 PERSONAL PROPERTY AND  
 RESTRAINING ORDER

16  
 17  
 18  
 19 For a cause of action against defendants, and each of them, plaintiff ALLY  
 20 BANK LEASE TRUST, an association (hereinafter referred to as "Plaintiff"),  
 21 complains and alleges as follows:

22 **CLAIM AND DELIVERY OF PERSONAL PROPERTY**  
 23 **(Against All Defendants)**

24 1. At all times herein mentioned, Plaintiff was and now is an  
 25 association, and was and now is duly qualified to do business in the State of  
 26 California.

27 2. Defendant DOES 1 through 10, inclusive, are sued herein under such  
 28 fictitious names for the reason that their true names and capacities are unknown





ZARFAMAN4K7606474

2019 ALFA

8LMA520

STATE OF CALIFORNIA									
CERTIFICATE OF TITLE						VEHICLE HISTORY			
X2119081924									
AUTOMOBILE									
VEHICLE ID NUMBER		YR MODEL		MAKE		PLATE NUMBER			
ZARFAMAN4K7606474		2019		ALFA		8LMA520			
BODY TYPE MODEL		UNLOADED WEIGHT		FUEL		TRANSFER DATE		FEES PAID	
4D				G				NONE	
YR 1ST SOLD		CLASS		YR		MO		EQUIPM/TRUST NUMBER	
2019		LD				AH			
MOTORCYCLE ENGINE NUMBER						ODOMETER DATE		ODOMETER READING	
						07/02/2019		26 MI	
						ACTUAL MILEAGE			
REGISTERED OWNER(S)									
VAULT FOR ALLY OR COLT LSR									
WHITE ERIKA LSE									
210 CATHEDRAL COVE APT 16									
CAMARILLO CA 93012									
I certify (or declare) under penalty of perjury under the laws of the State of California that THE SIGNATURE(S) BELOW RELEASES INTEREST IN THE VEHICLE.									
1a		DATE		SIGNATURE OF REGISTERED OWNER					
1b		DATE		SIGNATURE OF REGISTERED OWNER					
Federal and State law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.									
The odometer now reads [ ] [ ] [ ] [ ] (no tenths), miles and to the best of my knowledge reflects the actual mileage unless one of the following statements is checked. Mileage is VOID if altered or erased.									
WARNING <input type="checkbox"/> Odometer reading is not the actual mileage <input type="checkbox"/> Mileage exceeds the odometer mechanical limits									
I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.									
DATE		TRANSFEROR'S SIGNATURE				DATE		TRANSFEREE'S SIGNATURE	
PRINTED NAME OF SELLER OR AGENT SIGNING FOR SELLER					PRINTED NAME OF BUYER OR AGENT SIGNING FOR BUYER				
<b>IMPORTANT READ CAREFULLY</b>									
Any change of Lienholder (holder of security interest) must be reported to the Department of Motor Vehicles within 10 days.									
LIENHOLDER(S)									
ALLY FNCL					2. X				
PO BX 8128					Signature releases interest in vehicle (Company names must be countersigned)				
COCKEYSVILLE					Release Date				
MD 21030									
					011774 CA191216353				
					REG. 17.30RS (REV 02/2016)				
KEEP IN A SAFE PLACE - VOID IF ALTERED									

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

Exhibit B



**J.D. POWER**

8/8/2022

J.D. POWER Used Cars/Trucks

**Vehicle Information**

Vehicle: 2019 Alfa Romeo Giulia Sedan 4D Sport 2.0L I4 Turbo  
 Region: California  
 Period: August 8, 2022  
 VIN: ZARFAMAN4K7606474  
 Mileage: 52,500




**J.D. POWER Used Cars/Trucks Values**

	Base	Mileage Adj.	Option Adj.	Adjusted Value
Monthly				
Trade-In				
Average	\$26,975	N/A	N/A	\$26,975
Clean Retail	\$32,225	N/A	N/A	\$32,225

**EXHIBIT 9**



**SHIP FROM**  
 Name: Kraft Heinz Food Company c/o F  
 Address: 1301 Heinz Drive  
 City/State/Zip: Fremont, OH 43420  
 S. D. #  FCB

Bill of Lading Number: 2059442750  


**SHIP TO**  
 Name: BAUGH 500TH COUPE BAYVIEW PEDIAN  
 Address: 12421 NW 17TH ST  
 City/State/Zip: ALACHUA FL 32615  
 CID#  FCB

CARRIER NAME: COYOTE  
 Trailer number: 514361 CLLO COYOTE  
 Seal number(s): 532017  
 SCAC: CLLO  
 Pro number: D101

**THIRD PARTY FREIGHT CHARGES BILL TO**  
 Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City/State/Zip: \_\_\_\_\_  
 SUBJECT TO COUNT & INSPECTION  
 Date: 11/3/20  
 Driver: \_\_\_\_\_  
 DOC: [Signature]

**CARRIER INSTRUCTIONS**  
 COLD WEATHER NOTICE: 1015 to 1045 shipment is susceptible to freezing if exposed to freezing temperatures for prolonged periods. It may be considered an anticipated, general shipment for instructions.

**SPECIAL INSTRUCTIONS**  
 CHEP OUT: 3-PECO OUT: 22-GMA OUT:  
 0-KPH7 OUT: 0-F7L WGT: 0

**Freight Charge Terms** (freight charges are prepaid unless marked otherwise)  
 Prepaid  Collect  3rd Party   
 Master Bill of Lading with attached underlying (check box #100)

CUSTOMER ORDER NUMBER	# PKGS	WEIGHT	PALETS (SHIP CONTROL ONE)	ADDITIONAL SHIPPER INFO
<u>00334870</u>	1848	40977	Y	1770474011
<b>GRAND TOTAL</b>	1848	40977		

HANDLING UNIT		PACKAGE		WEIGHT	H M (X)	COMMODITY DESCRIPTION	LTL ONLY	
QTY	TYPE	QTY	TYPE				NMFC	CLASS
22	PLT	1848	CSFS	40977		Class-00 Feed Stuffs		
22		1848		40977		<b>GRAND TOTAL</b>		

NOTE: Liability limited for loss or damage in this shipment may be applicable. Sec 49 U.S.C. 14706(c)(1)(YA) and (B)  
 COD Amount: \$ \_\_\_\_\_  
 Fee Terms: Collect  Prepaid   
 Customer check acceptable

**SHIPPER SIGNATURE / DATE**  
[Signature]  
 Date: 10-31-2020

**CARRIER SIGNATURE / PICKUP DATE**  
[Signature]  
 Date: \_\_\_\_\_

**WILEY SANDERS TRUCK LINES, INC.**  
 POST OFFICE DRAWER 707  
 18011 ALABAMA 20681  
 (334) 594-5181



HEFFRI  
 HEINZ FOOD  
 1331 HEINZ DR.  
 FREMONT, OH 43420

CLALL4  
 COYOTE LOGISTICS  
 963 NORTH PI PKWY  
 SUITE 150  
 ALPHARETTA, GA 30009

SHIP DATE: 10/31/20  
 INVOICE DATE: 11/05/20  
 INVOICE NUMBER: 2540237

SRSAL  
 SYSGO - HAUGH SOUTH COOPER  
 12421 NW 173RD STREET  
 ALACHUA, FL 32615

WILEY SANDERS TRUCK LINES  
 P.O. BOX 707  
 TROY, AL 36081

**BILL OF LADING NUMBER**

MILES

TRACTOR NO

TRAILER NO

212006990

953

763

534361

ORDER # 2372701

WILLI WILLIAMS ISAAC

**DESCRIPTION OF ARTICLES**

WEIGHT

RATE

CHARGES

FREIGHT ALL KINDS  
 FLAT RATE  
 FUEL SURCHARGE

45500

953

1900

2,368.93  
 181.07

WILEY SANDERS TRUCK LINES, INC. IS AN EQUAL OPPORTUNITY EMPLOYER.  
 MINORITY AND DISABLED INDIVIDUALS ARE ENCOURAGED TO APPLY.

PAY THIS AMOUNT **2,550.00**



1 KATHRYN B. MILSTEAD, ESQ., BAR NO. 119553  
2 MARY G. LEE, ESQ., BAR NO. 170648  
3 IVANJACK & LAMBIRTH  
4 A Partnership Including  
5 Professional Corporations  
6 12301 Wilshire Boulevard, Suite 600  
7 Los Angeles, California 90025-1000  
8 Telephone No.: (310) 820-7211  
9  
10 Attorneys for Plaintiff  
11 BANK OF AMERICA N.T. & S.A.

**FILED**  
LOS ANGELES SUPERIOR COURT

JUL 29 1997  
JOHN A. CLARKE, CLERK  
*[Signature]*  
BY S. L. MCGOWAN, DEPUTY

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

BC175378

11 BANK OF AMERICA N.T. & S.A., a ) CASE NO.  
12 national bank, successor by merger )  
13 to Security Pacific National Bank, )  
14 Plaintiff )  
15 v. )  
16 LEON LANDVER and YANA LANDVER )  
17 individually, and as Trustees of )  
18 the Landver Family Trust; MICHAEL )  
19 LANDVER, an individual; VERA )  
20 LANDVER, an individual; and DOES 1 )  
21 through 100, inclusive, )  
22 Defendants. )

COMPLAINT FOR:  
(1) SPECIFIC PERFORMANCE OF PROVISIONS OF DEED OF TRUST AUTHORIZING BENEFICIARIES TO TAKE POSSESSION AFTER DEFAULT AND APPOINTMENT OF RECEIVER TO COLLECT RENTS, ISSUES AND PROFITS;  
(2) JUDICIAL FORECLOSURE; AND  
(3) INJUNCTIVE RELIEF

21 FIRST CAUSE OF ACTION FOR SPECIFIC  
22 PERFORMANCE OF DEED OF TRUST AND ASSIGNMENT  
23 OF RENTS AND FOR APPOINTMENT OF RECEIVER

(Against All Defendants)

25 1. Plaintiff, Bank of America, N.A., S.A.  
26 (hereinafter "Plaintiff"), at all times herein, is, and now is, a  
27 national bank organized and existing under the laws of the United  
28 States of America. Plaintiff is the successor merger to

RECEIVED  
FILED  
JUL 29 1997  
CLERK  
S. L. MCGOWAN

Order Number 8848380

89 481008

2391543

RECORDING REQUESTED BY  
RECORDED AT THE REQUEST OF CONTINENTAL LAND TITLE CO.

WHEN RECORDED, PLEASE MAIL TO

SECURITY PACIFIC NATIONAL BANK  
P.O. BOX 6012  
CYPRESS, CA. 90630-6012  
Attention: NEW LOAN BOOKING UNIT B4-63

RECORDED IN OFFICIAL RECORDS  
OF LOS ANGELES COUNTY, CA  
MAR 29 1989 AT 8 A.M.  
Recorder's Office

SPACE ABOVE THIS LINE FOR RECORDER'S USE

# Deed of Trust

With Assignment of Rents

FEE \$13 C  
5

THIS DEED OF TRUST, made this 22ND day of MARCH, 1989,  
between LEON LANDVER AND YANA LANDVER, HUSBAND AND WIFE, AND MICHAEL LANDVER AND  
VERA LANDVER, HUSBAND AND WIFE, as TRUSTOR,  
whose address is 1151 W. 6TH STREET, LOS ANGELES, CALIFORNIA 90017  
(Number and Street) (City) (State)

Equitable Deed Company, a California corporation, as TRUSTEE, and  
SECURITY PACIFIC NATIONAL BANK, a National Banking Association, as BENEFICIARY,

WITNESSETH: That Trustor irrevocably GRANTS, TRANSFERS and ASSIGNS to TRUSTEE IN TRUST,  
WITH POWER OF SALE, the property in LOS ANGELES County, California, described as:

AS PER EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF.

including all appurtenances, all easements used in connection therewith, all water and water rights (whether riparian, appropriative, or otherwise, and whether or not appurtenant) used in connection therewith, all shares of stock evidencing the same, pumping stations, engines, machinery, and pipes, TOGETHER WITH the rents, issues and profits thereof, SUBJECT, HOWEVER, to the assignment, as hereinafter set out, to Beneficiary of the rents, issues and profits; and also including as part of said property all fixtures and equipment now or hereafter thereto attached or thereon situated and intended or designed for use in connection therewith.

FOR THE PURPOSE OF SECURING (1) Payment of the sum of \$507,000.00 with interest thereon according to the terms of a promissory note or notes of even date herewith,

made by Trustor, payable to order of Beneficiary, and extensions or renewals thereof; (2) Performance of each agreement of Trustor herein contained; (3) Payment of any and all obligations now or hereafter owing from any Trustor hereunder to Beneficiary and secured by

022210 6-86 PS

8848380-83

EXHIBIT

2

89 481008

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5152-1-43



**EXHIBIT 10**



Via E-Mail: [ceo@thehollywoodlanddevelopmentcompany.com](mailto:ceo@thehollywoodlanddevelopmentcompany.com)

September 19, 2018

Nicholas Phipps  
Chairman and CEO  
The Hollywood Land Development  
Company, LLC  
(415) 539-6760

*Re: Sovereign Tower | Stakeholders*

Dear Mr. Phipps:

You have been told several times that I do not represent you. I put a massive amount of time into this but, I am out of the case. Please remove my name out of the distribution list.

With kind regards,

THOMAS V. GIRARDI  
TVG:kc



GIRARDI | K E E S E  
LAWYERS

Via E-Mail: [ceo@thehollywoodlanddevelopmentcompany.com](mailto:ceo@thehollywoodlanddevelopmentcompany.com);  
[Sovereigntower1@thesovereigtowers.com](mailto:Sovereigntower1@thesovereigtowers.com);  
[themanagingdirector@thesovereigtowers.com](mailto:themanagingdirector@thesovereigtowers.com)

June 30, 2020

Nicholas Phipps White  
Mary Phipps White  
The Hollywood Land Development Company  
The Offices of the Sovereign Tower I  
Stakeholders  
324 South Beverly Drive, Suite 489  
Beverly Hills, CA 90212

**Re: Withdrawal**

Dear Mr. & Mrs. Phipps White:

I have made a decision that I no longer want to be involved in any way with the claim by Nicholas Phipps White, Mary Phipps White and the Hollywood Land Development Company. I will not discuss the reasons for my withdrawal. This also withdraws any claim for legal services previously discussed.

With kind regards,

  
THOMAS V. GIRARDI

TVG:sf

GIRARDI | KEESE  
LAWYERS

March 3, 2020

Via Email: [ceo@thehollywoodlanddevelopmentcompany.com](mailto:ceo@thehollywoodlanddevelopmentcompany.com);  
[sovereigntower1@thesovereigntowers.com](mailto:sovereigntower1@thesovereigntowers.com);

Nicholas Phipps White  
The Hollywood Land Development Co.  
324 South Beverly Drive, Suite 489  
Beverly Hills, CA 90212

My dear pal:

I truly believe I can move some mountains if I had a copy of the President's note. If you are worried about who I show it to, I will get permission from you to each person. I do not have a relationship with the Attorney General, but I do have a relationship with several in his staff who are very high up. I also do not believe the trustees have been informed of the President's request. I will continue to do everything I can to get the family paid.

Mary raised one other issue concerning the fire funds. I have no responsibility for leadership in that case, but I spoke to the leaders. Nobody was of the view to take Hollywood's money and give it to other victims. It would be totally absurd to want to take someone else's money. Everyone said that. Please give my request a little thought. I truly am here to help.

With kind regards,

  
TOM

/sf

1126 WILSHIRE BOULEVARD • LOS ANGELES, CALIFORNIA • 90017-1904  
TELEPHONE: 213-977-0211 • FACSIMILE: 213-481-1554  
WWW.GIRARDIKEESE.COM



# Who they were: Victims of the deadliest California wildfire

June 16, 2020



SAN FRANCISCO (AP) — Pacific Gas & Electric pleaded guilty Tuesday to killing 84 of the 85 victims of a 2018 wildfire in Northern California. A report released by the Butte County district attorney listed the names of all but two who have not been identified and how they died.

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Joyce Acheson, 78, of Paradise, was found inside her home. She had limited mobility and lived in an area closed off to public access, preventing any caregiver from getting to her.

Herbert Alderman, 80 of Paradise, had a severely sprained ankle that limited his mobility at the time of the fire. He made several phone calls to friends seeking rescue but was found inside his home.

Teresa Ammons, 82, of Paradise, died attempting to flee the fire. She was found outside her trailer with her purse nearby.

Rafaela Andrade, 84, of Paradise, needed a walker to get around and did not have the ability to evacuate on her own. She was found inside her home.

Carol Arrington, 88, of Paradise, was found inside her home.

Julian Binstock, 88, of Paradise, was found with the remains of his dog in the shower of his home.

David Bradburd, 70, of Paradise, was near a power line knocked down by the fire outside his home.

Cheryl Brown, 75, of Paradise, was found in a recliner next to her husband, Larry Brown.

Larry Brown, 72, of Paradise, was found in a recliner next to his wife, Cheryl Brown.

Richard Brown, 74 of Concow, was found outside his home under his pickup truck, where he tried to hide from the fire.

Andrew Burt, 36 of Paradise, was found just outside the front passenger side door of a minivan with his dog. He was trying to escape in the minivan when it was overcome by flames. Three other vehicles with the remains of four other victims were nearby.

Joanne Caddy, 75, of Magalia, was found inside her home.

Barbara Carlson, 71, of Paradise, was found inside her home. Her remains were commingled with those of her sister, Shirley Haley.

Vincent Carota, 65, of Paradise, a partial leg amputee who did not have a vehicle, was found inside his home.

Dennis Clark, Jr., 49, of Paradise, was found in the passenger seat of a car with his mother Joy Porter in the driver's seat. Their car was in a line of three other vehicles with remains inside.

# Investment Adviser Firm Summary

DEVON INVESTMENT ADVISORY

CRD#: 300425 SEC#:801-114850

DEVON INVESTMENT ADVISORY, LLC

5847 SAN FELIPE STREET, SUITE 4550 HOUSTON, TX 77057 United States

Phone: 713-893-0733

- Web Presence and Social Media

REGISTRATION STATUS

SEC / JURISDICTION	REGISTRATION STATUS	EFFECTIVE DATE
Registered NOTICE FILINGS	APPROVED	2019-03-19

Investment adviser firms registered with the SEC may be required to provide to state securities authorities a copy of their Form ADV and any accompanying amendments filed with the SEC. These filings are called "notice filings". Below are the states with which the firm you selected makes its notice filings. Also listed is the date the firm first became notice filed or registered in each state.

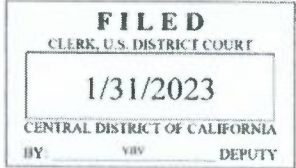
JURISDICTION	EFFECTIVE DATE
CA	2019-04-15
DE	2019-04-15
FL	2019-04-30
GA	2019-04-30
IL	2019-04-16
IN	2019-04-15
LA	2019-04-15
MD	2019-04-15
MI	2019-04-15
MN	2019-04-15
MO	2019-04-30
NV	2019-04-30
NY	2019-04-30
OH	2019-04-30
PA	2019-04-30
TX	2019-03-19

## Investment Advisors Employed

Individual Agent List



**EXHIBIT 11**



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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
March 2022 Grand Jury

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
THOMAS VINCENT GIRARDI and  
CHRISTOPHER KAZUO KAMON,  
Defendants.

CR No. 2:23-cr-00047-JFW

I N D I C T M E N T

[18 U.S.C. § 1343: Wire Fraud; 18  
U.S.C. § 981(a)(1)(C) and 28  
U.S.C. § 2461(c): Criminal  
Forfeiture]

The Grand Jury charges:

COUNTS ONE THROUGH FIVE  
[18 U.S.C. §§ 1343, 2(a)]

A. INTRODUCTORY ALLEGATIONS

1. At times relevant to this Indictment:

a. Defendant THOMAS VINCENT GIRARDI was a resident of  
Pasadena, California.

b. Defendant GIRARDI was an attorney licensed to practice  
law in the State of California.

c. Defendant GIRARDI was the 100 percent owner and  
managing partner of Girardi Keese, a law firm located in Los Angeles,  
California, that primarily represented plaintiffs in personal injury

HOME REALITY TV SHOWS HOT PHOTOS EXCLUSIVE

STATE OF CALIFORNIA  
FRANCHISE TAX BOARD  
Sacramento CA 95812-2952

RECORDER'S OFFICE  
LOS ANGELES COUNTY  
CALIFORNIA

And Where Recorded Map to:

Special Procedures Section  
PO BOX 2952  
Sacramento CA 95812-2952

20220990918

10/17/2022 08:04:00

\$0.00



Notice of State Tax Lien

Filed With: LOS ANGELES

Certificate Number: 22287683127

The Franchise Tax Board of the State of California hereby certifies that the following named taxpayer(s) is liable under parts 10 or 11 of Division 2 of the Revenue and Taxation Code to the State of California for amount due and required to be paid by said taxpayer(s) as follows.

Name of Taxpayer(s) THOMAS V GIRARDI  
ERIK A N GIRARDI

FTB Account Number : 1106622649

Social Security Number(s) : XXX-XX-5134 XXX-XX-5951

Last Known Address : 1126 WILSHIRE BLVD  
LOS ANGELES CA 90017-1904

For Taxable Years : 2019

scribed by law until paid, that the Franchise Tax Board of the State of  
Is 10 or 11 of Division 2 of the Revenue and Taxation Code of the Stat  
d assessing the tax, the said amounts are due and payable and have  
d rights to such property now owned or later acquired by the taxpaye

d of the State of California has duly authorized the undersigned to

FRANCHISE TAX BOARD  
of the State of California

Telephone Number: (916) 845-4350

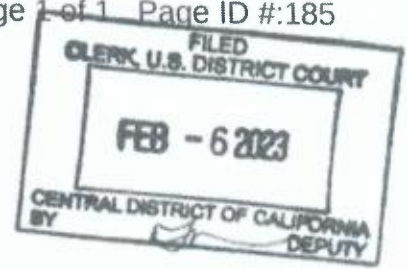
By *[Signature]*

ronaldrichard

x  
X



Craig A. Harbaugh (Bar. No. 194309)  
Deputy Federal Public Defender  
321 East 2nd Street  
Los Angeles, California 90012-4202  
E-Mail: Craig\_Harbaugh@fd.org  
Telephone: (213) 894-4740



UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	CASE NUMBER: 2:23-cr-00047-JLS-1
v. THOMAS VINCENT GIRARDI	DECLARATION RE PASSPORT AND OTHER TRAVEL DOCUMENTS
PLAINTIFF	DEFENDANT.

I, Robert Girardi, declare that  
*(Defendant/Material Witness)*

- I have never been issued any passport or other travel document by any country. I will not apply for a passport or other travel document during the pendency of this case.
- I have been issued a passport or other travel document(s). I will surrender my passport and all other travel document(s) issued to me to the U.S. Pretrial Services Agency by the deadline imposed. I will not apply for a passport or other travel document during the pendency of this case.
- I am unable to locate my passport(s) or other travel document(s). If I locate any passport or other travel document issued to me, I will immediately surrender it to the U.S. Pretrial Services Agency. I will not apply for a passport or other travel document during the pendency of this case.
- My passport and all other travel documents issued to me are in the possession of federal authorities. If any such document is returned to me during the pendency of this case, I will immediately surrender it to the U.S. Pretrial Services Agency. I will not apply for a passport or other travel document during the pendency of this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6 day of FEB, 20 23  
at \_\_\_\_\_  
*(City and State)*

[Signature] *consecrated for*  
Signature of Defendant/Material Witness THOMAS GIRARDI

If the declarant is not an English speaker, include the following:

I, \_\_\_\_\_, am fluent in written and spoken English and \_\_\_\_\_  
languages. I accurately translated this form from English into \_\_\_\_\_  
to declarant \_\_\_\_\_ on this date.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Interpreter*





**PHIPPS**

March 22, 2022

The Honorable Merrick Garland, Attorney General of the United States  
950 Pennsylvania Avenue, NW  
Washington, DC 20530, c/o: Attorney General's Chief-of-Staff, Mr. Matthew B. Klapper

REQUEST FOR WRITTEN CONFIRMATION OF PRINTING OF TREASURY CHECK FOR SOVEREIGN TOWERS SETTLEMENT \$27,829,774.612 FOR PRO SE CLAIMANT NICHOLAS PHIPPS WHITE (TORT ADMINISTRATIVE CLAIMS #164222575, #164222576, #164222577)

Dear Attorney General Garland,

Thank you for your service to the American people. As you are aware, I have contacted the U.S. Department of Justice for the reprinting of my U.S. Treasury check as early as April 26, 2021. The Bureau of Fiscal Services will confirm that my U.S. Treasury Check, in the amount of **\$27,829,774.612 USD** on or about February 26, 2021 was deposited into the Merrill Lynch global account number #649-13284 that was mis-titled The Palm Beach County Sheriff's Office for the Benefit of Nicholas Phipps White by a fraudulent, fabricated person posing on my wife called "Erika White" who presented fraudulent Letters of Administration from Los Angeles County Superior Court, where a convoluted scheme and false narrative since 2018 in an attempt to legitimize herself as my alleged wife, evidenced in the fraudulent divorce proceedings in Erika White v. Nicholas White, Case No. 18STFL10165 (please see "Exhibit A."). On February 26, 2021, not only did the U.S. Department of Justice release my U.S. Treasury check to disgraced Tom Girardi posing as my father as the U.S. government's representative, but also to his wife, an actress, Erika N. Girardi, who had presented fraudulent Letters of Administration as "Erika White" endorsed my U.S. Treasury check as my Administrator, on behalf of the Estate of Nicholas White, deceased. The facts are, since May 2020 both DOJ and Bank of America had been being provided copies for my wife and I of our will, California driver licenses, powers of attorney designating my actual wife, Mirga Phipps White MBA, and the Stipulation For Compromise Settlement and Release Agreement, as agreed upon by the U.S. government, clearly stipulated that my wife or I, are the only two individuals authorized to pick-up my U.S. Treasury check.

However, on February 26, 2021, despite all U.S. government agencies reporting me as living and the U.S. Attorney's Offices of the Central District of California aware I was in Washington, DC that day awaiting for receipt of my check, DOJ and Bank of America still recognized the illegitimate Letters of Administration from a fraudulent "Erika White" claiming that I have no will and I am deceased. Although disbarred attorney Tom Girardi may claim he was at a doctor's appointment on February 26, 2021 with forensic psychiatrist Dr. Nathan Lavid of Long Beach, CA, Girardi's travel advisor Amber Ringler of En Route Travel of Pacific Palisades, CA, among others, will confirm the Girardi was in Washington, DC on February 26, 2021. Furthermore, the fact that the U.S. Department of Justice would have granted disgraced attorney Tom Girardi, a DOJ clearance to serve as U.S. government contractor at \$670 an hour, with knowledge of a fraudulent Italian passport claiming he is my father, is a clear conflict of interest and ethics. Even an interim clearance with Tom Girardi's Social Security Number: 548-50-5134 would have confirmed that he immigrated to the U.S. in 1954 from Italy, with now expired papers. Many believe Girardi poses a national security risk, with his disregard for U.S. laws and the more than 500 reported Victims of Tom Girardi. Whereby, his passport fraud was recently reported to the U.S. Department of Homeland Security, the Department of State and the Italian Consulate in San Francisco.

Additionally, we have determined that the more than 35 VISA debit cards holders have been accessing the proceeds deposited in the Merrill Lynch account #649-13284 from a fraudulent life insurance policy from Berkshire Hathaway Life Insurance Company of Nebraska issued to an "Erika White" fraudently posing as my wife that was written on me by Devon Investment Authority's Susan R. Bowersox, with offices in the Bank of America Building in San Francisco, CA, from July 28, 2020 which abruptly shuttered on March 12, 2021 just as you started your term as Attorney General. Devon is a company that I never retained for any services on my Merrill Lynch account or whatsoever (please see "Exhibit B"). The insurance fraud by the Administrator "Erika White" and the more than 35 Visa debit card holders who participated in this scheme was reported yesterday to the Berkshire Hathaway Life Insurance Company of Nebraska, whose Chairman and CEO Warren Buffett is copied today, as is Bank of America, who are currently in default.



Copyright © 2022 Sovereign Towers LLC





**PHIPPS**

Please note, before your confirmation by the U.S. Senate Judiciary Committee on March 10, 2021, I made multiple attempts to pick-up my Treasury Check but the DOJ also prohibited my father, Mr. Lawrence Phipps White, who serves as the Sovereign Towers Managing Director, and my actual wife, Mrs. Mirga Phipps White MBA and Power-of-Attorney, to pick-up my U.S. Treasury check on November 13, 2020 (please see "Exhibit B"). Additionally, on January 13, 2021, while in Washington, DC, I attempted to pick up my U.S. Treasury check with Tammy Reno at the EOUSA with attorney Alan Burch, formerly with the U.S. Attorney's Offices in Washington, DC, whereby it was promised that both a written confirmation and call from DOJ was to take place, which neither did occur. However, the only phone call we received was from Donald S. Burris (California Bar No. 68523) a substitute Judge in Los Angeles of Burris, Schoenberg and Walden, LLP, whereby, Richard E. Walden (California Bar No. 108646), who is a trust/estate attorney and substitute Judge in Los Angeles left to join Hymes, Schreiber & Walden. During this phone call, Burris threatened to fatally harm us, if we reported their involvement in drafting the fraudulent trust documents to the California Bar.

In closing, I kindly request that the U.S. Department of Justice provide a written confirmation to [ceo@thehollywoodlanddevelopmentcompany.com](mailto:ceo@thehollywoodlanddevelopmentcompany.com) by Thursday, March 24, 2022 by 12 Noon ET or that DOJ as required by U.S. law, has initiated the Bureau of Fiscal Service's Fraud Package containing SF 1133 (please see "Exhibit D") to be sent to me at the address below or for a good date and time during the week of March 28, 2022 for the U.S. Treasury check in the settled amount of \$27,829,774,612 USD payable to Pro Se Claimant, Nicholas Phipps White, in my U.S. social security number to be ready for me and former Ambassador and former Governor of Virginia Jim Gilmore, to pick up at U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530 c/o: Chief-of-Staff, Mr. Matthew Klapper, phone: (202) 514-2001.

Again, to date I have not received one dollar of benefit from the U.S. Treasury Check \$27,829,774,612 USD which has been properly reported stolen to the issuing agency. I sincerely look forward to hearing from DOJ to resolve this matter.

Respectfully submitted,

Mr. Nicholas Phipps White (Pro-Se Claimant)  
Chairman and CEO, The Hollywood Land Development Company LLC  
324 South Beverly Drive, Suite 489  
Beverly Hills, CA 90212  
(415) 539-6760

cc: President of the United States, Joseph R. Biden; former U.S. President Donald J. Trump; former U.S. President Barack H. Obama; His Majesty King Salman of Saudi Arabia; U.S. Treasury Secretary, Janet L. Yellen; Comptroller of the Currency Michael J. Hsu; FDIC Chairman Martin J. Gruenberg, California Attorney General Rob Bonta; Florida Attorney General Ashley Moody; Los Angeles County Sheriff Alex Villanueva; Warren E. Buffett, Berkshire Hathaway, Brian Moynihan, Bank of America; Andy Sieg, Merrill Lynch; Marriott International Chairman of the Board, Mr. J.W. Marriott; Sovereign Towers Managing Director, Lawrence Phipps White; Senate Judiciary Members;

Durbin, Richard J. (IL), *Chairman*  
Leahy, Patrick J. (VT)  
Feinstein, Dianne (CA)  
Whitehouse, Sheldon (RI)  
Klobuchar, Amy (MN)  
Coons, Christopher A. (DE)  
Blumenthal, Richard (CT)  
Hirono, Mazie K. (HI)  
Booker, Cory A. (NJ)  
Padilla, Alex (CA)  
Ossoff, Jon (GA)

Grassley, Chuck (IA), *Ranking Member*  
Graham, Lindsey (SC)  
Cornyn, John (TX)  
Lee, Mike (UT)  
Cruz, Ted (TX)  
Sasse, Ben (NE)  
Hawley, Josh (MO)  
Cotton, Tom (AR)  
Kennedy, John (LA)  
Tillis, Thom (NC)  
Blackburn, Marsha (TN)