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NATIONSTAR MORTGAGE LLC

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

14 NATIONSTAR MORTGAGE LLC,
15 Plaintiff,
16 vs.

CASE NO. 2:18-cv-03041 DSF (RAOx)
JUDGE: Hon. Dale S. Fischer
CTRM.: 7D

17 PATRICK JOSEPH SORIA, an
individual; WEST H&A, LLC, a
18 Delaware Limited Liability Company;
WARRANTED EFFECTUATION OF
19 SUBSTITUTE TRANSFEREE INC,
AKA W.E.S.T Inc., a Delaware
20 Corporation; WESTWOOD LEGAL, a
California Corporation; WESTWARD
21 LEGAL, a California Corporation;
BRIGHTON LEGAL GROUP, PC, a
22 dissolved California Corporation; BLG
PC NATIONAL BY BRIGHTON
23 LEGAL GROUP, INC., a Delaware
Corporation; DEUTSCHE MELLON
24 NATIONAL ASSET, LLC, a Wyoming
Limited Liability Company;
25 CHRISTIANA WILMINGTON
GLOBAL ASSET CORP., a Delaware
26 Corporation; HBSC US IN ITS
CAPACITY AS LEGAL TITLE
27 HOLDER INCORPORATED, a
Delaware Corporation; CAMDEN
28 LEGAL GROUP, PC, a dissolved

**DECLARATION OF JERED T. EDE
IN SUPPORT OF SUPPLEMENTAL
REPORT RE DEFENDANTS
PATRICK J. SORIA'S, WEST H&A
LLC'S, WESTWOOD LEGAL'S,
and HBSC US IN ITS CAPACITY
AS LEGAL TITLE HOLDER
INCORPORATED'S
COOPERATION AND
ADHERENCE WITH THE
CONTEMPT ORDER AND
FURTHER SHOWING OF
CONTEMPTUOUS BEHAVIOR**

ACTION FILED: April 11, 2018
TRIAL DATE: None Set

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1 California Corporation; TAMYRA
2 WHITE, an individual; GEORGE
3 WESLEY JR. PIERCE, an individual;
4 GRICELA MENDOZA, an individual;
5 BERNARD GERMANI, an individual;
6 REBEKAH BROWN, an individual;
7 MICHAEL C. JACKSON, an
8 individual; CYNTHIA LARA, an
9 individual; F. MARTINEZ, an
10 individual; JENNY DE LEON, an
11 individual; ELBA CHAVEZ, an
12 individual; RYAN ALEXANDER
13 UROQUIZU, an individual; ROGER
14 FRANKLIN, an individual; AND
15 WHATEVER NAME THEY MAY DO
16 BUSINESS UNDER; and DOES 1
17 through 10 inclusive,

18 Defendants.

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DECLARATION OF JERED T. EDE

I, Jered T. Ede, declare as follows:

1. I am an attorney at law duly licensed to practice before all of the courts in the State of California. I am a partner with the law firm of Hall Griffin LLP, counsel of record for Plaintiff NATIONSTAR MORTGAGE LLC in this action. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I attended the OSC re: Contempt hearing in this matter on May 30, 2018, at 1:30 p.m. During that hearing Defendant Patrick J. Soria took the stand and stated that he will provide, among other things, his iPhone to the Receiver. Once the hearing was over, I asked Mr. Soria if he provided his iPhone to the Receiver. Mr. Soria claimed that he did not have his iPhone on him because he left the phone in an "Uber." This Honorable Court resumed this session, and, Mr. Soria stated to this Court that he took an "Uber" to come to Court and left his phone with the "Uber" driver. The Court ordered Soria to provide the iPhone over that same day without deleting content. Soria alerted my office that he was in possession of the iPhone at 7:05 p.m. on May 30, 2018.

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1 3. Pursuant to the request for and permission of the Receiver, my office
2 was in receipt of Defendant Patrick Soria’s iPhone with phone number (818) 891-
3 9331 (the “iPhone”) on or about on the morning of May 31, 2018. A true and
4 accurate copy of a screenshot taken on this phone indicating that this iPhone does
5 belong to Patrick J. Soria is attached hereto as **Exhibit D**.

6 4. The iPhone provided to us did not have any SIM card installed.

7 5. After acquiring the iPhone, on May 31, 2018, I noticed that there were
8 no photos on the phone, no contacts on the phone, *and* there was no “Uber”
9 Application as one might expect to find had Mr. Soria in fact taken an Uber to Court
10 as he claimed. A true and accurate copy of the screenshot I took that stated there
11 were no contacts on the phone is attached hereto as **Exhibit E**.

12 6. Further, I reviewed the settings to see how much storage space was
13 used by photos on the phone. At first glance the phone indicated that there were
14 13.1 GB of data, which was surprising considering the phone contained no photos.
15 This appears to indicate Mr. Soria deleted 13.1 GB of photos from his phone just
16 prior to releasing it to my firm. A true and accurate copy of the screenshot I took is
17 attached hereto as **Exhibit F**.

18 7. My office provided the iPhone to a forensics expert, Neil Broom,
19 without having made any alterations to the content of the phone.

20 8. On June 1, 2018, Neil Broom provided my office with a forensics
21 report of the iPhone.

22 9. After review of the forensics report, as well as the location feature on
23 Soria’s iPhone, I was able to determine the following timeline for the iPhone’s
24 whereabouts on March 30, 2018:

- 25 **2:40 a.m. to 1:05 p.m.:** Soria’s iPhone was at the Waldorf Astoria;
26 **2:16 p.m. to 2:25 p.m.:** Soria’s iPhone was at “244 S. Palm,¹”
27 **3:50 p.m. to 5:07 p.m.:** Soria’s iPhone was at “244 S. Palm;”

28 ¹ This address appears to be that of Soria’s financier, Garson Silvers.

1 **5:15 p.m. to 7:51 p.m.:** Soria’s iPhone is back at the Waldorf Astoria.

2 Based on the above, it would appear that Soria lied to this Court regarding the
3 location of his phone, having left it initially in the custody of Garson silvers. A true
4 and accurate copy of the screenshots showing the location are attached hereto as
5 **Exhibit G.**

6 **CLEAR VIOLATION OF THIS COURT’S ORDER**

7 10. Even after being held in Contempt, Soria still sent an email from his
8 soria.patrick@gmail.com account on June 5, 2018, apparently to organize a plan to
9 meet up with B. Wolcott and others to give them a step by step guide on how to
10 continue the fraud by selling Hijacked Properties that they do not own. A true and
11 accurate copy is attached to this declaration as **Exhibit H.**

12 **MASS DESTRUCTION OF EVIDENCE**

13 11. When my office first obtained access to the numerous West Holdings
14 Group emails, the email account info@westholdingsgroup.com contained well over
15 17,000 emails. We lost access on or about May 14, 2018 and regained access on
16 May 31, 2018 after the hearing. Upon regaining access, that same email account,
17 info@westholdingsgroup.com, now contains *a total* of about 60 emails, *none of*
18 *which* even predates May 30, 2018. The May 30 Activity/Extraction Report, that I
19 was able to review, contains a chain of text messages between Soria and Steve
20 Median, where Soria was asking Steve why he did not inform Soria that if Soria
21 erased email messages online, that it would also erase them from Soria’s outlook.
22 During that text message exchange, Median specifically states “and if you remember
23 I told you probably not erase any emails that are on those online accounts for these
24 people that have requested to have access.” That text message exchange was
25 deleted but later recovered by Neil Broom. *See* Neil Broom Declaration (“Broom
26 Decl.”), ¶ 3, Ex. B.

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1 **ADDITIONAL CONTEMPTUOUS BEHAVIOR**

2 12. Soria and the Soria Defendants have also engaged in further
3 contemptuous behavior. I was able to obtain access to certain of the Receivership
4 Defendants' email accounts, which revealed that a large number of serious
5 violations continued to occur after this Court issued the Preliminary Injunction
6 Order (Dkt. No. 46). These violations include the following email communications:

7 a. On May 27, 2018, the Soria Defendants emailed Brett Wolcott a
8 list of 25 Assignments of Deeds of Trust on 25 properties, entitled "Going in
9 Tomorrow for the First set of New Recordings" which correspond to recordings
10 prepared by or on behalf of Soria's new companies. The email contains links to 25
11 Assignments of Deeds of Trust which the Soria Defendants prepared and attempted
12 to submit for recording on or about May 28, 2018. A true and accurate copy of that
13 email is attached to this declaration as **Exhibit I**;

14 b. On May 16, 2018, the Soria Defendants sent an email to Brett
15 Wolcott instructing him to open Worldwide Management Custom Services, LLC in
16 Wyoming, Delaware, Texas, and California. A true and accurate copy of that email
17 is attached to this declaration as **Exhibit J**;

18 c. On May 16, 2018, the Soria Defendants sent email
19 correspondence to Brett Wolcott with an attached Assignment of Deed of Trust for
20 Wolcott's execution on behalf of NexLex Real Estate Solutions and alleging to
21 hijack and claim assignment of a loan to Worldwide Management Custom Services,
22 LLC. The Soria Defendants' email also attaches a "Minute Book Certificate Book
23 of Worldwide Management Custom Services, LLC A Limited Liability Company
24 Organized Under the Laws of the State of Nevada," which also indicates that an
25 Employer Identification Number has been assigned, an Operating Agreement
26 completed, and that it is claiming to be related to "Brave Management Inc MBR"
27 and "Laughlin Associates, Inc." A true and accurate copy of that email is attached
28 to this declaration as **Exhibit K**;

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1 d. On May 22, 2018, the Soria Defendants exchanged
2 correspondences with a third party, A.D. at Fidelity National Title, with the Soria
3 Defendants attempting sell to hijacked properties and representing that the Soria
4 Defendants “have several homes in the area that may strike your fancy” and
5 scheduling a time to speak further. The emails also reference that this litigation is
6 pending. A true and accurate copy of that email is attached to this declaration as
7 **Exhibit L**;

8 e. On May 11, 2018, the Soria Defendants sent an email to Garson
9 Silvers re newly established email account (soria.patrick@gmail.com) and that
10 Defendant Soria needs another “bank run.” A true and accurate copy of that email is
11 attached to this declaration as **Exhibit M**;

12 f. On May 17-18, 2018, the Soria Defendants exchanged
13 correspondences with Brett Wolcott seeking MERS Milestones regarding hijacked
14 properties. Defendant Soria also sent Wolcott an attachment entitled “Mortgage
15 Packet for Purchase” regarding a hijacked property, which includes altered
16 Assignments and other documents, including a Promissory Note which is altered to
17 include an alleged allonge to Pay To The Order Of: WMCS, INC. without recourse
18 and executed by Patrick Soria as Managing Member of Deutsche Mellon National
19 Asset, LLC. A true and accurate copy of that email is attached to this declaration as
20 **Exhibit N**;

21 g. On May 23, 2018, the Soria Defendants emailed Christian Soria
22 with the business names and addresses for the corporate Defendants. A true and
23 accurate copy of that email is attached to this declaration as **Exhibit O**;

24 h. On May 27, 2018, the Soria Defendants changed the email
25 address for a user at Integrititle for the e-recording service CSC. A true and
26 accurate copy of that email is attached to this declaration as **Exhibit P**;

27 i. On May 30, 2018, the Soria Defendants added \$500 of the
28 Receivership Funds to a reloadable American Express credit card ending in 7710. A

1 true and accurate copy of that email is attached to this declaration as **Exhibit Q**;

2 j. On May 30, 2018, the Soria Defendants added \$500 of the
3 Receivership Funds to a reloadable American Express credit card ending in 7710. A
4 true and accurate copy of that email is attached to this declaration as **Exhibit R**;

5 k. On May 24, 2018 and May 26, 2018, the Soria Defendants
6 inquiring what they need to do in order for Westwood Legal to stay current with the
7 Better Business Bureau and address two pending files. The attachment reflects that
8 the Soria Defendants made a \$550 payment on behalf of Westwood Legal to the
9 Better Business Bureau for accreditation fees and programs on 5/26/18. A true and
10 accurate copy of that email is attached to this declaration as **Exhibit S**;

11 l. On May 7, 2018, the Soria Defendants have not served a copy of
12 the Order Entering the Preliminary Injunction and Appointing a Permanent Receiver
13 (Dkt. No. 46) on all parties to each action on each court in which an action against
14 Defendants, or any of them, is pending, as order by this Court.

15 13. My office has recently discovered that Soria and the Soria Defendants
16 are creating, utilizing, registering, and attempting to conduct business operations via
17 new corporate entities to continue their attempts to hijack properties, including
18 WorldWide Management Custom Services, Inc. aka WMCS, Inc. and NexLex Real
19 Estate Solutions.

20 14. Furthermore, my office represents Nationstar Mortgage LLC and other
21 Plaintiffs in a number of state law actions against the Soria Defendants. The Soria
22 Defendants have failed to serve a copy of the Order Entering the Preliminary
23 Injunction Against Defendants and Appointing a Permanent Receiver (Dkt. No. 46)
24 on all parties to each action on each court in which an action against Defendants, or
25 any of them, is pending, as specifically ordered by this Court.

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

2 Executed on this 5th day of June, 2018, at Santa Ana, California.

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5 Jered T. Ede

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