

1 **Karena A. Feng**
2 **1995 34th Avenue**
3 **San Francisco, Cal. 94116**
4 **Tel. 650-350-9088**
5 **Email: afengre@gmail.com**
6
7

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11
12 **KARENA A. FENG**

13 **Plaintiff**

14
15 **v.**

16
17 **PAUL PELOSI, JR., GEORGINA**
18 **RAMIREZ RODRIGUEZ, WILLIAM**
19 **GARLOCK, DAVID J. LONICH,**
20 **KEVIN R. MARTIN, GREENLAKE**
21 **REAL ESTATE FUND LLC, BANK OF**
22 **AMERICA, JOHN DOE, and JANE DOE**

23
24 **Defendants.**

25 **JURY TRIAL DEMANDED**
26

CASE NO.

COMPLAINT

27 **COMPLAINT FOR VIOLATION OF FOURTEENTH AMENDMENT, 18**
28 **U.S.C. 1961, et seq., CONSPIRACY TO COMMIT CIVIL RIGHTS**
29 **VIOLATIONS, and NEGLIGENCE**

30 **JURISDICTION**

- 31 1. This is an action for relief, proximately the result of conduct engaged in by the
32 Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David J. Lonich,
33 Kevin R. Martin, Greenlake Real Estate Fund LLC, and Bank of America in
34 violation of Fourteenth Amendment, 18 U.S.C. 1961, *et seq*, conspiracy to
35 Commit Civil Right Violations.
- 36 2. This Court has personal jurisdiction over the Defendants because all factual
37 allegations derive from violations of Fourteenth Amendment, 18 U.S.C., 1961 *et*
38 *seq*, and for the sake of judicial expediency, this Court has supplemental
39 jurisdiction over all other claims, brought now or ever, that are so related to
40 claims in the actions of the parties within such original jurisdiction that they form
41 part of the same dispute pursuant to 28 U.S.C. §1367.
- 42 3. This Court has subject matter jurisdiction over this dispute pursuant to 28 U.S.C.
43 §§1331 and 1338 (federal question jurisdiction). Jurisdiction is premised upon
44 the Federal defendants' violation of Fourteenth Amendment, and 18 U.S.C.
45 §1961, *et seq*.

46 VENUE

- 47
- 48 4. Venue is proper in this district pursuant to 28 U.S.C. §§1391 and 1400 because
49 the bulk of Plaintiff's business is transacted in the County of San Francisco,
50 California, and for the Defendants that do not, and for the sake of judicial

51 expediency, this Court has supplemental jurisdiction over the Defendants that are
52 so related to claims in the actions of the parties within such original jurisdiction
53 that they form the Court's jurisdiction is invoked pursuant to 28 U.S.C. §§1331,
54 1343.

55 THE PARTIES

56 5. Plaintiff, Kerena A. Feng (hereinafter "Plaintiff"), is a *sui juris* resident of San
57 Francisco, Cal. residing at:

58 1995 34th Avenue
59 San Francisco County
60 San Francisco, Cal. 94116
61 Tel. 650-350-9088
62

63 6. Federal defendant Paul Pelosi, Jr. (hereinafter "Pelosi") is a *sui juris* resident of
64 San Francisco, Cal. residing at:

65 333 Steiner Street, #4
66 San Francisco County
67 San Francisco, California
68 +1 (415) 225-9936

69 7. Federal defendant Georgina Ramirez Rodriguez (hereinafter "Rodriguez"), sued
70 in her individual capacity, is a *sui juris* resident of San Francisco, Cal. with a
71 principal place of business at:

72 40-29th Street
73 San Francisco County
74 San Francisco, Cal. 94110
75 +1 (605) 520-9859
76

77 8. Federal defendant William Garlock (hereinafter “Carey”) is a *sui juris* resident
78 of San Francisco, Cal. with a principal place of business at:

79 40-29th Street
80 San Francisco County
81 San Francisco, Cal. 94110
82 +1 (605) 520-9859

83 9. Federal defendant, David J. Lonich (hereinafter “Lonich”), is a *sui juris* resident
84 of Santa Rosa, Cal. residing at:

85 960 Doubles Drive, Suite 112
86 Sonoma County
87 Santa Rosa, Cal. 95407
88 +1 (707) 228-4446

89 Upon information and belief, Lonich is incarcerated.

90 10. Federal defendant Kevin Martin, is a *sui juris* resident of places unknown with a
91 principal business address at

92 1939 Harrison Street, #910
93 Alameda County
94 Oakland 94612
95 +1(510) 444-7600
96

97 11. Federal defendant Greenlake Real Estate Fund LLC (hereinafter “Greenlake”), is
98 the beneficiary of a property known as 2601-2611 24th Street, San Francisco, Cal.

99 94110 (a.k.a. 1300-1316 Utah Street, San Francisco, Cal. 94110) with a principal
100 place of business at:

101 1416 El Centro Street, Suite 200
102 Los Angeles County

103 South Pasadena, California 91030

104

105 12. Federal defendant Bank of America (hereinafter "BOA"), is the grantor of a
106 property known as 2601-2611 24th Street, San Francisco, Cal. 94110 (a.k.a. 1300-
107 1316 Utah Street, San Francisco, Cal. 94110) with a principal place of business
108 at:

109 399 E. Colorado Boulevard
110 Los Angeles County
111 Pasadena, California 91101

112 **STATEMENT OF FACTS**

113 13. On or about July 1998, Federal defendant Pelosi entered the business office of
114 Plaintiff which was Naturopathic Clinic but did not receive a treatment; Federal
115 defendant Pelosi continued to visit the Clinic ever day, again without asking for
116 or receiving treatments. A friendship ensued where Federal defendant Pelosi
117 came to know that Plaintiff was the owner of 2611 24th Street, a property with
118 20 single occupancy units on two floors and 5 stores on the ground floor with a
119 an approximate value of SIXTEEN MILLION DOLLARS (\$16,000,000)
120 according to a brokers appraisal attached herein as Exhibit "A." In total, Federal
121 defendant Pelosi came to know that Plaintiff was the owner of 3 properties with
122 a combined value of THIRTY ONE MILLION (\$31,000,000)

123 14. Upon information and belief, Federal defendant Pelosi targeted Plaintiff as a
124 wealthy real estate owner in San Francisco, Cal. that was an easy taking, and

125 through the creation of fictitious companies under fictitious names in conjunction
126 with Federal defendants Rodriguez, Garlock, Lonich, and Martin as co-
127 conspirators he took it by launching the following Forbearance Agreement which
128 is attached herein as Exhibit “A.”

129 15. On September 15, 2019, Borrower Feng 24th LLC, obtaining title by the
130 signature of Federal defendant Martin without Plaintiff’s knowledge and without
131 Plaintiff’s authorization transferring the Property from a wholly owned company
132 of the Feng Family, Feng RE, Inc. to a fictitious company, Feng24, LLC in which
133 Plaintiff held no ownership interest, and it is this fraudulent transaction that led
134 to this Complaint. Defendant Gina Rodriguez (a.k.a. Georgina Rodriguez, a.k.a.
135 Georgina Ramirez, a.k.a. Georgina Ramirez Rodriguez) is the sole owner of
136 Feng24 LLC as evidenced by the California Secretary of State’s Articles of
137 Organization attached as Exhibit “B.” As for Federal defendant Garlock, an
138 adversary has created a website named “Garlock Company Frauds” which can be
139 viewed at <https://garlockfraud.wordpress.com/tag/bill-garlock/> involving property
140 swindles in the same form complained of here.

141 **FOURTEENTH AMENDMENT – LEGAL STANDARD**

142 **Due Process Clause**

143 16. Section One of the Fourteenth Amendment to the United States Constitution
144 provides:

145 [N]or shall any State deprive any person of life, liberty, or property,
146 without due process of law.

147 17. In the past thirty-five years, the case law reads and is authority that:

148 18. In stating a claim of a violation of procedural due process, Plaintiff
149 alleges:

150 (1) the existence of a property or liberty interest that was deprived (the
151 ownership of 2601-2611 24th Street, San Francisco, Cal. 94110) and (2) deprivation
152 of that interest without due process as a fictitious companies, fraudulent
153 conveyances, and familial right.

154 19. In stating a claim of a violation of substantive due process, Plaintiff alleges
155 that: (1) she had a valid property or liberty interest (the ownership of 2601-2611 24th
156 Street, San Francisco, Cal. 94110), and (2) that interest was infringed upon in an
157 arbitrary or irrational manner (the arbitrary allegation of fictitious powers of
158 attorney”).

159 20. The title transfer “so shocking, arbitrary, and egregious that the Due Process
160 Clause would not countenance it even where it accompanied by full procedural
161 protection.”

162 a. So shocking in that Federal defendant Martin executed a Grant
163 Deed to transfer ownership of 2601-2611 24th Street, San

164 Francisco, Cal. 94110 without notice to Plaintiff, without the
165 Plaintiff's authorization, and without Powers of Attorney;

166 b. So arbitrary in that the fictitious company, Feng24, LLC was
167 named so similar to the ownership company, FengRE, Inc. that
168 tenants would remit rents much like they have all along.

169 c. So egregious in the glaring, flagrant actions of Federal
170 defendants, Plaintiff alleges the Federal defendants conduct a
171 property swindling racket in San Francisco led by Federal
172 defendant Paul Pelosi, Jr. who originally targeted the Plaintiff as
173 the Enterprises "pigeon" as defined by par.____.

174 21. As a result, by a. to c. above, Plaintiff has suffered the shock of her conscience
175 that persists to this day.

176 **18 U.S.C. 1961, et seq. – LEGAL STANDARD**

177
178 22. Plaintiff alleges that according to 18 U.S.C. 1961, et seq. (the "RICO
179 Statute"), and shows by a preponderance of the evidence, that there exists a
180 racketeering Enterprise in the County of San Francisco, California that consists
181 of: Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David J.
182 Lonich, Kevin R. Martin, and Greenlake Real Estate Fund LLC; plaintiff believes
183 Bank of America was negligent. Plaintiff alleges and shows with a clear and

184 convincing evidence that Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William
185 Garlock, David J. Lonich, Kevin R. Martin, and Greenlake Real Estate Fund
186 LLC, conspired and collaborated to concoct fictitious instances of property
187 default and they have mortgaged a property to the hilt and have absconded with
188 the money. 2601-2611 24th Street, San Francisco, Cal. 94110 is the subject of a
189 foreclosure sale on November 27, 2019 as a result of the frauds of the Federal
190 defendants.

191 23. Traditional RICO Statute predicate acts are contained herein and include: (i) mail
192 fraud (ii) wire fraud (iii) financial institution fraud (iv) witness tampering; (v)
193 obstruction of justice; (vi) extortion; (vii) retaliating against a witness, victim,
194 and (viii) a civil conspiracy to cover up mail fraud, wire fraud, financial
195 institution fraud, witness tampering, obstruction of justice, and retaliating against
196 a witness, victim. These predicate acts are pled with specificity in the instant
197 action.

198 24. The RICO Statute contains a provision that allows for the commencement of
199 a civil action by a private party to recover damages sustained as a result of the
200 commission of a RICO predicate offense(s). The RICO Statute also permits a
201 private individual "damaged in his business or property" by a "racketeer" to file
202 a civil suit. The plaintiff must prove the existence of an "enterprise", and Plaintiff
203 proves with a preponderance of the evidence of the existence of such an

204 enterprise Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David
205 J. Lonich, Kevin R. Martin, and Greenlake Real Estate Fund LLC. As pled
206 elsewhere in the instant action, the connections among these parties proves the
207 existence of an “enterprise.”

208 25. Plaintiff shows with specificity at least one of four specified relationships
209 between the defendant(s) and the Enterprise: either the defendant(s) invested the
210 proceeds of the pattern of racketeering activity into the Enterprise (18 U.S.C. §
211 1962(a)); or the defendant(s) acquired or maintained an interest in, or control of,
212 the Enterprise through the pattern of racketeering activity (subsection (b)); or the
213 defendant(s) conducted or participated in the affairs of the Enterprise "through"
214 the pattern of racketeering activity (subsection (c)); or the defendant(s) conspired
215 to do one of the above (subsection (d)). The Enterprise is either the 'prize,'
216 'instrument, 'victim,' or 'perpetrator' of the racketeers. A Civil RICO action can
217 be filed in Federal court.

218 26. The civil component allows the recovery of treble damages (damages in triple the
219 amount of actual/compensatory damages) and by Count Two and Judgment
220 Requested, Plaintiff demands treble damages in the amount of Ninety-Six Million
221 Dollars (\$96,000,000).

222 **Predicate Act: Mail Fraud**

223 27. 18 U.S. Code § 1512 (b) provides:

224 There are two elements in mail fraud: (1) having devised or intending to devise a
225 scheme to defraud (or to perform specified fraudulent acts), and (2) use of the
226 mail for the purpose of executing, or attempting to execute, the scheme (or
227 specified fraudulent acts).

228

229 28. When Federal defendant Martin executed a Grant Deed for the collective benefit
230 of the Enterprise, without notice, without authorization, and without powers of
231 attorney Martin devised or intended to devise a scheme to defraud (or to perform
232 specified fraudulent acts) and did so by use of the U.S. Mail (see *Schmuck v.*
233 *United States*, 489 U.S. 705, 721 n. 10 (1989); see also *Pereira v. United States*,
234 347 U.S. 1, 8 (1954) he violates the Statute.

235 **Predicate Act: Wire Fraud**

236 29. 18 U.S. Code § section 1343 provides:

237 Whoever, having devised or intending to devise any scheme or artifice to defraud,
238 or for obtaining money or property by means of false or fraudulent pretenses,
239 representations, or promises, transmits or causes to be transmitted by means of
240 wire, radio, or television communication in interstate or foreign commerce, any
241 writings, signs, signals, pictures, or sounds for the purpose of executing such
242 scheme or artifice

243

244 30. When Federal defendant Martin executed a Grant Deed for the collective benefit
245 of the Enterprise without notice, without authorization, and without powers of
246 attorney Martin devised or intended to devise a scheme to defraud (or to perform
247 specified fraudulent acts) and did so by use of the facsimile machine and
248 telephone in his fraudulent acts for the benefit of the Enterprise in defrauding

249 Federal defendant Bank of America for the benefit of the Enterprise; Bank of
250 America was negligent.

251 **Predicate Act: Financial institution fraud**

252 31. 18 U.S. Code § 1344 (b) provides:

253 Whoever knowingly executes, or attempts to execute, a scheme or artifice—
254 (1) to defraud a financial institution; or
255 (2) to obtain any of the moneys, funds, credits, assets, securities, or other property
256 owned by, or under the custody or control of, a financial institution, by means of
257 false or fraudulent pretenses, representations, or promises;
258

259 32. When the Federal defendants mortgaged 2601-2611 24th Street, San Francisco,
260 Cal. 94110 to the hilt without the intention to ever paying one cent in interest and
261 principal, as evidenced by Exhibit “C” they defrauded a financial institution;
262 Bank of America was negligent..

263 **33. Predicate Act: Obstruction of Justice**

264 34. At all times relevant hereto, all Federal defendants created false documents
265 fabricated existing documents, and made promises to Plaintiff the they never
266 intended to keep to keep her at bay while the swindle unfolded and began the
267 conspiratorial act of obstructing justice.

268 35. Federal defendant Gutierrez filed a fictitious, malicious detention report, without
269 evidence, and based on the incorrect standard of the preponderance of the

270 evidence as opposed to the standard of clear and convincing required by the U.S.
271 Supreme Court.

272 36. Federal defendant Haight obstructed justice, and in violation of Sixth
273 Amendment when she denied Plaintiff the right to seek the counsel of her choice
274 that allowed the Federal defendant(s) to invested the proceeds of the pattern of
275 racketeering activity into and fund the Enterprise (see 18 U.S.C. §1962(a)).

276 37. In fact, by implication in the instant action, the Federal defendants meet all four
277 of the specified relationships of par. 61: they funded the Enterprise; the Federal
278 defendants acquired and maintained an interest in the Enterprise through the
279 pattern of racketeering activity; the Federal defendants conducted or participated
280 in the affairs of the Enterprise through the pattern of racketeering activity; and
281 conspired to do one of the aforementioned, *res ipsa loquitur*.

282 38. Plaintiff was removed from the courtroom during the direct examination of HP
283 and KP. Federal defendant Haight refused to allow the cross examination of KP
284 and threatened Plaintiff; Federal defendant Carey corroborated the position of
285 Haight.

286 39. 18 U.S. Code § 1503 provides:

287 Whoever corruptly...endeavors to influence, obstructs, or impedes, or
288 endeavors to influence, obstruct, or impede, the due administration of justice.
289

290 40. Federal defendant Williams, on numerous occasions, committed perjury
291 under oath that cast an unwarranted negative light upon Plaintiff, thereby
292 usurping the power of the courts, and resulted in obstruction of justice.

293 41. On May 23, 2019, Federal defendant Maddock denied Plaintiff's request for
294 transcripts that would have implicated him in a violation of the First Amendment.

295 **Discussion**

296 42. 18 U.S.C. §1515 states:

297 ...the term "corruptly" means acting with an improper purpose, personally or
298 by influencing another, including making a false or misleading statement, or
299 withholding, concealing, altering, or destroying a document or other
300 information.

301 43. Plaintiff states, by the facts of the instant action make it abundantly clear that
302 Federal defendants Haight, Carey, and Lawrence coached HP, at all times
303 relevant thereto, a 12 year old, to untruthfully testify about Plaintiff's sex life that
304 did corruptly endeavor to influence, obstructs, or impedes, or endeavors to
305 influence, obstruct, or impede, the due administration of justice. In doing so,
306 Federal defendants Haight, Case, Carey, and Lawrence committed obstruction of
307 justice under Section 1503.

308 44. Federal defendants Haight, Carey, and Lawrence simply asked HP to tell less
309 than the whole truth and HP knew that he was being asked to tell less than the
310 whole truth, therefore Federal defendants Haight, Case, Carey, and Lawrence

311 corruptly influenced, obstructed, impeded, and endeavored to influence, obstruct,
312 or impede, the due administration of justice and is a violation of the statute, *res*
313 *ipsa loquitur*, and has harmed Plaintiff and the injury was caused by the violation
314 of 18 U.S.C.A. §§ 1961 .

315 **Predicate Act: Extortion**

316 45. On or about _____, Federal defendant Pelosi instructed Plaintiff to
317 “keep her mouth shut” or he would call DFCS in San Francisco and have her
318 children taken away. Upon on information and belief, Federal defendant Pelosi
319 filed a false report, which is par for the course, and Plaintiff’s children were
320 removed from her custody on November 26, 2018 that persists to this day.
321 Federal defendant Pelosi made it perfectly clear that either Plaintiff would “keep
322 her mouth shut” or risk never seeing Plaintiff’s kids again.

323 46. Extortion is defined as the obtaining of property from another with his or her
324 consent, by the wrongful use of either force or fear, or under color of official
325 right. The property or right to property must be obtained. This can be either the
326 property itself or the right to it.

327 47. Property rights that can be transferred to constitute extortion.

328 a. The right to prosecute a lawsuit or an appeal;

329 b. Obtaining an official act of a public officer can be the basis of
330 extortion.

331 48. If a person makes an extortionate demand in writing he/she may guilty even
332 if the victim parts with no property.

333 49. Any person who, by use of improper threat, another person's signature on any
334 document gets giving a property right may be charged with extortion even if the
335 property right is never actually obtained.

336 **CONSPIRACY TO DEPRIVE PLAINTIFF OF CIVIL RIGHTS –**
337 **LEGAL STANDARD**

338
339 50. Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David J.
340 Lonich, Kevin R. Martin, Greenlake Real Estate Fund LLC, and Bank of America
341 of her fundamental right to property.

342 51. Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David J.
343 Lonich, Kevin R. Martin, Greenlake Real Estate Fund LLC, and Bank of America
344 conspired to deprive Plaintiff of her

345 52. fundamental right to ownership of property.

346 53. Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David
347 J. Lonich, Kevin R. Martin, fabricated false allegations and false
348 documents about Plaintiff's property.

349 54. Federal defendant Pelosi then actually did fabricate false allegations
350 including the allegation that either Plaintiff does what he said to do or
351 he will call the Department of Family and Child Services (“DFCS”) to

352 take Ms. Feng's four children away and he did; Ms. Feng's children
353 were removed on a false report by Federal defendant Pelosi.

354 55. The County of San Francisco and social worker Amy Yim received the
355 false allegations on the urging of Federal defendant Pelosi, and knew
356 or reasonably should have known that the allegations were false.

357 56. The results of Federal defendant Pelosi's plan was the deprivation of
358 Plaintiffs' Due Process rights under the Fifth and Fourteenth
359 Amendments

360 57. Therefore, Federal defendant Pelosi is liable to Karena A. Feng, LF,
361 KF, EF, and RF for Conspiracy to Deprive Plaintiff and her children of
362 Civil Rights.

363 **NEGLIGENCE -- LEGAL STANDARD**

364 1. In these instances, Federal defendant Bank of America found itself caught up
365 in the web of the swindling conspirators who portray themselves as unrepentant,
366 recidivist, and perpetrators of personal injury that amounts to at least negligence.

367 2. In this action for negligence, Plaintiff positions the following four elements to
368 show that Federal defendant Bank of America acted negligently, albeit unbeknownst
369 to it:

370 a. Duty - The Federal defendant Bank of America owed a duty to Plaintiff
371 under the circumstances;

372 b. Breach - The Federal defendant Bank of America breached that legal
373 duty by acting or failing to act in a certain way; Causation - It was the
374 Federal defendant Bank of America John and Mary Ellen actions and
375 inactions that actually caused Plaintiff's injury; and

376 c. Damages – Plaintiff is harmed as a result of the Federal defendant Bank
377 of America actions and inactions in allowing the Enterprise to mortgage
378 out the property with fraudulent title, malicious intentions, and Federal
379 defendant is conducting a foreclosure sale of 2601-2611 24th Street,
380 San Francisco, Cal. 94110 is the subject of a foreclosure sale on
381 November 27, 2019 as a result of the frauds of the Federal defendants.

382 3. The Federal defendant Bank of America owed Plaintiff a legal duty of care.
383 The circumstances between Plaintiff and Bank of America created a legal duty in
384 that a duty of care is a legal obligation which is imposed on an individual requiring
385 adherence to a standard of reasonable care while performing any acts that could
386 foreseeably harm Plaintiff.

387 4. The Federal defendant Bank of America breached this duty by doing
388 something that a "reasonably prudent person" would not do under similar
389 circumstances. The term "reasonably prudent person" refers to a legal standard that
390 represents how the average person would responsibly act in a certain situation:

391 d. Federal defendant Bank of America breached their legal duty of care
392 when they failed to heed Plaintiff's warning that the Grant Deed was
393 executed without notice, with authorization, without power of attorney,
394 and that she received no proceeds from financially encumbering the
395 property known as 2601-2611 24th Street, San Francisco, Cal. 94110.

396 CONCLUSION

397 58. As opposed to burdening the District Court by submitting 100 pages of
398 attachments, Plaintiff will supply all that and more in Discovery. Therefore, there
399 are no conclusory statement in the instant action, *res ipsa loquitur*.

400 COUNT ONE

401 VIOLATION OF FOURTEENTH AMENDMENT

402 (Federal Defendants Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William
403 Garlock, David J. Lonich, Kevin R. Martin, and Greenlake Real Estate Fund LLC)

404
405 59. Plaintiff repeats and realleges each and every allegation contained in
406 paragraph "16" through "___," as though fully set forth herein.

407 60. As a result of the Defendants' acts, Plaintiff now suffers and will continue to
408 suffer irreparable injury and monetary damages, and that Plaintiff is entitled to
409 damages sustained to date and continuing in excess of the amount of **TWELVE**
410 **MILLION DOLLARS** (\$12,000,000) as well as punitive damages, costs, and
411 attorney's fees.

412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432

COUNT TWO
VIOLATION OF 18 U.S.C 1961, et seq,

(Federal Defendants Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David J. Lonich, Kevin R. Martin, and Greenlake Real Estate Fund LLC)

61. Plaintiff repeats and realleges each and every allegation contained in paragraph “16” through “121” as though fully set forth herein

62. As a result of the Defendants’ acts, Plaintiff now suffers and will continue to suffer injury and monetary damages, and that Plaintiff is entitled to damages sustained to date and continuing in excess of the amount of **TWELVE MILLION DOLLARS** (\$12,000,000) as well as treble damages, punitive damages, costs, and attorney fees.

COUNT THREE

VIOLATION OF CONSPIRACY TO COMMIT CIVIL RIGHTS

(Federal Defendants Paul Pelosi, Jr., Georgina Ramirez Rodriguez, William Garlock, David J. Lonich, Kevin R. Martin, and Greenlake Real Estate Fund LLC)

63. Plaintiff repeats and realleges each and every allegation contained in paragraph “16” through “___” as though fully set forth herein

64. As a result of the Defendants’ acts, Plaintiff now suffers and will continue to suffer injury and monetary damages, and that Plaintiff is entitled to damages sustained to date and continuing in excess of the amount of **TWELVE**

433 **MILLION DOLLARS** (\$12,000,000) as well as treble damages, punitive
434 damages, costs, and attorney fees.

435 **COUNT FOUR**

436 **VIOLATION of NEGLIGENCE**

437 (Federal Defendant Bank of America)

438 65. Plaintiff repeats and realleges each and every allegation contained in
439 paragraph “16” through “__” as though fully set forth herein

440 66. As a result of the Defendants’ acts, Plaintiff now suffers and will continue to
441 suffer injury and monetary damages, and that Plaintiff is entitled to damages
442 sustained to date and continuing in excess of the amount of **TWELVE**
443 **MILLION DOLLARS** (\$12,000,000), costs, and attorney fees.

444 **WHEREFORE**, a judgment is respectfully demanded:

445 a. Awarding against the individually named Federal defendant such
446 compensatory damages as the jury may impose, but not less than
447 **FORTY EIGHT MILLION DOLLARS** (\$48,000,000);

448 b. Awarding against the individually named Federal defendant such
449 punitive damages as the jury may determine, but not less than such
450 punitive damages as the jury may impose, but not less than **FORTY**
451 **EIGHT MILLION DOLLARS** (\$48,000,000);

452 c. Permanently enjoining the Federal defendants Paul Pelosi, Jr.,
453 Georgina Ramirez Rodriguez, William Garlock, David J. Lonich,
454 Kevin R. Martin, Greenlake Real Estate Fund LLC, and Bank of
455 America from further violation of the violation of the Fourteenth
456 Amendment, violation of 18 U.S. C. 1961, et seq., and violation of
457 Conspiracy to Commit Civil Right Violations.

458 d. Permanently enjoining Bank of America from conducting a foreclosure
459 sale of 2601-2611 24th Street, San Francisco, Cal. 94110 on November
460 27, 2019, and if such foreclosure sale is effected, claw back the
461 transaction until to the conclusion of these proceedings .

462 e. Awarding reasonable attorney's fees and costs; and,

463 f. Granting such other and further relief as this Court deems just and
464 proper.

465 **JURY TRIAL IS DEMANDED**

466 Plaintiff demands a trial by jury on all claims so triable.

467 Dated: November 14, 2019

468 San Francisco, Cal.

469 For Plaintiff:

470

471

472

473

Karena A. Feng

474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498

EXHIBIT "A"

499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523

EXHIBIT “B”

524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548

EXHIBIT “C”

549

550

551

552

553

554

555

556

557

558

559

560

561

562

EXHIBIT “D”