

1 **WALTER MARTIN, In Pro Per**  
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6 **PLAINTIFF**

7 **WALTER EMMANUEL MARTIN, in his official**  
8 **capacity as Trustee of the Gesner L. Martin Living**  
9 **Trust, *In Pro Per***

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **EASTERN DIVISION**

13 **WALTER EMMANUEL MARTIN, as an**  
14 **individual aggrieved, AND in his official capacity**  
15 **as TRUSTEE of the GESNER L. MARTIN**  
16 **LIVING TRUST,**

17 **Plaintiff,**

18 **vs.**

19 **SAMANTHA P. JESSNER, in her official capacity**  
20 **as Presiding Judge of Los Angeles County, and**  
21 **DAVID W. SLAYTON, in his official capacity as**  
22 **Executive Officer/Clerk of Court of Los Angeles**  
23 **County; LOS ANGELES COUNTY PROBATE**  
24 **DEPARTMENT, (hereinafter "LACPD"), TAMILA**  
25 **JENSEN, ESQ., CHEVON ROBINSON MARTIN,**  
26 **COMMISSIONER SCOTT NORD, JUDGE**  
27 **STEPHEN MORGAN, JUDGE BRENDA PENNY;**  
28 **ZEVETTE MITCHELL JONES MARTIN, ANICA**  
**BARBOSA, ONIEL MCINNIS, CHRISTIAN**  
**ORONSAYE, ESQ., SAYRA ALVARADO,**  
**JONATHAN BANUELOS and ZHANA AIVAZI,**  
**ESQ.**

**Defendants.**

**Does 1-20**

**FILED**

July 27, 2023

CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION AT SANTA ANA  
BY Nancy Boehme  
Deputy Clerk, U.S. District Court

Case No. 2:23-cv-04642-VBF(DFM)

**AMENDED VERIFIED COMPLAINT**

**JURY TRIAL DEMANDED**

1 COMES NOW Plaintiff WALTER MARTIN, (hereinafter “Plaintiff” or “Mr. Martin”), as an  
2 individual aggrieved, and in his official capacity as the former Trustee of the Gesner L. Martin Living  
3 Trust, and submits this Amended Verified Complaint, complaining of the Defendants SAMANTHA P.  
4 JESSNER, in her official capacity as Presiding Judge of Los Angeles County, and DAVID W.  
5 SLAYTON, (hereinafter “Defendant Slayton”) in his official capacity as Executive Officer/Clerk of  
6 Court of Los Angeles County, LOS ANGELES COUNTY PROBATE DEPARTMENT, (hereinafter  
7 “LACPD”), TAMILA JENSEN ESQ., (hereinafter “Defendant Jensen”), CHEVON ROBINSON  
8 MARTIN, (hereinafter “Defendant Chevon”), COMMISSIONER SCOTT NORD, (hereinafter  
9 “Defendant Nord”), JUDGE STEPHEN MORGAN, (hereinafter “Defendant Morgan”), JUDGE  
10 BRENDA PENNY, (hereinafter “Defendant Penny”), ANICA BARBOSA, (hereinafter “Defendant  
11 Barbosa”), CHRISTIAN ORONSAYE, ESQ. (hereinafter “Defendant Oronsaye”), SAYRA  
12 ALVARADO, (hereinafter “Defendant Alvarado”), ZHANA AIVAZI, ESQ. (hereinafter “Defendant  
13 Aivazi”), and Does 1-20, (collectively “the Doe Defendants”) and alleges and says as follows:

14 **Introduction**

15 1. The Superior Court of Los Angeles County, (sometimes “LASC”) is the California Superior  
16 Court located in Los Angeles County. It is the largest single unified trial court in the United States. It is  
17 also corrupt to the core<sup>1</sup>. The Superior Court operates 37 courthouses throughout the county. The  
18 Presiding Judge is Defendant Samantha P. Jessner. Defendant David W. Slayton is the Executive  
19 Officer/Clerk of Court.

20 2. These two Defendants, Jessner and Slayton, together with 583 judicial officers and 4,800  
21 employees operate the nearly 600 courtrooms throughout Los Angeles County. The LASC serves a  
22 population of over 10 million people and has an annual budget of over \$1 billion.<sup>2</sup>

23  
24  
25 <sup>1</sup> [www.petition2congress.com](http://www.petition2congress.com); [http://www.change.org/p/jail-all-corrupt-judges-in-the-stanley-mosk-courthouse-](http://www.change.org/p/jail-all-corrupt-judges-in-the-stanley-mosk-courthouse-the-black-robe-mafia)  
26 [the-black-robe-mafia](https://courtvictim.com/listen-to-blog-radio-expose-los-angeles-county-superior-court-corruption-fraud-scandal/); [https://courtvictim.com/listen-to-blog-radio-expose-los-angeles-county-superior-court-](https://courtvictim.com/listen-to-blog-radio-expose-los-angeles-county-superior-court-corruption-fraud-scandal/)  
27 [corruption-fraud-scandal/](http://thejusticechannel.blogspot.com/2021/04/probate-court-corruption-part-ii.html); <http://thejusticechannel.blogspot.com/2021/04/probate-court-corruption-part-ii.html>;  
<http://thejusticechannel.blogspot.com/2017/07/special-report-on-corruption-in-los-angeles.html>

28 <sup>2</sup>[https://www.lacourt.org/newsmedia/uploads/1420221215155922ADM\\_MC\\_0046\\_BIENNIAL\\_REPORT\\_15\\_FINALELECTR](https://www.lacourt.org/newsmedia/uploads/1420221215155922ADM_MC_0046_BIENNIAL_REPORT_15_FINALELECTRONICONLY.pdf)  
ONICONLY.pdf

1 3. The Los Angeles County Superior Court Probate Division (sometimes “LACPD”) has  
2 jurisdiction over decedents’ estates, trust proceedings, guardianship, conservatorship proceedings, and  
3 minors compromises.

4 4. Defendants Jessner, Slayton, and the LACPD, as well as the LASC, will sometimes be  
5 referred to herein as the Administrative Defendants.

6 5. The LACPD has no stated mission that can be discerned from the 2021/2022 Biennial Report,  
7 referenced herein. The publication states that:

8  
9 The Probate Division hears cases that involve especially vulnerable people, including  
10 the elderly and people with disabilities, along with family members who care for  
11 them.

12 6. The Report further states that “Probate Investigators, employed by the Court, are charged with  
13 the important work of investigating conservatorship and guardianship cases assigned to the Probate  
14 Division, and that these individuals conduct interviews with proposed conservatees and their family  
15 members.

16 7. In 2021/2022, the LASC’s 28 Probate Investigators conducted 2,949 conservatorship petition  
17 investigations and 3,223 guardianship petition investigations.

18 8. The LASC also has a Probate Volunteer Panel, (sometimes “PVP”) which is a panel of  
19 attorneys who register with the Los Angeles Superior Court to assist with the resolution of various  
20 probate proceedings. The PVP Panel consists of attorneys whom LASC judges appoint in probate and  
21 family law matters, including conservatorships, guardianships and related proceedings.


22 9. The PVP attorney’s compensation is usually paid from the conservatee’s estate (if there are  
23 resources) or by the County of Los Angeles. Probate Code section 1472(a) gives the court the authority  
24 to award fees and costs to such appointed attorneys, given that under LASC Local Rules, Rule  
25 4.127(b)(2), such attorneys agree to request compensation at “below market” hourly rates. In 2017 that  
26 was considered to be \$250 per hour.<sup>3</sup>

27  
28 <sup>3</sup> <https://www.calattorneysfees.com/2017/02/probate-la-superior-court-pvp-attorney-properly-awarded-714893-in-attorneys-fees-and-costs.html>


1 10. However, PVP attorneys are paid handsomely, and more often than not, directly bilk the  
2 estates of unsuspecting citizens of Los Angeles County, including the Plaintiff, out of millions of dollars,  
3 collectively, and with no oversight.

4 11. As with any attorney, a PVP attorney is required to zealously represent the interests of his or  
5 her client.

6 12. However, having been appointed by the LASC, the PVP attorney also has a secondary duty,  
7 which is “to assist the court in the resolution of the matter to be decided.” *See* Rule 10.85, Los Angeles  
8 County Superior Court Rules.

9 13. The obvious conundrum in conservatorship cases is that if the allegations of the  
10 conservatorship petition are true, i.e. that the conservatee may not have the legal capacity to enter into a  
11 contract, how can the PVP attorney have an attorney-client relationship with the conservatee? If the  
12 proposed client isn’t mentally competent, then how can an attorney rely on the client to state his or her  
13 desires? Likewise, if the conservatee is legally incompetent, is it in his or her best interest to fight the  
14 conservatorship proceeding? It is for this reason that the LASC judges proscribe this second duty to the  
15 PVP attorney - to assist the court with the resolution of the matter. 

16 14. It is for this reason that a PVP attorney frequently functions like an arm of the court,  
17 attempting to investigate the various allegations (especially in contested proceedings) and provide  
18 objective information about the status of the circumstances affecting the welfare of the conservatee.

19 15. However, an attorney who functions as an arm of the Court is trading perilously close to  
20 becoming a prosecutor. Yet a prosecutor, whether District Attorney or Assistant District Attorney, is a  
21 public employee whose salary is paid by taxpayer dollars. District Attorneys hold public office, and they  
22 are elected by the people they serve. They do not receive compensation from parties in the cases they  
23 handle, not from the defendants they prosecute nor from the victims of crimes whom they represent. 

24 16. The PVP program is therefore **inherently prone to corruption**. And the LASC PVP Program  
25 is corrupt to its core.

26 17. That corruption, and its impact upon the Plaintiff, as an individual, as a beneficiary of the  
27 Gesner L. Martin Living Trust, and as its former Trustee is the subject of this lawsuit.

28

**The Trust**

1  
2 18. The matters arising in this Complaint pertain to the Gesner L. Martin Living Trust  
3 established by Mrs. Gesner Martin, the Mother of the Plaintiff, who died on January 26, 2018. The trust  
4 was originally settled on September 23, 2011 and restated on September 11, 2014 by Mrs. Martin. Mrs.  
5 Martin presided over its administration as trustee until March 23, 2012, on which date she resigned as  
6 trustee, leading to the appointment of her son, Plaintiff Walter Martin, as successor trustee of the Trust.  
7 No person other than Gesner L. Martin and her son, Plaintiff, had ever been named, appointed, or  
8 otherwise recognized or identified in any way as trustee of the Trust.

9 19. As set forth in the express terms of the Trust, Mrs. Gesner L. Martin had three children,  
10 including Plaintiff Water Martin and Rex Martin, (who died on August 21, 2020, the circumstances of  
11 whose declining health and death are also addressed herein). The Trust provides explicitly for Plaintiff  
12 Walter Martin to serve as successor trustee following Gesner L. Martin. The trust also provides that  
13 neither Rex Martin, nor any of his children, one of whom is, putatively, Defendant Chevon, shall ever be  
14 appointed trustee under any circumstances.

15 20. In spite of all of the foregoing, on July 21<sup>st</sup>, 2023, Defendant Chevon Martin filed a Petition  
16 to remove Plaintiff as Trustee of the Trust in Los Angeles County Superior Court in Case No:  
17 18AVPB00069 *In re: Martin, Rex - Conservatorship*. In so doing, she cited as grounds the Plaintiff's  
18 filing of this very Complaint against her and the remaining Defendants.

19 21. Plaintiff has been the acting Trustee of his Mother's Trust since March 23, 2012. On the  
20 Plaintiff, and no other person has served as Trustee nor has performed the functions of a Trustee since  
21 that time.

22 22. This is true in spite of the fact that on March 6th, 2019, Defendant Scott Nord, Commissioner,  
23 entered an order, unbeknownst to Plaintiff, which purported to remove Plaintiff as Trustee of the Trust,  
24 but appointed no successor Trustee. As it was never served upon him, or his then attorney, Kenneth  
25 Gaugh, Plaintiff had no knowledge of this Order. He continued to fulfill all of the functions and duties  
26 as Trustee of the Trust, including paying all of the mortgages, utilities, insurance and taxes on each of  
27 the Trust properties, as well as maintaining the properties.  
28

1 23. Plaintiff only discovered Defendant Nord's March 2019 Order in April of this year. In May  
2 of 2023, Plaintiff filed an *ex parte* Motion to Vacate the Order issued by Defendant Nord in the LASC  
3 Probate Division Case No: 18AVPB00069 *In re: Martin, Rex - Conservatorship*.

4 24. On July 3<sup>rd</sup>, 2023, Defendant Judge Morgan issued an Order, a copy of which is attached  
5 hereto as **Exhibit A**, denying with prejudice Plaintiff's Motion to Vacate. Also in this Order, Defendant  
6 Morgan appoints Defendant Jensen to be the Probation Volunteer Panel attorney in this matter.

7 25. Also on July 3<sup>rd</sup>, 2023, Defendant Judge Brenda Penny entered an Order in the same case, a  
8 copy of which is attached hereto as **Exhibit B**, and file-stamped by Defendant DAVID W. SLAYTON,  
9 ordering that Defendant Jensen should be allowed to see all medical records of Rex Martin and should  
10 be compensated for her work as the Court appointed Attorney, but no less than \$250 per hour. Upon  
11 information and belief, this compensation will come from the assets of the Trust.

12 26. Despite the March 6, 2019 Order, no person other than Plaintiff had ever been openly and  
13 notoriously named, appointed, or otherwise recognized or identified in any way as the Trustee of the  
14 GLM Trust, nor had any person ever performed the functions as Trustee other than Plaintiff. Since  
15 March 23, 2012 no one other than Plaintiff has in any way presided over the many necessary financial,  
16 practical and material functions as Trustee over the Trust. Only Plaintiff had done these duties.

17 27. On July 10<sup>th</sup>, 2023, Defendant Morgan entered a new Order, a copy of which is attached  
18 hereto as **Exhibit C**, discharging Defendant Jensen and appointing a different PVP Attorney, Candace  
19 Jones, as the PVP attorney for this case.

20 28. Then again on July 14<sup>th</sup>, 2023, Defendant Judge Morgan entered a third Order, a copy of  
21 which is attached hereto as **Exhibit D**, vacating its July 10<sup>th</sup> Order, discharging Candace Jones, and  
22 appointing a third PVP attorney, a man named Mario Andre Pacione, as Court Appointed Counsel.

23 29. The three different permutations of this Order, in quick succession, should alone give this  
24 Court pause to consider what is going on in the Los Angeles County Superior Court system.

25 30. The unlawful RICO enterprise in which all Defendants are involved, and in which they have,  
26 conspired to defraud, defrauded, and continue defrauding the Trust of funds to which they were never  
27 entitled, by predicate acts of subterfuge, by taking positions of responsibility despite conflicts of interest,  
28

1 by deliberately breaching fiduciary duties and by outright lying to the Court, is the subject matter of this  
2 Complaint.

3 31. The Attorney Defendants have all been involved with the Plaintiff and the Trust by way of  
4 having been appointed or referred by the LACPD.

5 32. The LACPD has an intimate connection with all Defendants. The LACPD routinely supplies  
6 leads, including new candidates and new victims to the attorney Defendants, including Jensen, Aivazi  
7 and Oronsaye, (and many others) in this illegal RICO enterprise, for purposes of defrauding legal estates  
8 of decedents of Los Angeles County.

9 33. The LACPD is intimately involved in the RICO enterprise that has scammed and defrauded  
10 the GLM Trust and to exploit the Plaintiff, as well as his late brother, Rex Martin as will be shown  
11 herein.<sup>4</sup>

12 34. As the final days of her life neared, on or about January 28, 2018, for the grantor, Gesner L.  
13 Martin of her trust, the Gesner L. Martin Living Trust, Gesner had come a long way from her date of  
14 birth 1924 in the heart of Dixie, Birmingham, Alabama.

15 35. As a black woman, Gesner had survived the violence, the inequality and numerous  
16 infringements upon her Civil Rights. After settling in Los Angeles, California with her husband Major  
17 and four children, she went on to graduate from the University of California at Northridge and to work  
18 for 27 years for the California Employment Development Department.

19 36. In her 93 years of living, working, enduring hardship and sacrifices, it never occurred to her  
20 that at the end of her life, her equal right to decide the terms of her own Trust, and to select her Son,  
21 Walter Martin as her Trustee to administer and execute her Trust per her unique instructions would be  
22 stolen, and infringed upon by an overzealous judicial system and the actors within it.

23 37. It is also apparent that all of these predicate acts, as set forth in this Amended Verified  
24 Complaint, were undertaken in blatant disregard for Gesner L. Martin, her civil and legal rights and her  
25 ability to make her own competent estate planning decision.

26  
27 <sup>4</sup>The Defendant LACPD is intimately involved in multiple other estate scams and frauds and has defrauded numerous  
28 estates under its supervision. Additional lawsuits against the LACPD on behalf of other defrauded estates and  
beneficiaries will be forthcoming.



**The Nature of this Lawsuit**

.....

1  
2 38. Plaintiff brings this civil action against all Defendants under the Federal Racketeer  
3 Influenced and Corrupt Organizations Act, Chapter 96 of Title 18 U.S.C. § 1961 *et seq.* (hereinafter  
4 “RICO”). Pursuant to 18 U.S.C. § 1964, Plaintiff seeks treble damages, costs and attorneys fees from all  
5 Defendants, jointly and severally.

6 39. Plaintiff also brings this civil action under Title 42 U.S.C. § 1983 for the violation of  
7 Plaintiff’s constitutional rights under the Fifth and Fourteenth Amendments.

8 40. Plaintiff also brings this lawsuit against Defendants as set forth herein, for Civil Conspiracy,  
9 Fraud, Conspiracy to Defraud, Misrepresentation, Breach of Fiduciary Duty, Conversion, Unjust  
10 Enrichment, Intentional Infliction of Emotional Distress, and for Punitive Damages for their acts and  
11 omissions against the Plaintiff.

12 41. Defendants Samantha P. Jessner and David W. Slayton, (sometimes “the Administrator  
13 Defendants”) oversee, in a broad sense, the LASC and the LACPD.

14 42. Defendants Commissioner Scott Nord, Judge Stephen Morgan and Judge Brenda Penny,  
15 (sometimes “the Judicial Defendants”) are and have been complicit actors within the LASC and the  
16 LACPD RICO enterprise, and by their *ultra vires* actions have violated Plaintiff’s rights under Title 42,  
17 Section 1983, as set forth herein. These three will be referred to herein sometimes collectively as “the  
18 Defendant Judges”.

19 43. Defendant Jensen, who was appointed by the LACPD, who became a beneficiary of the Trust  
20 at issue in this case by fraudulent means, and who has bilked and will continue to bilk the Trust of  
21 thousands upon thousands of dollars, for no purpose other than to line her own pockets, has been and is  
22 being maintained in that scam artist role by the Defendant Judges.

23 44. Defendant Jensen is the main culpable “person” under the RICO statute, with the requisite  
24 *mens rea*, who is intimately involved with every other Defendant, advanced an illegal RICO enterprise  
25 that is sanctioned by the Defendants LASC, LACPD, Jessner and Slayton in order to defraud the  
26 Plaintiff, causing injuries and damages to the Plaintiff as set forth herein. Defendant Jensen did and  
27 does so through the use of false claims and through fraudulent activities involving the Plaintiff Trust, to  
28 the detriment and injury of the Plaintiff.



1 45. Defendant Jensen has received and continues to receive income from the illegal RICO  
2 enterprise, in violation of § 1962(a).

3 46. Defendant Jensen has maintained an interest in and/or control of the illegal RICO enterprise  
4 through a pattern of racketeering activity, as set forth herein, in violation of § 1962(b).

5 47. The remaining Defendants in this lawsuit engaged in the furtherance of activities carried out  
6 by the enterprise, in violation of § 1962(c), and have also received income directly from the illegal  
7 activities of the RICO enterprise, in violation of § 1962(b).

8 48. The remaining Defendants conspired with Defendant Jensen to violate and did violate  
9 subsections (a), (b) and (c) of § 1962 as set forth herein by engaging in predicate acts of the enterprise as  
10 defined by § 1961 of the RICO statute. *See also Reddy v. Litton Indus., Inc.* 912 F.2d 291 (9<sup>th</sup> Cir. 1990).

11 49. The enterprise is the association of all of the Defendants to this lawsuit, who are associated in  
12 fact, although the enterprise is not a legal entity. It is a continuing unit that has some type of  
13 organization as all Defendants have worked and are still working together in furtherance of the illegal  
14 enterprise, as set forth herein. 18 U.S.C. § 1964(4).

15 50. All Defendants have engaged in a pattern of racketeering activity, and carried out acts that  
16 are indictable under Title 18 of the United States Code, including, but not limited to bribery (Section  
17 201), mail fraud, which includes e-mail fraud (Section 1341), wire fraud (Section 1343), obstruction of  
18 justice (Section 1503), interference with commerce, robbery or extortion (Section 1951) and/or  
19 racketeering (Section 1952). All Defendants engaged in at least two such incidents within the past four  
20 years.

21 51. Defendant Attorney Jensen, and her client, Defendant Chevron, both of whom have criminal  
22 intent, worked together by committing mail fraud, wire fraud and obstruction of justice in furtherance of  
23 the illegal enterprise in order to disgorge the maximum funds from the Trust, by defraud the Plaintiff  
24 and the Court. Defendant Attorneys Aivazi and Jensen assisted their clients, Defendants Chevron and  
25 Alvarado in schemes to defraud the trust by making false claims against the Plaintiff, and to the court,  
26 and by fraudulent conduct getting themselves appointed as PVP Attorney and Conservator, respectively,  
27 and then helping themselves to the assets and proceeds of the trust with impunity.

28

1           52. Defendant Attorney Aivazi, and her client, Defendant Alvarado, as well as Defendant  
2 Attorney Oronsaye and his client Defendant Barbosa, all of whom have criminal intent, worked together  
3 by committing mail fraud, wire fraud and obstruction of justice in furtherance of the illegal enterprise in  
4 order to defraud the trust.

5           53. Defendants Alvarado and Barbosa, at the direction of Aivazi and Oronsaye sent identical  
6 emails to the Plaintiff trust falsely alleging that the properties held within the trust, which they rented,  
7 were not habitable, when in fact Alvarado and Barbosa, as tenants of trust properties, violated the lease  
8 agreements each had with the Plaintiff by failing to maintain the leased properties in habitable and safe  
9 conditions. They filed these false notices in order to defraud the trust and each did defraud the trust by  
10 illegally failing to pay rents that were due to the Trust under their lease agreements.

11           54. Defendant Oronsaye and his client, Defendant Barbosa both of whom have criminal intent,  
12 have worked together by committing mail fraud, wire fraud and obstruction of justice in furtherance of  
13 the illegal enterprise in order to defraud the trust.

14           55. Defendants Aivazi, Jensen and Oronsaye, all of whom are attorneys, and all of whom have  
15 criminal intent, have been bribed, have bribed each other and/or have received unauthorized information,  
16 referrals and bribes from the LACPD in furtherance of the illegal activities of the enterprise.

17           56. In addition to the harm perpetrated upon the Plaintiff, the aforementioned Defendants have  
18 received leads on estates in Los Angeles County and have helped themselves to the control, assets and  
19 proceeds thereof by getting themselves appointed as Conservators, PVP attorneys and the like, and  
20 turning around and cheating, stealing and robbing the estates of unsuspecting Los Angeles citizens,  
21 including the Plaintiff, and others as will be set forth herein.

22           57. The pattern of racketeering activity in which Defendants have engaged in consists of multiple  
23 predicate acts, as listed herein, which amount to or pose a threat of continued criminal activity. *H.J. Inc.*  
24 *v. Northwest Bell Tel. Co.*, 492 U.S. 229, 239 (1989).

25           58. The enterprise, by way of all Defendants benefited financially from these related crimes.

26           59. The pattern of racketeering activity which Defendants engaged in, including wire fraud and  
27 mail fraud, bribery and others had an effect on interstate commerce.

28

1           60. These crimes occurred multiple times over a substantial period of time and also continues  
2 presently. The predicate acts in which Defendants have engaged in have been continuous and are part of  
3 a long-term association that exists for criminal purposes. They are a regular way of conducting the  
4 Defendants' ongoing legitimate businesses in law and real estate, and/or are a regular way of conducting  
5 or participating in an ongoing and legitimate business.

6           61. Each Defendant did not necessarily know about each aspect of the enterprise, but each  
7 Defendant (1) agreed to participate in at least two racketeering acts, (2) knew the general status of the  
8 conspiracy, and (3) knew that the conspiracy extended beyond his or her individual role.

9           62. The racketeering activity in which Defendants engaged, in furtherance of the illegal RICO  
10 enterprise, injured and damaged Plaintiff personally, in his business and property, as a beneficiary of the  
11 Trust, and as the Trustee of the Trust.

12           63. A plaintiff must have both standing under Article III in order to bring a lawsuit. He must  
13 have (1) a concrete and particularized injury that (2) is caused by the challenged conduct and (3) is  
14 likely redressable by a favorable judicial decision. *See Friends of the Earth, Inc. v. Laidlaw Envtl. Servs*  
15 *(TOC), Inc.*, 528 U.S. 167, 180-81 (2000); *Jewel v. NSA*, 637 F.3d 902, 908 (9<sup>th</sup> Cir. 2011). A plaintiff  
16 need only establish a genuine dispute as to these requirements in order to survive a motion to dismiss or  
17 for summary judgment. *See Cent. Delta Water Agency v. United States*, 306 F.3d 938, 947 (9<sup>th</sup> Cir.  
18 2002).

19           64. Therefore Plaintiff has standing to sue under 18 U.S.C. § 1964. He brings this lawsuit in his  
20 individual capacity as well as in his official capacity as the former Trustee of the Trust.

21           65. Plaintiff was injured from the conduct of the affairs of the enterprise through a pattern of  
22 racketeering activity carried out by the Defendants.

23           66. The GLM Trust over which Plaintiff has presided as Trustee has also been irreparably  
24 damaged as the assets of the trust have been and are continuing to be unlawfully depleted.

25           67. The Defendants conspired to and did damage the reputation, standing and status of the  
26 Plaintiff as Trustee by making false claims in disregard of their obligations to be truthful to the Court,  
27 and in other ways as will be shown at the trial of this matter.

28

1 68. Plaintiff is therefore entitled to recover treble damages, costs and reasonable attorneys fees  
2 from all Defendants, jointly and severally.

3 69. Not every RICO violator who is a part of this enterprise is listed herein as a Defendant;  
4 however the actions of each, carried out in coordination with other Defendants and the enterprise is set  
5 forth herein. Plaintiff reserves the right to add additional violators as Defendants at a later time and/or  
6 to separately bring suit against them as new facts and evidence come to light.

7 70. The RICO violations committed by all Defendants, including Defendant Jensen include, but  
8 are not limited to wire fraud, mail fraud and obstruction of justice. These violations were committed  
9 over a substantial period of time, were continuous and interrelated, are ongoing, and have had and are  
10 still having an effect on interstate commerce.

11 71. The remaining Defendants assisted in the enterprise by: (1) working in partnership or  
12 otherwise in tandem with the LACPD and/or Defendant Jensen in advancing her illegal RICO scheme;  
13 (2) sheltering and protecting Defendant Jensen; (3) providing assistance to Defendant Jensen in  
14 furtherance of the illegal RICO scheme and by (4) otherwise working together in furtherance of a  
15 common illegal interest of the enterprise which Jensen advanced. All Defendants have thereby been  
16 unjustly enriched by the illegal scheme described herein, and all are jointly and severally liable to the  
17 Plaintiff for the damages each one has caused.

18 72. All Defendants have conspired and colluded together under a covert scheme to defraud the  
19 Gesner L Martin Living Trust. All Defendants have been unjustly enriched by defrauding the Plaintiff  
20 and disgorging funds from the Trust, and all Defendants have exploited the standing, duties and  
21 financial services of Plaintiff.

22 73. The acts and omissions of all Defendants, as described herein, have been, are and will be  
23 continuously financially damaging to the Plaintiff. In light of all of the foregoing, Plaintiff respectfully  
24 shows unto this Court as follows:

25 **The Parties**

26 74. At all times herein relevant Plaintiff WALTER EMMANUEL MARTIN, (hereinafter  
27 “Plaintiff” or “Mr. Martin”) is an individual residing in Los Angeles County. Plaintiff is and has been  
28 the acting Trustee in fact for the Gesner L. Martin Living Trust (sometimes “GLM Trust”) since

1 March 23, 2012 up through and including July 3<sup>rd</sup>, 2023.

2 75. Defendant SAMANTHA P. JESSNER, (hereinafter “Defendant Jessner”) is the Presiding  
3 Judge of Los Angeles County. She presides over the LACPD and all members of its staff, over the PVP  
4 Panel and all attorneys appointed under it, as well as over all judges, jurors, commissioners, prosecutors,  
5 defense, attorneys, clerks, bailiffs and court reporters. She assigns cases to departments and judges to  
6 departments. *See* Los Angeles Superior Court Local Rules § 2.1 and Los Angeles Superior Court  
7 Local Rules § 2.1. Defendant Jessner is sued in her official capacity. Whenever the LOS ANGELES  
8 COUNTY PROBATE DEPARTMENT, or LACPD is mentioned in this lawsuit, it is also mentioned as  
9 a euphemism for Defendant Jessner, since she controls it and is responsible for its acts and omissions.  
10

11 76. Defendant DAVID W. SLAYTON, (hereinafter “Defendant Slayton”) is the Executive  
12 Officer/Clerk of Court of Los Angeles County. He is sued in his official capacity. Whenever the  
13 LACPD is mentioned in this lawsuit, it is also mentioned as a euphemism for both Defendants Jessner  
14 and Defendant Slayton, since they control it and are responsible for its acts and omissions.  
15

16 77. At all times relevant herein, Defendant LOS ANGELES COUNTY PROBATE  
17 DEPARTMENT, a governmental arm of the Los Angeles County Superior Court has been a government  
18 organization, which has no stated purpose, but which routinely robs and loots the citizens of Los  
19 Angeles County who have the misfortune to come under its auspices.  
20

21 78. At all times relevant herein Defendant TAMILA JENSEN, ESQ., (hereinafter “Defendant  
22 Jensen”) is and has been a Probate Volunteer Panel Attorney (sometimes “PVP Attorney”) appointed by  
23 and servant of the Los Angeles County Probate Department. She was appointed as Conservator for Rex  
24 Martin, the deceased brother of the Plaintiff, by the LACPD. Defendant Jensen became a 25%  
25 beneficiary of the GLM Trust through deceit and fraud by way of a separate Conservatorship proceeding  
26  
27  
28

1 for Rex Martin. Defendant Jensen is intimately connected with the LACPD and with each of the  
2 remaining defendants.

3 79. Defendant Jensen is the principal RICO Defendant who advanced a scheme to defraud the  
4 Plaintiff and to disgorge as much money as possible from the GLM Trust, and did defraud the Plaintiff  
5 and the GLM Trust, along with the other named Defendants, in varying ways as set forth herein.  
6

7 80. At all relevant times herein Defendant CHEVON ROBINSON MARTIN, (hereinafter  
8 “Defendant Chevon”) was an individual residing in Los Angeles County, California. She is the adult  
9 daughter of Rex Martin, and is believed to be his non-biological daughter, and therefore the non-  
10 biological niece of Plaintiff Walter Martin. Defendant Chevon, a third-tier (16.6%) named beneficiary  
11 of the GLM Trust, conspired and colluded with Jensen to defraud the Plaintiff and the GLM Trust and  
12 did defraud the Plaintiff and GLM Trust.  
13

14 81. Defendant COMMISSIONER SCOTT NORD, (hereinafter “Defendant Nord”) is a LASC  
15 Commissioner who has acted outside of the law as a part of this illegal RICO enterprise. He is the judge  
16 who conspired with Defendants JENSEN and CHEVON to unlawfully remove Plaintiff as Trustee of his  
17 Mother’s Trust. In so doing he has deprived Plaintiff of his Civil Rights under Title 42 § 1983.  
18

19 82. Defendant JUDGE STEPHEN MORGAN, (hereinafter “Defendant Morgan”) is a LASC  
20 Judge who has acted outside of the law as a part of this illegal RICO enterprise. He is the Judge who,  
21 upon being told during a hearing on July 3<sup>rd</sup>, 2023 that Plaintiff had filed the original Complaint in this  
22 matter, became upset and reacted by entering an Order upholding Defendant Nord’s wrongful decision  
23 and re-appointing Defendant JENSEN, the main RICO defendant, with the requisite *mens rea* as the  
24 Court attorney in the matter. In so doing he is depriving Plaintiff of his Civil Rights under Title 42 §  
25 1983.  
26  
27  
28

1 83. Defendant JUDGE BRENDA PENNY, (hereinafter “Defendant Penny”) is a LASC Judge  
2 who has acted outside of the law as a part of this illegal RICO enterprise as a part of this illegal RICO  
3 enterprise. She entered an Order on July 3<sup>rd</sup>, 2023 awarding Defendant JENSEN the right to collect  
4 further funds while serving as the Court appointed attorney, funds which, upon information and belief,  
5 will come from further disgorgements from the Trust.  
6

7 84. At all relevant times herein Defendant ANICA BARBOSA, (hereinafter “Defendant  
8 Barbosa”), was and is an individual residing in Los Angeles County. She is a serial estate fraudster  
9 known to have a historical link with the LACPD, which supplies her with an unlimited supply of leads,  
10 candidates and victims to scam and defraud. She was a tenant of the one of the Trust’s properties, who  
11 rented the same from the Plaintiff. Defendant Barbosa conspired with her attorney, Defendant Oronsaye  
12 to defraud the Plaintiff.  
13

14 85. At all relevant times herein Defendant SAYRA ALVARADO, (hereinafter “Defendant  
15 Alvarado”), is a citizen and resident of Los Angeles County. She was a tenant of one of the Trust’s  
16 properties, who rented the same from Plaintiff. Defendant Alvarado conspired with her attorney,  
17 defendant Zhana Aivazi, to defraud the Plaintiff.  
18

19 86. At all relevant times herein, Defendant Attorney CHRISTIAN ORONSAYE, ESQ.  
20 (hereinafter “Defendant Oronsaye”), is an attorney who represented and/or represents Defendant  
21 Barbosa.  
22

23 87. At all relevant times herein, Defendant Attorney ZHANA AIVAZI, ESQ. (hereinafter  
24 “Defendant Aivazi”), is an attorney who represented, and/or represents Defendant Alvarado.  
25

26 88. At all times relevant herein, Defendant ONIEL MCGINNIS, (hereinafter “Defendant  
27 McGinnis”), was a citizen and resident of Los Angeles County. He was or is the common law or legal  
28



1 husband of Defendant Anica Barbosa and is and was involved in her mutual schemes and conspiracies,  
2 along with Defendant Oronsaye, to defraud the Trust.

3 89. At all times relevant herein, Defendant JONATHAN BANUELOS (hereinafter “Defendant  
4 Banuelos”) was a citizen and resident of Los Angeles County. He is the common law husband of  
5 Defendant Alvarado and is and was involved in her mutual schemes and conspiracies, along with  
6 Defendant Aivazi, to defraud the Trust.  
7

8 90. Defendant Aivazi deliberately exploited the trust, knowing since at least March 6, 2019 that  
9 the Trust was temporarily vulnerable due to a misinformed Los Angeles County Commissioner, Scott  
10 Nord who, believing the lies told by Defendant Jensen during a conservatorship proceeding regarding  
11 Rex Martin, entered an Order removing Plaintiff as Trustee in or around March 6<sup>th</sup>, 2019, in a judicial  
12 Order that Plaintiff was never served with and was unaware of the existence of until April of this year..  
13

14 91. Defendant Aivazi was noticed and informed by Defendant Oronsaye regarding the  
15 vulnerability of the trust, but said and did nothing to correct this. Defendant Oronsaye and/or other  
16 LACPD network participants recruited Aivazi to exploit and defraud the Trust using manufactured false  
17 claims.  
18

19 92. Does 1-20 are necessary parties that have yet to be identified. The true names and capacities  
20 of Defendants DOES 1-20 are currently unknown to Plaintiff, who therefore sues these Defendants  
21 under fictitious names pursuant to Code of Civil Procedure § 474. Each Defendant is directly and/or  
22 vicariously responsible in some manner, for the harms alleged herein. If/when Plaintiff learns these  
23 Defendants’ true names and capacities, Plaintiffs will seek leave to amend this pleading accordingly.  
24

25 93. Plaintiff is informed and believes and therefore alleges that each Defendant is jointly and  
26 severally liable for the occurrences alleged herein and also that Plaintiff’s injuries were directly and  
27 proximately caused by the acts and omissions of Defendants.  
28

**Jurisdiction and Venue**

1  
2 36. The Court possesses jurisdiction under 28 U.S.C. § 1331. Plaintiffs’ claims present a  
3 federal question under 18 U.S.C. §1965(a), and also under 42 U.S.C. § 1983.

4 37. Venue is proper in the Central District of California. The Plaintiffs resides in Los Angeles,  
5 California. Further, a substantial part of the events or omissions giving rise to Plaintiffs’ claims  
6 occurred in Los Angeles County California and because the facts giving rise to this Complaint  
7 substantially occurred in Los Angeles County. 28 U.S.C. § 1391(a)(2).  
8

9  
10 **Statement of Relevant Facts**

11 **I. Defrauding the Trust**

12 **(By Defendants Jensen, Aivazi, Oronsaye, Alvarado & Barbosa**  
13 **with the Blessing of the LASC, LACPD, Administrative and Judicial Defendants)**

14 94. Defendant Chevon is well known to the LACPD and to the attorney Defendants. Together  
15 she conspired with the LACPD, Defendant Jensen, and other defendants in her attempt to take over as  
16 conservator for her father Rex Martin, in a blatant attempt to try to secure assets for herself from the  
17 Plaintiff, to which she is not entitled.

18 95. As attorneys, Aivazi, Oronsaye and Jensen have conspired with the LACPD and Defendant  
19 Chevon, and have engaged in the illegal RICO enterprise solely in order to secure as much money in  
20 legal fees and as many trust assets as possible from the Plaintiff Trust.

21 96. Defendant Alvarado, and her attorney Defendant Aivazi, and Defendant Barbosa and her  
22 attorney Oronsaye have engaged in the illegal RICO enterprise by conspiring with the LACPD and with  
23 each other in their efforts to defraud the Trust.

24 97. Defendants Alvarado and Barbosa, at the direction of their respective attorneys, Defendants  
25 Aivazi and Oronsaye, each filed false Notices of Habitability reports with the Los Angeles Housing  
26 Department, (hereinafter “LAHD”), against Plaintiff on two respective properties which they had leased  
27 from Plaintiff, knowing the same to be false. Alvarado and Barbosa did so in an effort defraud the Trust  
28

1 by trying to avoid paying rent moneys and in so doing they have defrauded the Trust by many thousands  
2 of dollars.

3 98. Defendants Aivazi and Oronsaye, actively maintained a clandestine, covert relationship of  
4 communication, collusion via, phone, text, and email with each other both prior and after March 6, 2019  
5 and March 20, 2021 as it relates to multiple State Cases with the Plaintiff and or a prior relation with the  
6 Los Angeles County Probation Department.

7 99. Defendant Alvarado, at the direction of her attorney Defendant Aivazi, sent the false Notice  
8 of Abatement/Habitability to LAHD falsely accusing Plaintiff of failing to provide her with a habitable  
9 property.

10 100. The fraudulent Notice sent by Alvarado was worded identically to the false Notice of  
11 Habitability sent to the LAHD by Defendant Barbosa, at the direction of her attorney, Defendant  
12 Oronsaye. Defendant Alvarado, at the direction of her attorney, Defendant Aivazi, also attempted to get  
13 the Plaintiff to pay a tax bill on her own property by disguising it to the tax office.

14 101. In addition to the foregoing, Defendants Alvarado and Barbosa conspired to defraud the  
15 Plaintiff Trust by sending Plaintiff identical emails using the words “harassment” and “intimidation”  
16 after receiving a Notice of Landlord to Enter and Inspect the properties from the Trust, which both  
17 Alvarado and Barbosa rented from the Plaintiff.

18 102. In addition to the foregoing, someone or some individuals, as part of the unlawful enterprise,  
19 conspiracy and collusion by the Defendants mentioned herein, sabotaged and damaged the two  
20 properties which Alvarado and Barbosa rented from the Plaintiff.

21 103. Defendants Alvarado and Barbosa, together with their respective attorneys, Aivazi and  
22 Oronsaye, conspired and deliberate planned, as predicate acts of a pattern of racketeering, to make life a  
23 “living hell” and a “nightmare” for the Plaintiff as their landlord.

24 104. Defendants Alvarado and Barbosa, together with their attorneys, are, covertly or overtly, all  
25 business associates for purpose of carrying out the predicate acts, as described herein, of the unlawful  
26 enterprise.

.....

1           105. All of the foregoing predicates fraudulent acts were part of the unlawful RICO enterprise as  
2 set forth herein and were carried out by these Defendants and their attorneys in order to frustrate,  
3 damage and harm the Plaintiff.

4           106. All of the foregoing efforts by Defendants Alvarado and Barbosa, in conjunction and  
5 conspiracy with Defendants Aivazi and Oronsaye, and the subsequent failures by Alvarado and Barbosa  
6 to pay the Plaintiff rents due under the lease agreements have unlawfully depleted the assets of the  
7 Plaintiff Trust and damaged the standing of Plaintiff.

8           107. Defendants Aivazi and Oronsaye paired up with their two tenants, Defendants Alvarado and  
9 Barbosa, respectively, in carrying out fraudulent scheme to defraud the trust, which included aiding and  
10 abetting their clients in filing identical fraudulent Notices to Abate the properties which they rented from  
11 Plaintiff's trust.

12           108. Defendant Aivazi also directed her clients, Defendants Alvarado and Banuelos, to usurp and  
13 appropriate Plaintiff's rental property trust monies and use them as personal escrow down payment  
14 monies for their separate property acquisition of a house in San Fernando, California on or about July 1,  
15 2021.

16           109. Aivazi also directed her clients, Defendant Alvarado and Banuelos, direct the tax office to  
17 send Alvarado's tax on her escrow closing to Plaintiff for Plaintiff to pay. She thought Plaintiff would  
18 not notice and pay it and that that the tax office would not notice since the address on the property  
19 belonged to the Trust, while the APN (Assessor's Parcel Number) showed it to be Alvarado's property.

20           110. To this day, Defendant Aivazi continues to deflect, conceal and hide her current and  
21 historical professional, business and private relationship with Defendant Attorney Oronsaye.

22           111. Defendant Aivazi continues to deflect, conceal and hide her current, historical, business  
23 client lead and referral relationship with Defendant Attorney Oronsaye.

24           112. Defendant Aivazi continues to deflect, conceal and hide her law firm, Metis Law's current  
25 and historical business client lead relationship and referral relationship with Defendant Attorney  
26 Oronsaye.

27           113. Defendant Aivazi continues to deflect, conceal and hide her current and historical,  
28 professional and business relationship with Defendant Barbosa, the former client of Defendant Oronsaye

1 and source of business leads involving the Los Angeles County Probation Department and or network of  
2 PVP attorneys.

3 114. Defendants Aivazi and Oronsaye colluded and conspired to illegally profit from the GLM  
4 Trust, beginning on or around May of 2020, via the aforementioned landlord tenant exploitation plots  
5 wherein the tenants - Defendants Barbosa and Alvarado - would fabricate frivolous and wildly creative  
6 false habitability cross complaints against not only Plaintiff but other unsuspecting and law-abiding  
7 landlords, in order to profit thereby.

8 115. Defendant Aivazi was unjustly enriched from a for-profit internal client referral relationship  
9 with Defendant Oronsaye, in order for the both of them to exploit landlords during the COVID-19  
10 pandemic, when landlords were made more vulnerable, and to disgorge monies from them.

11 116. Due to the enormous population size of Los Angeles County, it is not uncommon for  
12 attorneys to supplement their income by performing contract services for the Los Angeles County  
13 Probate Department, acting as a Probate Volunteer Panel Attorney (hereinafter “PVP Attorney”) for hire

14 117. It is in this area that Defendant Aivazi works in synchronization with Defendant Oronsaye  
15 and others to hunt vulnerable cases and estates of the citizens of Los Angeles County and to exploit  
16 them by using block billing and false claims to gain control of lower income families during their most  
17 vulnerable moments - after the death of a loved one.

18 118. Aivazi and Oronsaye are both PVP predators, preying upon the vulnerable populations of  
19 Los Angeles County, as described herein. The LACPD is the organization that employs them and  
20 knowingly facilitates their predation.

21 119. The predatory acts of Oronsaye and his former client, Defendant Barbosa have been  
22 revealed in the public record in the probate of the estate of Edward Hill, of Los Angeles County  
23 Defendants Oronsaye and Barbosa disgorged the estate by hundreds of thousands of dollars.

24 120. Then the clandestine conspirator Attorney Aivazi joined Oronsaye, by networking and  
25 plotting attacks against Plaintiff, and other unsuspecting citizens, and cemented a close wolf-like attack  
26 network to systematically prey upon as many unsuspecting estate victims, including Plaintiff, as possible.  
27 Their victims will be named in an upcoming Class Action lawsuit to be filed against many of the same  
28 Defendants named in this lawsuit.

1 121. Aivazi regularly communicates with Oronsaye via email, telephone, text, and US mail and  
2 have transferred or otherwise wired the shared funds which they have manipulated out of so many  
3 victims of Los Angeles County.

4 122. These Defendants have done all of the foregoing while working covertly on a regular basis  
5 to conceal and misrepresent the reality of their actions to the public.

6 123. Aivazi and Oronsaye constantly plotted in furtherance of the RICO enterprise, as described  
7 herein, by cheating estate victims, purporting to be fiduciary representatives, while concurrently  
8 working covertly to conceal and misrepresent their true actions - cheating and robbing as many estate  
9 victims as possible, with the blessing of and at the direction of the LACPD.

10 124. For purposes of this lawsuit, these Defendants conspired together to defraud and did defraud  
11 the GLM Living Trust, which injured Plaintiff, as described herein.

12  
13 **II. The Conservatorship Proceeding**  
14 **(Collusion to Defraud and Defrauding the Court and the Trust**  
15 **by Defendants Jensen, Chevon and Nord)**

16 125. This case also pertains to a petition for conservatorship filed on March 1, 2018 for Rex  
17 Martin, the son of Gesner L. Martin and the brother of Walter Martin. The petition was filed, *in pro per*  
18 by Rex Martin’s putative daughter, Defendant Chevon, who sought to be appointed his conservator,  
19 solely to gain as much of the Trust assets for herself as possible.

20 126. Article 9 of the Trust provides terms relevant to the special needs of the beneficiaries, but  
21 does not require the creation of any separate special needs trust. With regard to an incapacitate  
22 beneficiary, Article 9 also provides two options from which the trustee may, in his discretion, select.  
23 The first option allows the trustee to make distributions for the beneficiary’s benefit according to  
24 specific directions. The second allows the trustee to create a separate trust for the retention and  
25 administration of assets designated for the beneficiary.

26 127. On May 17, 2018, Defendant Chevon stipulated to the appointment of Commissioner Scott  
27 Nord as Commissioner for the case.

28 128. Defendant Chevon was represented in the Conservatorship by Defendant Jensen, who had  
been appointed Probate Volunteer Panel (hereinafter “PVP” attorney) by the LACPD.

1           129. Defendants Chevon and Jensen, as part of the unlawful RICO enterprise, colluded and  
2 conspired to defraud the Court in order to obtain Plaintiff's assets to which they were not entitled,  
3 through the misrepresentation and fraud.

4           130. Defendant Jensen made false and misleading representations to the Court about the  
5 provisions of the Gesner L. Martin Living Trust and its provisions, with the intention of deceiving the  
6 Court and the Plaintiff. She provided false information to Commissioner Scott Nord about the Trust,  
7 which resulted in an erroneous probate Order.

8           131. Defendant Jensen breached her fiduciary duty to Defendant Chevon by colluding with her  
9 to defraud the Court.

10           132. Defendant Jensen and Defendant Chevon conspired to defraud the Plaintiff by making false  
11 statements and insinuations to the Court and otherwise engaging in other unlawful conduct in  
12 furtherance of the illegal RICO enterprise.

13           133. Defendant Jensen's abusive and dishonest attitude towards the Plaintiff caused him needless  
14 emotional distress.

15           134. By engaging in fraud, as set forth herein, Defendant Jensen and Defendant Chevon  
16 converted assets from the Plaintiff Trust for their own use in violation of the law, and did so in  
17 furtherance of the illegal RICO enterprise.

18           135. The matter came on for hearing before Defendant Nord on August 23, 2018. Two days  
19 prior, Defendant Jensen filed a supplemental report in which she deliberately mischaracterized the Trust  
20 and its terms.

21           **136.** Plaintiff attended this hearing without counsel, as an individual concerned about his brother  
22 Rex Martin's deteriorating health and medical needs. Plaintiff provided testimony to the Court in this  
23 regard His testimony focused solely on issues pertaining to his brother's health situation and needs.

24           137. After he did so, Defendant Nord began *sua sponte* questioning Plaintiff - a person over  
25 whom the Court had no personal jurisdiction, about the proposed, non-existent special needs trust of the  
26 GLM Trust - a matter over which the Court had no subject matter jurisdiction.  
27 .....



1 138. This was an impromptu probate hearing by the Commissioner during a conservatorship  
2 hearing. It was without consent or authority. No Summons, notice or petition regarding the GLM Trust  
3 had issued regarding any hearing about the GLM Trust.

4 139. Plaintiff was unrepresented by counsel. Plaintiff had retained Attorney Mark Swatik, Esq.,  
5 to represent the interests of the Trust, but Swatik was intentionally left out of the communication loop by  
6 Defendant Jensen. Despite all of this, Defendant Nord then began intensely questioning Plaintiff about  
7 the probate matter.

8 140. Defendant Nord asked him, “Is there a reason why you are refusing to provide Ms. Jensen  
9 with a copy of the trust and the special needs trust.” To which, Plaintiff responded, “Your Honor, that’s  
10 a total misrepresentation.”

11 141. Unrepresented by counsel, and grieving the declining health of his brother, seeking the  
12 Court’s help, the Plaintiff was intimidated by the Commissioner’s questioning, Plaintiff continued  
13 answering the questions in the probate matter. He informed the Court that the Trust owned five real  
14 properties with a combined total of less than \$600,000. He also informed the Court regarding the terms  
15 of the trust that pertain to a potential special needs trust for Rex Martin.

16 142. At the conclusion of the hearing, Defendant Nord granted Defendant Chevon the authority  
17 to move Rex Martin, and set a new hearing for December 13, 2018.

18 143. Also at the conclusion of this *sua sponte* hearing, Defendant Nord announced that he was  
19 going to unilaterally assume jurisdiction over the special needs trust for Rex Martin, froze all assets  
20 within the trust and suspended Plaintiff’s ability to act as Trustee until further court order. He awarded  
21 Defendant Jensen \$6,250 in attorneys fees, and then discharged her<sup>5</sup>. In addition to this, the Court took  
22 jurisdiction over the entire GLM Trust, without suspending Plaintiff’s authority, but then decided to

23 hold that in abeyance pending the outcome of you doing the following things:  
24 you are to provide a full accounting of the trust to Ms. Jensen. You are  
25 to provide a full accounting of the special needs trust to Ms. Jensen. You are to  
provide her with a copy of both trusts. and when we come back, I will look for

26 <sup>5</sup>Despite being discharged, on October 18, 2018, Jensen submitted a fee application for an additional \$11,838.80 for her  
27 “services” rendered in the conservatorship, indicating also that she believed she would need to bill another 30 hours in  
28 the future, all of this at \$400 per hour. The submission of all of this time was for her fraudulent services on behalf of  
Rex Martin, using false-block billing. These funds were paid for from the Trust and the Trust is entitled to their return.

1 her report as to whether or not further action needs to be taken including  
2 appointing a professional fiduciary to take over this matter.

3 144. Despite Defendant Nord hijacking the hearing, and converting it to a probate hearing, at the  
4 end of it, Plaintiff asked the Court, “In terms of seeing . . . is there anything we can do as far as getting  
5 medical -- to my brother?”

6 145. Defendant Nord thus presided over *sua sponte* probate proceedings regarding the GLM trust  
7 and issued the COVERT order without proper foundation, knowledge or legal cause. He did so also  
8 after Plaintiff had departed from the Courtroom and thus had no notice of same.

9 146. At the conclusion of this hearing, Defendant Nord purported to suspend Plaintiff from  
10 trusteeship of the supposed special needs trust and threatened to suspend him from trusteeship of the  
11 Trust, based solely upon Jensen’s fraudulent report.

12 147. In October of 2018, Plaintiff provided a copy of the Trust and a certificate of trust to  
13 Defendant Jensen.

14 148. On December 10, 2018, Plaintiff filed a declaration attesting to having provided Defendant  
15 Jensen with a copy of the trust, and also stated that he had appeared at the August 2018 hearing out of  
16 concern for his brother and not as Trustee of the Trust. He declared that he would not appear further in  
17 the Conservatorship matter.

18 149. The minutes from the December 13, 2018 hearing discharge Defendant Jensen, order her to  
19 be paid, (an \$11,800 bill from October) and direct her to “prepare the Order freezing the Trust” without  
20 further detail. No representative of the Trust was called to, noticed for or present at this hearing.

21 150. On March 6, 2019, nearly 7 months after the hearing, Defendant Nord signed and entered an  
22 Order entitled “Order After Hearing Removing Trustee and Freezing Assets of Gesner Martin Trust.”  
23 The Order states that the Plaintiff “has failed to administer the Trust in good faith,” and had “failed to  
24 administer the special needs trust which is within the Trust for the benefit of Rex Martin.”

25 151. The March 6, 2019 Order was covertly entered by an emotional and misinformed Defendant  
26 Nord due to the negligent misrepresentations made by Defendant Jensen. It is currently the subject of a  
27 Motion to Vacate.  
28

1           152. Attached to the Order is a proof of service form dated February 11, 2019. It is addressed to  
2 Plaintiff, but incorrectly states his address.

3           153. The purported proof of service form also recites service upon Plaintiff’s then-counsel,  
4 Kenneth Gaugh, however, Mr. Gaugh has testified that he has no knowledge of his office ever receiving  
5 service of this Order. Most importantly, at that time, Mr. Gaugh represented a man named Monte  
6 Parrish, who was the proposed alternative conservator to Defendant Chevron. Both the Plaintiff and the  
7 Trust were unrepresented.

8           154. Plaintiff was never notified of the existence of this Order, and no copy of this Order was  
9 ever sent to or otherwise provided to Plaintiff. He was not even aware of its existence until March of  
10 2023 when it came to light through investigation by undersigned counsel. Undersigned counsel is  
11 currently representing Plaintiff in a lawsuit against Defendant Barbosa, who was a tenant that defrauded  
12 the Trust. *See Walter Martin Trustee for the Gesner L. Martin Living Trust v. Anica Barbosa*, Superior  
13 Court of California, L.A. North Central District, Case No. 20CHCV00307.

14           155. Without knowledge of the order, and without any effort or means to contest his authority or  
15 to access Trust assets, Plaintiff has continued, interrupted, to act as trustee of the Trust and continues to  
16 do so through the present day. His tasks have included overseeing the payment of taxes and mortgage-  
17 secured related notes to the real property owned by the Trust.

18           156. Upon information and belief, Defendant Jensen took the position alleged by Defendant  
19 Chevron, with whom she conspired and colluded to defraud the GLM Trust.

20           157. Defendant Jensen bullied, lied, threatened and engaged in misrepresentation, fraud and  
21 abuse of the legal process. She colluded and conspired with Defendant Chevron, in furtherance of the  
22 illegal RICO enterprise, as described herein.

23           158. The act of hijacking the conservatorship hearing to hold an impromptu hearing in the  
24 probate case was done by Defendants Jensen and Martin solely to harm Plaintiff and commit fraud. All  
25 of this was done in furtherance of the illegal RICO enterprise.

26           159. Given that no successor trustee was ever appointed, the very existence of this Order, which  
27 was procured by fraudulent means, has created a threat to the Trust and its interests.  
28

1           160. This Order damaged Plaintiff and the Trust, as no subsequent trustee was ever appointed to  
2 take care of the everyday responsibilities of the GLM Trust. This act has irrevocably damaged both  
3 Plaintiff and the Trust financially because it has allowed for the depletion of trust assets, and because  
4 Plaintiff is the personal guarantor of all loans for the benefit of the Trust.

5           161. As Trustee, Plaintiff paid the mortgages and insurance on four properties with no defaults or  
6 collections. Plaintiff also paid all property taxes.

7           162. As Trustee, Plaintiff reduced the grantor's mortgage interest rates by refinancing them from  
8 a ten percent (10%) interest rate to 4.75 % and 5.25 %. Over a five year period, this provided a net  
9 savings to the Trust of hundreds of thousands of dollars.

10           163. Plaintiff did so on the back of his personal credit of 740 FICO. The net savings to the Trust  
11 over a five year period saved a total of \$400,000.

12           164. Plaintiff also guaranteed bank and personal loans in his name for the betterment of the trust  
13 while such funds were concurrently being disgorged by the fraudulent acts and omissions of all of the  
14 Defendants.

15           165. Defendant Jensen and Defendant Chevon exploited the Plaintiff for fees, property  
16 maintenance, repairs and construction under a rogue, latent, covert and fraudulently induced Court order.

17           166. Due to these Defendants clandestinely and covertly colluding and conspiring to undermine  
18 the Plaintiff, as Trustee for the GLM trust, for personal financial gain, knowing that they had  
19 undermined the trust standing without legal disclosure the Trust has been irrevocably damaged.

20           167. In addition to all of this, on August 23, 2018, the same date as the hearing, Defendant  
21 Chevon filed for a Restraining Order against Plaintiff. This Order was never served on Plaintiff.  
22 Defendants Jensen and Nord acted in haste causing the Plaintiff irreparable damages.

23           168. In her 93 years of living, working, enduring hardship and sacrifices, it never occurred to her  
24 that at the end of her life, her equal right to decide the terms of her own Trust, and to select her Son,  
25 Walter Martin as her Trustee to administer and execute her Trust per her unique instructions would be  
26 stolen, and infringed upon by an overzealous judicial system and an ill-informed racially biased  
27 commissioner.  
28



1 Martin with her Trust is not only void on all points of law but it a continued blatant disregard of Mrs.  
2 Gesner's legacy and her equality as a woman, as a black human being and a posthumous infringement of  
3 her Civil Rights as an American Citizen.

4 177. Defendant Nord's order on March 6, 2019 was entered clandestinely, covertly and in  
5 complete violation of the law.

6 178. Prior to selecting Defendant Nord, Defendant Jensen conspired with Defendant Chevon for  
7 purposes of trying to divert child support payments from Rex Martin.

8 179. Upon information and belief on or about April of 2018, one Natalie Weingrow, a Los  
9 Angeles County child support services employee clandestinely dispatched an investigator from Los  
10 Angeles County Child Support to interview the Plaintiff under false pretenses, in order to enjoin the  
11 Trust in violation of the Trust's explicit guidelines.

12 180. Upon information and belief, it appears that Defendant Jensen was already working with  
13 Los Angeles County Child Support at least as early as 2018, and the acts and omissions of Jensen, as  
14 described herein, in procuring the March 6, 2019 order were more about getting access to Rex Martin's  
15 retroactive child support arrearages for Defendant Chevon as opposed to gaining any Trust assets for  
16 Defendant Chevon.

17 181. Upon information and belief, Defendant Chevon worked with Defendant Barbosa to  
18 perpetrate the false Notice of abatement in order to disgorge and damage the Trust.

19 182. All of the foregoing was in blatant disregard of the Trust's estate and the rights of the  
20 beneficiaries and in furtherance of the illegal RICO enterprise.

21 183. Rex Martin's kidnapping, unnecessary suffering and untimely death, which were  
22 promulgated by the Administrative and Judicial Defendants, as well as Defendants Jensen, Chevon and  
23 Zevette, has had a devastating impact upon Plaintiff as the brother of Rex Martin.

24  
25 **IV. Further Predicate Acts in Furtherance of the Illegal RICO Enterprise**  
26 **(Defendants Alvarado, Barbosa, Aivazi and Oronsaye)**

27 184. Defendants Sayra Alvarado and Anica Barbosa were both tenants of properties owned by  
28 the Trust while it was managed by the Plaintiff. Both Defendants defrauded the Plaintiff by filing false

1 claims against him as the landlord of the respective properties. These false claims are included among  
2 the predicate acts of the illegal RICO enterprise which have resulted in Plaintiff filing lawsuits against  
3 both Defendants in *Walter Martin Trustee for the Gesner L. Martin Living Trust v. Anica Barbosa*,  
4 Superior Court of California, L.A. North Central District, Case No. 20CHCV00307 and *Walter Martin*  
5 *Trustee for the Gesner L. Martin Living Trust vs. Sayra Alvarado*, Superior Court of California, L.A.  
6 North Central District, Case No. 20CHCV00303.

7 185. Plaintiff is in possession of a plethora of evidence showing Defendant Chevon's link with  
8 Defendants Barbosa and Alvarado in these overt acts to clandestinely defraud the trust. They  
9 communicated with each other and filed identically worded false and fraudulent Notices to Abate with  
10 the Los Angeles County Health Department for the properties in which they were tenants, which were  
11 managed by the Plaintiff.

12 186. Defendant Barbosa is also known to have a historical link with the Defendant Los Angeles  
13 County Probate Department that Jensen serves.

14 187. Defendant Barbosa is a serial fraudster and appears to have an unlimited supply of leads,  
15 candidates and victims provided to her from the Defendant Los Angeles County Probate Department.

16 188. Defendant Barbosa is also the covert colleague of Attorney Andrew Rowe. They are the  
17 CEO (Barbosa) and Secretary (Rowe) of a corporation named Stepping Forward, Inc., that executed  
18 serial probate disgorgements.

19 189. Their relationship was exposed through an internal legal fight over the profits of the sale of  
20 a home for \$150,000 less than market value. At the time of the sale, Barbosa, who is not a licensed real  
21 estate agent, was serving as the conservator for a man named Edward Hill, who is a resident of  
22 Lawndale Nursing Home.

23 190. While serving in that capacity, she sold a property out from under the conservatee, Mr. Hill,  
24 to her **own business partner** Andrew Rowe, without disclosing the same to the Court.

25 191. The internal legal fight arose when Defendant Barbosa sued Attorney Rowe over the  
26 takings from Mr. Hill. Defendant Oronsaye served as Barbosa's attorney for a subsequent investigation  
27 into the matter which revealed that Mr. Hill's property was sold for at a loss of \$150,000.  
28



1 192. During this process, Defendant Barbosa was disgorging funds, and Rowe was billing for  
2 attorney fees. Barbosa never disclosed to the Court that she had sold the property to her business partner.

3 193. The LACPD is deeply involved in the illegal RICO enterprise described in this Complaint  
4 and is continuously feeding victims and leads to the unscrupulous Defendants, as set forth in this  
5 Complaint.

6 194. LACPD fed Barbosa the Hill lead, as well as the lead of the Gesner L. Martin Living Trust  
7 so that she, and the remaining defendants, could enrich themselves at the expense of vulnerable Los  
8 Angeles County residents like Plaintiff, Mr. Hill and Rex Martin. Defendants, by way of their unlawful  
9 RICO enterprise are preying on society.

10 195. Someone, or some individuals at the LACPD is/are feeding them leads and providing them  
11 with a plethora of victims to defraud, including Plaintiff.

12 196. All of these actions occurred and are continuing to occur as part of a pattern of racketeering  
13 and predicate criminal actions in furtherance of the Defendants' illegal RICO enterprise, in which the  
14 LACPD is involved.

15 197. Defendants Oronsaye, Aivazi, Alvarado, and Barbosa, like Jensen are all connected with the  
16 Los Angeles County Probate and investigation Department for purposes of violating the law in  
17 furtherance of the illegal RICO enterprise by defrauding Plaintiff and the Trust, as well as innumerable  
18 Los Angeles County estates and estate beneficiaries, yet to be discovered.

19 **198.** Defendant Oronsaye is also part of the LACPD network. He used to represent Barbosa,  
20 through which he held Plaintiff's case against Barbosa, mentioned herein, at bay for two years while  
21 disgorging landlord rents with Barbosa. Oronsaye stopped representing Barbosa after becoming the  
22 subject of a Bar Complaint regarding his activities in the enterprise described in this Complaint.

23 199. Each and every Defendant named in this lawsuit has participated in the illegal RICO  
24 enterprise in order to defraud and humiliate the Plaintiff, to drain the assets of the trust and to enrich  
25 themselves without any legal foundation for doing so. Defendants have harmed Plaintiff in his person  
26 and his reputation, have gone against the will of the Trust which he managed, and have defrauded and  
27 harmed the Trust.

28 .....

1 **PRELIMINARY STATEMENT OF ARGUMENT**

2 200. Under 18 U.S.C. § 1962 *et seq.*, a RICO enterprise is “any individual, partnership,  
3 corporation, association or other legal entity, and any union or group of individuals associated in fact  
4 although not a legal entity.”

5 201. The pattern of racketeering activity is most easily found in the pattern of bribery and  
6 extortion charges. A person who conducts, through a pattern of racketeering, directly or indirectly, the  
7 affairs of an enterprise with which he is associated and which affect interstate commerce, faces RICO  
8 conviction and possible forfeiture of his ill-gotten gains and interests.

9 202. The “enterprise” may be the court system. *United States v. Murphy*, 768 F.2d 1518, (7<sup>th</sup> Cir.  
10 1985), a judgeship, *United States v. Hunt*, 749 F.2d 1078 (4<sup>th</sup> Cir. 1978), a local prosecutor’s office,  
11 *United States v. Yonan*, 800 F.2d 164 (7<sup>th</sup> Cir. 1986), or a law firm *United States v. Yonan*, 800 F.2d 164  
12 (7<sup>th</sup> Cir. 1986).

13 203. A group of people, associated in fact, who agree to conduct the affairs of the  
14 court/enterprise through bribery of the judge can be prosecuted as a RICO conspiracy.

15 204. All Defendants have assisted in carrying out the predicate acts of the illegal RICO  
16 enterprise and the RICO predicate offenses committed by all Defendants include theft wire fraud, mail  
17 fraud and obstruction of justice.

18 205. All Defendants have conspired with and aided and abetted other defendants in furtherance  
19 of fraudulent schemes which proximately caused Plaintiff’s injuries and damages, as described herein.  
20 This aiding and abetting by the remaining RICO Defendants includes the following elements: (1)  
21 knowing about the underlying illegal RICO enterprise; and (2) rendering substantial assistance in the  
22 achievement and perpetuation of the illegal RICO enterprise.

23 206. Defendants have all been unjustly enriched by the illegal RICO Enterprise promulgated by  
24 the LACS, LACPD, the Administrative and Judicial Defendants, Defendant Jensen and the others.

25 207. As a direct and proximate result of all of the foregoing, Plaintiff has been damaged and will  
26 be damaged in an amount in excess of \$5 million.



**V. CAUSES OF ACTION**

**FIRST CLAIM FOR RELIEF**

**(Violations of Federal Civil RICO—Conduct of a RICO Enterprise  
18 U.S.C. § 1962(a) and 1964(c) by all Defendants)**

.....  
208. Plaintiff incorporates by reference all of the preceding paragraphs of this Complaint as if fully set forth herein.

209. Title 18 U.S.C. § 1962(a) provides, in part:

It shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity or through collection of an unlawful debt in which such person has participated as a principal within the meaning of section 2, title 18, United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in acquisition of any interest in, or the establishment or operation of, any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.

210. The elements of civil RICO are as follows: (1) conduct; (2) of an enterprise; (3) through a pattern (4) of racketeering activity, (5) resulting in injury.

211. A pattern of racketeering activity is established by specifying the “predicate acts” or violations of the underlying statute, that they were continuous, and that they violated interstate commerce. In this case the predicate acts, including mail fraud and wire fraud, as described herein were and are not only continuous, but they have every indication of continuing into the future, and they have affected interstate commerce.

212. In order for a plaintiff “to have standing to sue under §§ 1962(a) and 1964(c), he must have alleged that funds derived from the alleged racketeering activity . . . were used to injure him.” *Wagh v. Metris Direct, Inc.*, 348 F.3d 1109 (9<sup>th</sup> Cir. 2003). A Plaintiff does not have to “specifically allege a distinct investment injury.” *Id.* At all relevant times, each RICO Defendant was a “person” within the

1 meaning of 18 U.S.C. §§ 1961(3) and 1962(c). The RICO Defendants violated 18 U.S.C. § 1962(c) by  
2 the acts described in the paragraphs below.

3 213. At all relevant times, the illegal fraud scheme conceived and carried out by Defendant  
4 Jensen, by which she defrauded Plaintiff and the GLM Trust, constituted an “Enterprise” within the  
5 meaning of 18 U.S.C. §§ 1961(4) and 1962(c). The definition of “enterprise” encompasses both groups  
6 with a formal legal structure and those whose members merely associate in fact.  
7

8 214. The RICO Defendants, including Jessner, Slayton, the LACPD, and Defendants Chevron,  
9 Barbosa, Oronsaye, Alvarado and Aivazi directly assisted Defendants Jensen by engaging in illegal  
10 activities, as set forth herein, including fraud, and obstruction of justice, in furtherance of the illegal  
11 RICO enterprise.  
12

13 215. At all relevant times, these RICO Defendants were engaged in this illegal enterprise, within  
14 the meaning of RICO, and/or their activities affected, interstate commerce and/or foreign commerce  
15 within the meaning of 18 U.S.C. § 1962(c). At all relevant times, the remaining RICO Defendants held a  
16 position in or were otherwise affiliated with the illegal enterprise described herein.  
17

18 216. At all relevant times the RICO Defendants did knowingly, willfully, and unlawfully conduct  
19 or participate, directly or indirectly, in the conduct, management, or operation of the affairs of the  
20 enterprise for which Plaintiff has yet to be compensated.  
21

22 217. At all relevant times the RICO Defendants participated in the scheme or artifice knowingly,  
23 willfully, and with the specific intent to advance their scheme to deceive or defraud Plaintiff.  
24

25 218. The RICO Defendants have engaged in multiple predicate acts, including theft, wire fraud,  
26 mail fraud and obstruction of justice. The conduct of the RICO Defendant as described herein  
27 constitutes a pattern of racketeering activity within the meaning of 18 U.S.C. § 1961(5), as they are both  
28 continuous and related. *H.J. Inc. v. Nw. Bell Tel. Co.*, 492 U.S. 229, 239 (1989).



1 agree to defraud another through false representation or other wrongful conduct. *Applied Equipment*  
2 *Corp. v. Litton Saudi Arabia Ltd.*, 7 Cal. 4<sup>th</sup> 503, 511-12 (1994).

3 227. Defendant LACPD and Defendant Jensen conspired with Defendant Chevron to defraud the  
4 court and the trust and to obtain the Plaintiff Trust assets through misrepresentation and fraud. They had  
5 an agreement to deceive the Plaintiff and the Court in order to do so, and these defendants took steps  
6 toward achieving that goal.

7  
8 228. Defendant Jensen and Defendant Chevron deliberately misrepresented the nature of the Trust  
9 and its documentation to Defendant Nord in order to position themselves to become unlawful  
10 beneficiaries of the Trust. They did this by collusion, conspiracy and deliberate deceit.

11  
12 229. Defendants Aivazi and Oronsaye colluded and conspired to illegally profit through  
13 deception and fraud against the GLM Trust on or about May of 2020 via two landlord exploitation plots  
14 wherein their two clients, the Plaintiff's trust's tenants Alvarado and Barbosa, would wildly claim and  
15 then file frivolous and false habitability cross-complaints against unsuspecting and complaint landlords,  
16 including the Plaintiff.

17  
18 230. Defendants Alvarado and Barbosa, along with Aivazi and Oronsaye conspired to defraud  
19 the trust by making false claims regarding the habitability of the Trust properties which Alvarado and  
20 Barbosa rented from the Plaintiff Trust, in furtherance of the RICO extortion plots, as set forth herein.

21  
22 231. Defendants Alvarado and Barbosa along with Aivazi and Oronsaye, all of whom have  
23 criminal intent, have worked together by committing mail fraud, wire fraud and obstruction of justice in  
24 furtherance of the illegal enterprise in order to defraud the trust.

25  
26 232. Defendants Aivazi and Oronsaye unjustly enriched themselves in a for profit internal client  
27 referral relationship along with the LACPD to exploit landlords during the COVID-19 pandemic, by  
28 disgorging money from the pockets of unsuspecting estate beneficiaries.

1 233. Defendants Aivazi and Oronsaye are engaged in a hunting scheme to exploit vulnerable  
2 populations that include probate exposed family members of Los Angeles County. They use block  
3 billing for excessive and expensive hours as PVP attorneys or conservators appointed by the LACPD in  
4 order to rob the estates of unsuspecting estate beneficiary victims.

5 234. Aivazi and Oronsaye constantly plot using wire and e-mail fraud, as prohibited under RICO,  
6 in order to conceal and misrepresent the true nature of their conduct -- robbing the citizens, including  
7 Plaintiff.  
8

9 235. Defendants Aivazi, Jensen and Oronsaye, all of whom are attorneys, and all of whom have  
10 criminal intent, have been bribed, have bribed each other and/or have received unauthorized information,  
11 referrals and bribes from the Defendant LACPD in furtherance of the illegal activities of the enterprise -  
12 to wit, they have received leads on estates in Los Angeles County and have helped themselves to the  
13 control, assets and proceeds thereof by getting themselves appointed as Conservators, PVP attorneys and  
14 the like, and turning around and cheating, stealing and robbing the estates of unsuspecting Los Angeles  
15 citizens, including the Plaintiff, and others as will be set forth herein.  
16

17 236. All of the foregoing predicate acts were sanctioned and encouraged by the Administrative  
18 and Judicial Defendants.  
19

20 237. The pattern of racketeering activity which all of these Defendants engaged in consists of  
21 multiple predicate acts, as listed herein, which amount to or pose a threat of continued criminal activity.  
22 *H.J. Inc. v. Northwest Bell Tel. Co.*, 492 U.S. 229, 239 (1989).  
23

24 238. The enterprise, by way of all Defendants benefited financially from these related crimes.

25 239. The pattern of racketeering activity which Defendants engaged in, including wire fraud and  
26 mail fraud, bribery and others had an effect on interstate commerce.  
27  
28





1 248. Defendants LACPD, Jensen, Defendant Chevron, Aivazi, Oronsaye, Barbosa and Alvarado  
2 constantly plot using wire and e-mail fraud, as prohibited under RICO, in order to conceal and  
3 misrepresent the true nature of their conduct -- robbing the citizens of Los Angeles County, including  
4 Plaintiff.

5 249. The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
6 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
7 herein.  
8

9 250. As a direct and proximate result of the foregoing fraudulent conduct toward Plaintiff and the  
10 Court by all Defendants, Plaintiff has been damaged and will be damaged in an amount exceeding \$5  
11 million.  
12

13 **FOURTH CLAIM FOR RELIEF**  
14 **(Breach of Fiduciary Duty by the Administrative and Judicial Defendants**  
15 **as well as Defendants Jensen, Aivazi and Oronsaye)**

16 251. Plaintiff incorporates by reference all of the preceding paragraphs of this Complaint as if  
17 fully set forth herein.

18 252. Under California law, a fiduciary duty arises when one person is entrusted with the property  
19 or interests of another, and that person is obligated to act in the best interests of the other. *City of Hope*  
20 *National Medical Center v. Genentech, Inc.* 43 Cal. 4<sup>th</sup> 375, 386 (2008).

21 253. The Administrative and Judicial Defendants, including Defendant LACPD owe a fiduciary  
22 duty to all citizens of Los Angeles County, especially those who have, whether by legitimate or  
23 illegitimate means, come under its purview, including Plaintiff.  
24

25 254. The Administrative and Judicial Defendants breached that duty to Plaintiff by promulgating  
26 a corrupt system that unlawfully removed Plaintiff, the legitimate Trustee of his Mother's Living Trust,  
27  
28

1 appointed a corrupt PVP both as conservator to his brother Rex Martin's estate and later as Trustee of  
2 the GLM Trust, which breaches have directly and proximately injured the Plaintiff.

3 255. Defendant Jensen owed and/or owes a fiduciary duty to the Plaintiff.

4 256. Defendant Jensen breached that duty by conspiring to have Plaintiff removed as Trustee.

5 257. Despite this breach by Jensen, Plaintiff dutifully fulfilled all obligations designated to him  
6 as Trustee and fiduciary, in spite of Jensen and all remaining RICO Defendants' efforts to make it  
7 impossible for Plaintiff to do so.

8 258. Defendant Jensen failed to perform her duties and obligations as a fiduciary, and has instead  
9 stolen, converted, spent or otherwise fraudulently converted Trust assets to herself, to which she was not  
10 entitled, for her own purposes.

11 259. As a direct and proximate result of Defendant Jensen's breach of her fiduciary duty,  
12 Plaintiff has been damaged and will be damaged in an amount to be proven at trial.

13 260. Defendants Aivazi and Oronsaye also owe a fiduciary duty to the Plaintiff Trust. Both  
14 Defendants violated this duty when they conspired with their clients, Alvarado and Barbosa, to defraud  
15 the Plaintiff Trust.

16 261. The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
17 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
18 herein.

19 262. As a direct and proximate result of such breaches of fiduciary duty Plaintiff has been  
20 damaged and will be damaged in an amount to be proven at trial.

21  
22  
23  
24  
25 **FIFTH CLAIM FOR RELIEF**  
26 **(Civil Conspiracy by all Defendants)**

27 263. Plaintiff incorporates by reference all of the preceding paragraphs of this Complaint as if  
28 fully set forth herein.



1 239 F.3d 1376 (Fed. Cir. 2001); *Ashley v. Jones*, 225 Cal. App. 4<sup>th</sup> 773 (2014); *Wyatt v. Union Mortgage*  
2 *Co.*, 24 Cal. App. 4<sup>th</sup> 773 (1994).

3 272. The elements under California Civil Code § 1710 are: (1) the defendant represented to  
4 another that a fact was true; (2) the representation was actually false; (3) the defendant knew it was false;  
5 (4) the defendant intended for the other person to rely on the statement; (5) the other person did rely on  
6 the statement; (6) the other person was harmed by the reliance; or (7) the plaintiff's reliance on the  
7 defendant's representation was a substantial factor in causing the harm suffered.  
8

9 273. Defendant Jensen and Defendant Chevron deliberately provided false information Defendant  
10 Nord about the Plaintiff and the GLM trust, which resulted in an erroneous probate order and in  
11 substantial monetary damages to the Trust and its assets, and to the Plaintiff.  
12

13 274. Defendants Aivazi and Alvarado, Oronsaye and Barbosa, provided false information to the  
14 Los Angeles Housing Department with regard to their false Claims of Habitability against Plaintiff as  
15 their landlord.  
16

17 275. The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
18 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
19 herein.  
20

21 276. As a direct and proximate result of the acts and omissions as described herein, Plaintiff has  
22 been damaged and will be damaged in an amount in excess of \$5 million.  
23

24 **SEVENTH CLAIM FOR RELIEF**  
25 **(Unjust Enrichment by All Defendants)**  
26

27 277. Plaintiff fully incorporates by reference the preceding paragraphs of this Complaint as if  
28 fully set forth herein.

27 278. Cases dealing with unjust enrichment in California are uniform in their recognition of three  
28 elements of the claim: (1) that the defendant benefited; (2) at the plaintiff's expense; and (3)

1 that equity and good conscience require restitution. *Peterson v. Cellco Partnership*, 80 Ca. Rptr. 3d 316  
2 (Ct. App. 2008)

3 279. In reliance upon Defendant Jensen's lies and manipulation, Defendant Nord entered an  
4 Order divesting Plaintiff as Trustee.

5 280. Despite this, Plaintiff faithfully remained performing all of the responsibilities and fiduciary  
6 obligations of the Trustee for the benefit of the Trust.

7 281. The remaining Defendants aided and abetted Jensen in this fraud, in the manner described  
8 herein. Because of this all Defendants have been unjustly enriched at Plaintiff's expense.

9 282. The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
10 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
11 herein.  
12

13 283. As aiders and abettors to Defendant Jensen's illegal and fraudulent RICO enterprise, all  
14 Defendants have been materially enriched by defrauding the Court and the Plaintiff Trust, as set forth  
15 herein, for which Plaintiff and the Trust have received nothing of value or reimbursement for their  
16 injuries and losses. Therefore all Defendants have been materially enriched at the Plaintiff's expense.  
17

18 284. It is against equity and good conscience to permit the Defendants to retain what is sought to  
19 be recovered.  
20

21 285. As a direct and proximate result of the acts and omissions of all of the Defendants, as  
22 described herein, Plaintiff has been damaged and will be damaged in an amount to be proved at trial, but  
23 reasonably believed to be in excess of \$5 million.  
24

25 **EIGHTH CAUSE OF ACTION**  
26 **(Conversion by All Defendants)**

27 286. Plaintiff fully incorporates by reference the preceding paragraphs of this Complaint as if  
28 fully set forth herein.

1 287. California law defines conversion as “the wrongful exercise of dominion over the property  
2 of another.” The elements of a conversion claim are: (a) the plaintiff’s ownership or right to possession  
3 of the property; (b) the defendant’s conversion by a wrongful act or disposition of property rights; and (c)  
4 damages.” *Welco Electronics, Inc. v. Mora*, 223 Cal. App. 4<sup>th</sup> 202, 208 (2014).

5  
6 **288.** The tort of conversion is derived from the common law action of trover. The gravamen of  
7 the tort is the defendant’s hostile act of dominion or control over a specific chattel to which the plaintiff  
8 has their right of immediate possession.

9 **289.** Defendant LACPD exercised an unauthorized dominion of the Plaintiff as Trustee, and over  
10 the Trust itself to the alteration or to the exclusion of Plaintiff’s rights. It has prevented Plaintiff from  
11 performing his fiduciary duty as Trustee.

12  
13 **290.** Defendant Jensen and Defendant Chevron exercised an unauthorized dominion over the  
14 Trust to the alteration of its condition or to the exclusion of Plaintiff’s rights. They prevented Plaintiff  
15 from performing his fiduciary duties as Trustee.

16  
17 **291.** Defendants Alvarado and Barbosa exercised unauthorized dominion over the Trust to the  
18 alteration of its condition or to the exclusion of plaintiff’s rights. They retained funds that they owed to  
19 the Plaintiff Trust by virtue of their lease Agreements, and thereby converted funds to their own use.

20 **292.** All Defendants converted the Plaintiff’s assets for their own use by engaging in fraudulent  
21 and/or unlawful conduct in furtherance of the predicate acts of the illegal RICO enterprise, as described  
22 herein. *See Farmers Exchange v. Zerin*, 53 Cal. App. 3d 68 (1975).

23  
24 **293.** The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
25 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
26 herein.





1 the Trust by making false statements about Plaintiff and the Trust to the Court, which, by an unlawful  
2 Order, deprived Plaintiff of his duty, responsibility and authority to carry out the responsibilities of a  
3 Trustee, which duty was granted to him by his late Mother, and by the express terms of the Trust she  
4 created.

5           303. Defendants Jensen and Defendant Chevron lied about and humiliated Plaintiff and caused  
6 the Court to do likewise both during the hearing and in its March 2019 Order, as set forth herein.

7           304. Defendants Alvarado, Barbosa, and their accomplices Defendants Aivazi and Oronsaye  
8 humiliated the Plaintiff by filing false Notices to Abate on the properties they leased from Plaintiff when  
9 they themselves had breached their lease agreements by failing to maintain the properties in habitable  
10 order, and subsequently tried to blame their failures upon Plaintiff.

11           305. Their emails also falsely accused him of “harassment” and the like, knowing the same to be  
12 false.

13           306. These false Abatement cases, which Plaintiff was forced to defend, dragged on through the  
14 Courts, costing Plaintiff unnecessary time, energy, expense and emotional drain and harm.

15           307. As a proximate result of the extreme and outrageous conduct engaged in by Defendants,  
16 Plaintiff suffered humiliation, mental anguish and extreme emotional and physical distress.

17           308. In a civil case not arising from the breach of a contractual obligation, the jury may award  
18 punitive damages ‘where it is proven by clear and convincing evidence that the defendant has been  
19 guilty of oppression, fraud, or malice.’ (Civ. Code, § 3294, subd. (a).) ‘Malice’ is defined as intentional  
20 injury or ‘despicable conduct which is carried on by the defendant with a willful and conscious disregard  
21 of the rights or safety of others.’ (*Id.*, § 3294, subd. (c)(1).) ‘Oppression’ is defined as ‘despicable  
22 conduct that subjects a person to cruel and unjust hardship in conscious disregard of that person’s  
23 rights.’ (*Id.*, § 3294, subd. (c)(2).)” (*Roby v. McKesson Corp.* (2009) 47 Cal.4th 686, 712.)  
24  
25  
26  
27  
28



1 Anton R., United States Attorney Northern District of Illinois, and Raphaelson, Ira, Chief, Special  
2 Prosecutions Division Northern District of Illinois, p. 3.

3 316. Plaintiff believes and alleges that Defendants Jessner and Slayton are willful participants in  
4 the illegal RICO Enterprise which has injured the Plaintiff.

5 317. Plaintiff believes and alleges that the Defendant Judges are willful participants in the illegal  
6 RICO Enterprise which has injured the Plaintiff.

7 318. Plaintiff is not suing the Defendant Judges for any judicial acts, such as their general review  
8 of or for their decisions in the case. Plaintiff is suing the Defendant Judges for *ultra vires* acts that go  
9 beyond their legal jurisdiction in depriving Plaintiff of his constitutional rights and privileges as well as  
10 his rights as a litigant in his courtroom,  
11

12 319. Plaintiff believes and alleges that Defendant Nord was a willful participant engaged in a  
13 conspiracy with Defendants Jensen, LACPD and Defendant Chevron, in order to subvert the will of law  
14 and to injure and deprive Plaintiff of his rights.  
15

16 320. Plaintiff believes and alleges that the official act of conducting a *sua sponte* hearing in the  
17 probate case and entering an Order depriving Plaintiff and the Trust of due process, was the product of a  
18 corrupt conspiracy involving bribery of Defendant Nord.  
19

20 321. Plaintiff believes and alleges that all three Defendant Judges, as well as all of the  
21 Administrative Defendants are part of the illegal RICO enterprise which has injured him in his property  
22 and his person.  
23

24 322. Any immunity from suit which any of the Defendant Judges or Administrative Defendants  
25 may argue does not change the character of their actions nor that of their co-conspirators. In fact, their  
26 immunity is dependent on the challenged conduct being an official judicial act within his statutory  
27 jurisdiction, broadly construed. *Stump v. Sparkman*, 435 U.S. 349, 356 (1978).  
28

1           323. Private persons, such as Jensen and Defendant Chevron, jointly engaged with state officials,  
2 such as Defendant Nord, and others, are acting “under color” of law for purposes of § 1983 actions.  
3 *Adickes v. S.H. Kress Co.*, 398 U.S. 144, 152 (1970).

4           324. At all relevant times herein, the Defendant Judges were acting under color of state law. 42  
5 U.S.C. § 1983. Their decisions were the product of system-wide corruption of the LACPD, and were  
6 corruptly issued as a result of their willing participation in the illegal RICO Enterprise in which  
7 Defendants Jessner, Slayton, the LACPD, Jensen, Chevron and the remaining Defendants were and are  
8 willfully engaged.

9           325. Plaintiff Walter Martin, as Trustee, is being and has been deprived of his rights, privileges  
10 and immunities, including his rights to Due Process under the Fifth and Fourteenth Amendment to the  
11 United States Constitution by the acts and omissions of the three Defendant Judges, as described herein.

12           326. Defendant Nord failed and refused to acknowledge and rectify fraud committed by  
13 Defendant Jensen upon the Court as set forth herein. Defendants Morgan and Penny have only  
14 perpetuated the fraud committed by the Administrative Defendants, and Defendants Nord, Jensen and  
15 Chevron.

16           327. The doctrine of judicial immunity does not excuse the Defendant Judges from responding as  
17 a witness when his co-conspirators are sued, even though a charge of conspiracy and judicial corruption  
18 will be aired and decided. *Gravel v. United States*, 408 U.S. 606 (1972).

19           328. The United States Supreme Court stated: “[W]e agree . . . that the potential harm to the  
20 public from denying immunity to private co-conspirators is outweighed by the benefit of providing a  
21 remedy against those private persons who participate in subverting the judicial process and in so doing  
22 inflict injury upon other persons. *Dennis v. Sparks* 449 U.S. 24, 32 (1980).

1 329. Under *Sparks*, “a private defendant can act under color of state law if it is a willful  
2 participant in joint action with the State or its agents.” Thus each and all of the other private defendants  
3 who conspired to defraud and did defraud Defendant Nord are liable for the acts and omissions of  
4 Defendant Nord.

5 330. In addition to this, the LACPD, including Defendants Jessner and Slayton acted and are  
6 continuing to act under color of state law in their willful engagement in the illegal RICO enterprise  
7 along with Jensen, Defendant Chevon, Aivazi and Oronsaye to defraud the Plaintiff Trust.

8 331. All of these Defendants’ running of the illegal RICO enterprise, and their unconstitutional  
9 policy, practice and customs directly and proximately deprived Plaintiff of his rights under the 5<sup>th</sup> and  
10 14<sup>th</sup> Amendments to the United States Constitution.

11 332. The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
12 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
13 herein.

14 333. As a direct and proximate result of all of the foregoing, Plaintiff has been damaged and will  
15 be damaged in an amount in excess of \$5 million.

16  
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18  
19 **ELEVENTH CAUSE OF ACTION**  
20 **(Punitive Damages under Cal. Civil Code § 3294(c) against all Defendants)**

21 334. Plaintiff fully incorporates by reference the preceding paragraphs of this Complaint as if  
22 fully set forth herein.

23 335. The acts and omissions by all of the Defendants as set forth herein were willful and wanton  
24 and they harmed Plaintiff.

25 336. The acts and omissions by all Defendants were intentional and extremely reckless,  
26 malicious, oppressive and fraudulent.

27 337. California Civil Code 3294(c) defines “malice” “oppression” and “fraud.”  
28

1 338. Malice, under § 3294(c), means: “Conduct that is intended by the defendant to cause injury  
2 to the plaintiff, or despicable conduct carried on by the defendant with a willful and conscious disregard  
3 of the rights or safety of others.”

4 339. Plaintiff has established that all Defendants acted maliciously in injuring him, as described  
5 herein.

6 340. Oppression, under § 3294(c), means: “Despicable conduct that subjects a person to cruel  
7 and unjust hardship in conscious disregard of that person’s rights.”

8 341. Plaintiff has established that all Defendants subjected them to cruel and unjust hardship in  
9 conscious disregard of their rights, as described herein.

10 342. Fraud, under § 3294(c), means: “An intentional misrepresentation, deceit or concealment of  
11 a material fact known to the defendant . . . made with the intention on the part of the defendant thereby  
12 depriving a person of property or legal rights or otherwise causing injury.  
13

14 343. Plaintiff has established that all Defendants made material misrepresentations to, deceived  
15 and concealed material facts known to them and to the Court, or other agencies, with the intention of  
16 depriving Plaintiff of his property or legal rights, or otherwise causing Plaintiff injury.  
17

18 344. Plaintiff has established, and will establish at the trial of this matter, all of the foregoing by  
19 clear and convincing evidence.  
20

21 345. The Administrative and Judicial Defendants continue to promulgate, support, and encourage  
22 the illegal RICO enterprise and the fraudulent predicate acts of all of the other Defendants, as described  
23 herein.  
24

25 346. As a result of all Defendants’ acts and omissions, as described herein, Plaintiff is entitled to  
26 an award of punitive damages.  
27  
28



**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully request that the Court Order the following relief:

1. As to the First Cause of Action, award Plaintiff money damages pursuant to 18 U.S.C. § 1962(c), as well as treble damages plus costs, and any other relief provided by the statute for the violations of the RICO statutes by all Defendants;

2. Enter judgment against each of the RICO Defendants, jointly and severally, in an amount equal to three times the amount of damages to the Plaintiff has sustained because of the RICO Defendant's actions, plus a civil penalty for each violation under 18 U.S.C. § 1964 and § 1962;

3. As to the First Cause of Action enter an award against all Defendants of Restitution to Plaintiff of all money, property and benefits Plaintiff were unlawfully defrauded and deprived of by the RICO Defendant and Order the RICO Defendant to cease and desist from violating 18 U.S.C. § 1964;

4. As to the Second Cause of Action, award Plaintiff money damages caused by the conspiracy to commit fraud.

5. As to the Third Cause of Action, award Plaintiff money damages caused by the wire and mail fraud predicate acts committed by all Defendants.

6. As to the Fourth Cause of Action, award Plaintiff money damages for the breach of fiduciary duty by the Administrative Defendants, the Judicial Defendants and Defendants Jensen, Aivazi and Oronsaye;

7. As to the Fifth Cause of Action, award Plaintiff money damages for the Civil Conspiracy committed by all Defendants;

8. As to the Sixth Cause of Action, award Plaintiff money damages for the Fraudulent misrepresentation by the named Defendants to this Cause of Action.

1 9. As to the Seventh Cause of Action for the unjust enrichment, enter and Order for damages for  
2 Plaintiff to be paid jointly and severally by all Defendants;

3 10. As to the Eighth Cause of Action, award Plaintiff money damages for conversion of assets by the  
4 Administrative Defendants, the Judicial Defendants and Defendants Jensen, Chevron, Aivazi, Alvarado  
5 and Barbosa.

6 11. As to the Ninth Cause of Action, award Plaintiff money damages for the intentional infliction of  
7 emotional distress proximately caused to them by all Defendants;  
8

9 12. As to the Tenth Cause of Action, award Plaintiff money damages for violations under Title 42  
10 U.S.C. § 1983 to be paid jointly and severally by all named Defendants, as well as for declaratory relief  
11 as this Court deems appropriate and just; and  
12

13 13. As to the Eleventh Cause of Action, award Plaintiff punitive damages and costs of this action to  
14 be paid by all Defendants; and

15 14. Grant to Plaintiff such other and further relief as this Court may deem just and proper.

16 Dated: July 24th, 2023  
17 Torrance, California

18 *s/Walter Emmanuel Martin*  
19 Walter Emmanuel Martin,  
20 Plaintiff in Pro Per  
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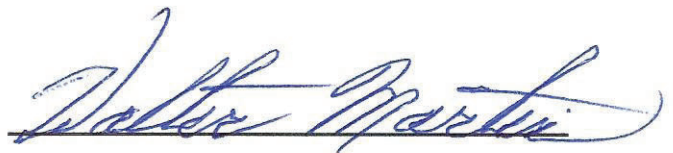
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**VERIFICATION OF PLAINTIFF**

I, Walter Emmanuel Martin, being duly sworn, hereby depose and say:

I am the Plaintiff in the above-entitled action. I have read the foregoing Amended Verified Complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to that matter, I believe them to be true.

To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are true.



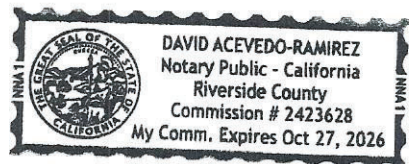
Walter Emmanuel Martin, in Pro Per

Sworn and subscribed before me this the 21<sup>th</sup> day of July, 2023



Notary Public:

My commission expires: Oct 27, 2026



**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Probate Division**

**Michael D. Antonovich Antelope Valley Dept. - A14**

**18AVPB00069**

**In re: Martin, Rex - Conservatorship**

**July 3, 2023**

**1:30 PM**

Honorable Stephen Morgan, Judge

Danette Dill, Judicial Assistant

Shawnda Dorn (#11387), Court Reporter

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**NATURE OF PROCEEDINGS:** Ex Parte - Application to Vacate Court Order filed on May 18, 2023 by Kenneth Ray Gaugh.

The following parties are present for the aforementioned proceeding:

Chevon Robinson, Petitioner  
Zevette Jones  
Walter Martin, Interested Party  
Emanuel Thomas, Attorney for Petitioner  
Kenneth Ray Gaugh, Attorney for Petitioner

The matter is called for hearing.

The Court has read and considered the moving papers.

The Court inquires of the parties and counsel.

The Court hears oral argument.

The Court finds that insufficient evidence has been provided to grant the matter on calendar this date based upon the reading of the moving papers and consideration of all presented evidence.

The Ex Parte - Application to Vacate Court Order filed on 5/18/2023 by Petitioner Kenneth Ray Gaugh is denied with prejudice.

The previous Court order of August 23, 2018 remains in full force and effect.

Future hearing date of August 31, 2023, will remain on calendar as previously scheduled.

Attorney Thomas may use the August 31st hearing date to file his Petition to appoint a temporary trustee.

The parties stipulate to attend a Mandatory Settlement Conference.

The Court appoints Tamila Jensen as the Court Appointed Counsel.

The Court sets a Mandatory Settlement Conference regarding (to be heard in A6) on July 31, 2023 at 9:00 AM.

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Probate Division**

**Michael D. Antonovich Antelope Valley Dept. - A14**

**18AVPB00069**

**In re: Martin, Rex - Conservatorship**

**July 3, 2023**

**1:30 PM**

The Court has ordered a Settlement Conference in this case to be held on July 31, 2023 at 9:00 am before Commissioner Alan Z. Yudkowsky in Department A06 of the Michael D. Antonovich Courthouse.

Counsel are provided with copies of Commissioner Yudkowsky's rules for Mandatory Settlement Conferences in open court.

The Court advises the parties that all appearances must be via LA CourtConnect on the July 31st hearing date.

EXHIBIT B

	<p><b>FILED</b>                  Superior Court of California                  County of Los Angeles</p> <p><b>JUL 03 2023</b></p> <p>David W. Stayton, Executive Officer/Clerk of Court                  By: D. Dill, Deputy</p>
<p><b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b></p>	
<p>In the Matter of:</p> <p><b>Martin, Rex - Conservatorship</b></p>	<p>CASE NUMBER</p> <p><b>18AVPB00069</b></p> <hr/> <p style="text-align: center;"><b>ORDER APPOINTING COUNSEL</b></p>

The Court on its own motion appoints Tamila Chris Jensen to act as counsel for Rex Martin.

Pursuant to Civil Code Section 56.10(b)(1) and 45 C.F.R. § 164.512(e)(1)(i) [the Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulation], the Court orders that counsel appointed herein shall have access to and authority to review and copy the medical records of Rex Martin.

Attorney's fees, if any, will be determined by the Court. Pursuant to Los Angeles County Superior Court Rules, Rule 4.127(b), court-appointed counsel will be awarded compensation at reduced hourly rates. By accepting this appointment, the attorney agrees that, on cases in which the Court has determined that the adult client or the client's estate, or a minor client's parent(s) or the minor's estate, has no ability to pay appointed counsel and the County of Los Angeles is ordered to pay for such services, appointed attorneys shall be compensated through the Professional Appointee Court Expense program (the "PACE" program). Compensation shall not exceed \$150 per hour.

The hourly rate for cases in which the Court determines that the adult client or the client's estate, or minor client's parent(s) or the minor's estate, has sufficient assets to pay, shall not exceed \$250 per hour except in cases involving unusual problems requiring extraordinary expertise.

7/3/2023

Date



Judge Brenda Penny, Judicial Officer



**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Probate Division**

**Michael D. Antonovich Antelope Valley Dept. - A14**

**18AVPB00069**

**In re: Martin, Rex - Conservatorship**

**July 10, 2023**

**9:20 AM**

Honorable Stephen Morgan, Judge

Danette Dill, Judicial Assistant

**NATURE OF PROCEEDINGS:** Non-Appearance Case Review

The following parties are present for the aforementioned proceeding:

No appearances.

Out of the presence of the court reporter, the Court makes the following findings and orders:

The Court finds that there is a conflict with previously Court Appointed Counsel Tamila Jensen.

Attorney Jensen is discharged.

The Court appoints Candace Jones as the Court Appointed Counsel.

Future hearing dates of July 31, 2023, and August 31, 2023 will remain on calendar as previously scheduled.

The Court orders the Clerk to give notice.

**CLERK’S CERTIFICATE OF MAILING/  
NOTICE OF ENTRY OF ORDER**

I, DAVID W. SLAYTON, Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Entry of the above minute order of July 10, 2023 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States Mail at the courthouse in Lancaster, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Dated: July 10, 2023

By: /s/ Danette Dill  
Danette Dill, Deputy Clerk



**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Probate Division**

**Michael D. Antonovich Antelope Valley Dept. - A14**

**18AVPB00069**

**In re: Martin, Rex - Conservatorship**

**July 10, 3032**

**9:20 AM**

LAW OFFICE OF TAMILA C. JENSEN  
15455 SAN FERNANDO MISSION BLVD.  
SUITE 202  
MISSION HILLS, CA 91345

Kenneth Gaugh, Esq.  
1963 W. Carson Street  
Torrance, CA 90501

Chevon Martin  
1615 Amargosa Drive  
Palmdale, CA 93551

CANDACE JONES  
43535 17TH ST W  
STE 403  
LANCASTER, CA 93534-5984

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Probate Division**

**Michael D. Antonovich Antelope Valley Dept. - A14**

**18AVPB00069**

**In re: Martin, Rex - Conservatorship**

**July 14, 3032**

**9:20 AM**

Honorable Stephen Morgan, Judge

Danette Dill, Judicial Assistant

**NATURE OF PROCEEDINGS:** Non-Appearance Case Review

The following parties are present for the aforementioned proceeding:

No appearances.

Out of the presence of the court reporter, the Court makes the following findings and orders:

The Court vacates it's order of July 10, 2023 appointing Candace Jones as Appointed Counsel.

Attorney Jones is discharged.

The Court appoints Pacione, Mario Andre, bar number 236363, as the Court Appointed Counsel.

The 07/31/2023 Mandatory Settlement Conference is advanced to this date and is continued to 08/04/23 at 01:30 p.m. in department A06.

Future hearing date of August 31, 2023 will remain on calendar as previously set.

The Court orders the Clerk to give notice.

**CLERK'S CERTIFICATE OF MAILING/  
NOTICE OF ENTRY OF ORDER**

I, DAVID W. SLAYTON, Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Entry of the above minute order of July 14, 2023 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States Mail at the courthouse in Lancaster, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

Dated: July 14, 2023

By: /s/ Danette Dill

Danette Dill, Deputy Clerk

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Probate Division**

**Michael D. Antonovich Antelope Valley Dept. - A14**

**18AVPB00069**

**In re: Martin, Rex - Conservatorship**

**July 14, 3032**

**9:20 AM**

Kenneth Gaugh, Esq.  
1963 W. Carson Street  
Torrance, CA 90501

Chevon Martin  
1615 Amargosa Drive  
Palmdale, CA 93551

CANDACE JONES  
43535 17TH ST W  
STE 403  
LANCASTER, CA 93534-5984

Mario Andre Pacione  
Pacione Law Firm  
38700 5th St. W  
Bldg B Ste F  
Palmdale, CA 93551-3996