

**ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
IN THE SUPREME COURT OF ILLINOIS**

RECEIVED

AUG 06 2019

U.S. ATTORNEY'S OFFICE
NORTHERN DISTRICT OF ILLINOIS

In the Matter of:)
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Supreme Court No:)
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Harry N. Arger
Rosa M. Tumialan
Christina Brunty
Todd Gale

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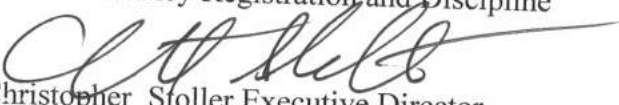
ATTY REG & DISC COMM
CHICAGO

TO:

Harry N. Arger
Rosa M. Tumialan
Christina Brunty
Todd Gale
Dykema Gossett PLLC
10 South Wacker Drive Suite 2300
Chicago, Illinois 60606

NOTICE OF FILING ATTORNEY DISBARMENT COMPLAINT

Christopher Stoller, Complainant files his Attorney Disbarment Complaint against the following Illinois Attorneys Harry N. Arger, Rosa M. Tumialan, Christina Brunty and Todd Gale with the Clerk of the Illinois Attorney Registration and Discipline Commission on August 6, 2019.


/s/Christopher Stoller Executive Director
Americans for the Enforcement of Attorney Ethics (AEAE)
P.O. Box 60645
Chicago, Illinois 60660
773-746--3163
email cns40@hotmail.com
www.rentamark.net

**ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
IN THE SUPREME COURT OF ILLINOIS**

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U.S. ATTORNEY'S OFFICE
NORTHERN DISTRICT OF ILLINOIS

No. Rouds

Supreme Court No:

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ATTY REG & DISC COMM
CHICAGO

In the Matter of:

Harry N. Arger
Rosa M. Tumialan
Christina Brunty
Todd Gale
Joseph J. Tirello Jr

ATTORNEY DISBARMENT COMPALINT

The Respondents Harry N. Arger, Rosa M. Tumialan, Christina Brunty,

Todd Gale and Joseph J. Triello Jr., are charged with violating ARDC Rules 3.3(a) and 8.4 (c) & (d).

The Attorney Registration and Disciplinary Commission was established by the Illinois Supreme Court to deal with issues of professional misconduct of attorneys. The serious allegations of **professional misconduct** that the Complainant has raised regarding the Respondents are issues that must be resolved the the ARDC. The issues of professional Attorney misconduct raised by the Complainant in this complaint are issues that the Commission is solely empowered to act upon under the Illinois Rules of Professional Misconduct.

COMES NOW, Complaint Christopher Stoller and hereby moves this Commission for investigation of possible professional misconduct, perjury, based on the evidentiary record supplied herein and the perjurious declaration by Arizona Attorney Joseph J. Tirello Jr., filed in this court on July 17, 2017,(Exhibit B) and subornation of perjury by Chicago Attorneys Harry H. Arger, Rosa M. Tumialan, Christina Brunty and Todd Gale s (“Respondents”)(Exhibit A Appearances) who drafted and filed the alleged perjurious Declaration of Mr. Tirello on July 17, 2019 (“Exhibit B).

The serious allegations of perjury and subornation of perjury grow out of a fraudulent civil eviction action initial filed unlawfully filed in the State Court of Arizona. By Arizona Attorney Joseph J. Tirello Jr., on behalf of Wilmington Trust and a fraudulent pleading filed in this court entitled Motion to Remand for Sanctions and Other Relief (Doc 14 18 cv-01821 Northern District of Illinois) incorporated herein by reference as if fully copied and attached.

The named Defendant, Philip Stone, in Federal District Court Case No. 18 cv-01821 whose rights have inured to Christopher Stoller, through an Assignment of Claims, and causes action (“Exhibit 2”) in and to the subject property, known as 28437 N. 112th Way, Scottsdale, AZ. Christopher Stoller, 70, a disabled person as defined by the Americans for Disability Act (ADA) and Michael Stoller¹, 27, a disabled person, a protected person as defined by the Americans for Disability Act, who is the sole owner of the subject property and holds a Warranty Deed clear and free of any mortgage or liens which is marked as (“Exhibit 3”).

The debts of Phillip Stone a New Mexico Resident, Stoller’s predecessor in interest in the property, were discharged in bankruptcy (“Exhibit 4”), and the Respondents have violated the discharge injunction 11 U.S.C. § 524(a)(2). Plaintiff sent out an unlawful debt

¹ Michael Stoller has assigned to Christopher Stoller, under the Law of Assignments of Causes of Action insofar as permitted by law, forever, any and all causes of action, remedies or claims now or in the future, that Assignor Michael Stoller have against any party, not limited to financial institutions, contractors, builders and their employees, affiliates, successors and assigns.

collection letter, unlawfully using the mails,² "Notice to Vacate" to Philip Stone marked as (Exhibit 5"). (Violation of 8.4 (c) & (d). The Respondents knew that Philip Stone³, a former owner of the subject property, did not own nor occupy the subject property since September 19, 2008, when Mr. Stone moved to New Mexico. Plaintiff's violated the discharge injunction in that Wilmington Trust when they filed their fraudulent Forcible Entry and Detainer lawsuit against a non-party, Philip Stone, in order to avoid diversity, and to deprive the lawful owner, Christopher Stoller and Michael Stoller of the subject property from removing the case to Federal Court.

There is irrefutable evidence that counsel, **Joseph Triello Jr.**, for Wilmington Trust, committed perjury, when he signed the Forcible Entry and Detainer lawsuit on 30th day of October, 2018. **Exhibit 5 as well known to the Respondents** Harry H. Arger, Rosa M. Tumialan, Christina Brunty, Todd Gale and **Joseph Triello Jr.**

In the first paragraph of the Defendants' suit (Exhibit 6) it falsely states that **"Defendants are residents of Maricopa County, Arizona.** Attorney Joseph Triello Jr., knew that this was a false statement. Philip Stone is a resident of New Mexico and has not occupied the subject property in 10 years⁴. Joseph Triello was advised who the true names of the owners

² 940. 18 U.S.C. Section 1341 Wilmington Trust said letter met the two elements in mail fraud: (1) Wilmington Trust having devised or intending to devise a scheme to defraud (or to perform specified fraudulent acts), and (2) Wilmington Trust use of the mail for the purpose of executing, or attempting to execute, the scheme (or specified fraudulent acts)." *Schmuck v. United States*, 489 U.S. 705, 721 n. 10 (1989); see also *Pereira v. United States*, 347 U.S. 1, 8 (1954) ("The elements of the offense of mail fraud under . . . § 1341 are (1) a scheme to defraud, and (2) the mailing of a letter, etc., for the purpose of executing the scheme."); Laura A. Eilers & Harvey B. Silikovitz, *Mail and Wire Fraud*, 31 Am. Crim. L. Rev. 703, 704 (1994) (cases cited).

³ Email Chain as between Christopher Stoller and Plaintiff's attorney prior to Wilmington Trust filing their fraudulent forcible detainer law suit CV 2018-013457 on Oct 30, 2018 under penalty of perjury. Attorney Joseph J. Tirello Jr., committed perjury 18 U.S. Code § 1621 - Perjury when he signed the fraudulent detainer lawsuit. See affidavit of Christopher Stoller

⁴ Christopher Stoller informed Joseph Triello giving him actual notice that Philip Stone had moved out of the said property, 10 years earlier. Mr. Triello was informed that Michael Stoller was the owner. Christopher Stoller informed Mr. Triello that if he intends to sue to put the names of Christopher Stoller and Michael Stoller into the complaint. Mr. Triello intentionally placed Philip Stone, a now party, as defendant in his Forcible Detainer lawsuit in order to

of the subject property were. (See email communications as between Mr Triello and Christopher Stoller Exhibit) Please refer to the email chain of communication as between Christopher Stoller and Joseph Triello prior to Mr. Triello filing suit on October 30, 2018. See below true and correct copies of paragraph 1 of the fraudulent Forcible Entry and Detainer. See also a true and correct copy of the signature of attorney Joseph Triello under penalty of perjury on page 4 of the Forcible Entry complaint **Exhibit 6**.

Respondents Harry N. Arger, Rosa M. Tumialan, Christina Brunty ,Todd Gale and **Joseph Triello Jr.** knew or should have known that the Eviction Lawsuit (**Exhibit 6**) filed by Joseph Triello contained a perjured statement, yet Mr. Arger,, Ms. Tumialan with the endorsement and ratification of Respondents of Christina Brunty and Todd Gale and **Joseph Triello Jr.** filed a fraudulent Motion for Removal (Doc 14 Illinois Northern District , Case No. 18-cv-01821) incorporated herein by reference, enforcing the perjury of Joseph Triello before the court in the Northern District of Illinois. Ergo, the need for this Commission to investigate Joseph Triello , Harry N. Arger, Rosa M. Tumialan Christina Brunty and Todd Gale and for professional misconduct ..

The following is an exact reproduction of the complaint lines 19 through 25 which establish a prima facie and irrefutable evidence of Mr. Triello's perjury before this Commission. Mr. Tirello stated that all of the "Defendants (i.e. Philip Stone) were residents of Maricopa County Arizona" in the fraudulent Arizona Eviction lawsuit (**Exhibit 6**).. That this was a false statement given under oath as well known to Mr. Harry N. Arger, Rosa M. Tumialan Christina Brunty , Todd Gale and **Joseph Triello Jr.**.

First of all, Mr. Triello knew that Philip Stone was not a resident of Maricopa County Arizona, and the subject property. Secondly, Mr. Triello knew that Philip Stone was not a

avoid diversity and to prevent the correct parties Defendants from being named in the suit in clear violation of the THE FRAUDULENT JOINER PREVENTION ACT OF 2016 (FJPA). Mr. Triello fraud was willfully and deliberate fraud.

resident at the subject property when he filed the fraudulent eviction lawsuit **Exhibit 6** as well known to Mr. Harry N. Arger, Rosa M. Tumialan, Christina Brunty and Todd Gale who have engaged in witness tampering, and obstruction of justice. See a true and correct reproduction of the Arizona Eviction Lawsuit below which provides clear judicial evidence for the perjury of Joseph Triello. When he falsely states under oath that **“Defendants are all residents of Maricopa County Arizona.”** The defendants were **NOT** all residents of Maricopa County Arizona. That is evidence of perjury!

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**YOU ARE BEING SUED TO BE EVICTED FROM THE RESIDENCE.
PLEASE READ CAREFULLY.**

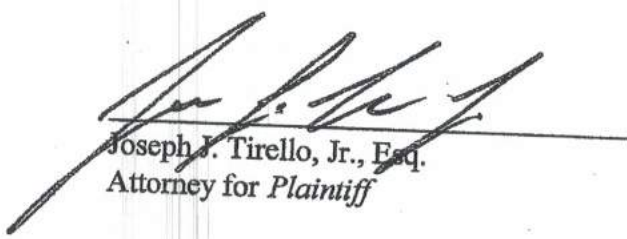
Wilmington Trust, National Association, not in its individual capacity but as Trustee of ARLP Securitization Trust Series 2014-2, as Plaintiff in this action for its Complaint alleges as follows:

1. Plaintiff is authorized to bring this action in Arizona. The Defendants are all residents of Maricopa County, Arizona. The real property (the “Property”) that is the subject

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H. For such other and further relief as the Court deems just and equitable.
I declare under penalty of perjury that the foregoing is true and correct.
DATED this 30th day of October 2018.

ZIEVE, BRODNAX & STEELE, LLP


Joseph J. Tirello, Jr., Esq.
Attorney for Plaintiff

Harry N. Anger charged with sorboration of perjury, witness tempering, obstruction of justice



Rosa Tumialan charged with sorboration, witness tempering obstruction of Justice

Aiding and abetting



DYKEMA GOSSETT ATTORNEYS HARRY N. ARGER AND ROSA M. TUMIALAN ARE CHARGED WITH PROFESSIONAL MISCONDUCT, SORBORNATION OF PERJURY, WITNESS TEMPERING AND OBSTRUCTION OF JUSTICE

Plaintiff's Wilmington Trust Corporation, not in its individual capacity but as Trustee of ALRP Securitization Trust, Series 2014-2 ("ALRP") a defunct trust. See a true and correct copy of a certificate of Revocation.

KENTUCKY SECRETARY OF STATE
P.O. BOX 718
FRANKFORT, KY 40602



First Class Mail
US Postage Paid
Frankfort, KY
Permit No. 888

Certificate of Revocation

I, Alison Lundergan Grimes, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

IMPORTANT NOTICE

**ARLP SECURITIZATION TRUST,
SERIES 2014-2**

did not file its 2016 annual report within sixty days after it was due. Accordingly, the Secretary of State revoked the Business Trust's authority to transact business in Kentucky on October 1, 2016.

**ARLP SECURITIZATION TRUST, SERIES
2014-2
C/O ALTISOURCE ASSET MANAGEMENT
CORPORATION
402 STRAND ST.
FREDERIKSTED VI 00840-3531**



Alison Lundergan Grimes
Alison Lundergan Grimes
Secretary of State

HARRY N. ARGER AND ROSA M. TUMIALAN endorsed and ratified by Christina Brunty and Todd Gale filed a fraudulent pleading before in Northern District of Illinois Case

No. 18 cv 01821 entitled **Motion to Remand, for Sanctions and other relief** (Doc 14) incorporated herein by reference.: See a true and correct reproduction of the first two paragraphs of the Respondents false pleading.

MOTION TO REMAND, FOR SANCTIONS AND OTHER RELIEF

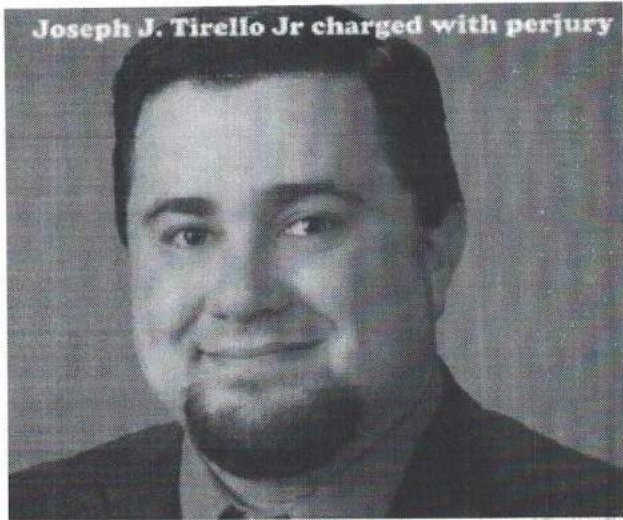
NOW COMES plaintiff, WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT AS TRUSTEE OF ALRP SECURITIZATION TRUST, SERIES 2014-2 (“ALRP Trust”) by and through its attorneys and under 28 U.S.C. § 1447(c) moves for an order remanding this matter to the Superior Court of the State of Arizona in and for the County of Maricopa. ALRP Trust states as follows in support of its motion.

INTRODUCTION

ALRP Trust is the plaintiff in a forcible entry and detainer case pending in the Superior Court of the State of Arizona in and for the County of Maricopa under case number 18-13457. The forcible complaint was filed in Maricopa County on October 30, 2018. Philip B. Stone was named as a defendant along with unnamed occupants and parties in possession. The Arizona eviction case has been held in abeyance since the fall of 2018 because of two purported removals to federal court in Chicago, Illinois. See Declaration of Joseph Tirello, Jr., attached as **Exhibit A** at ¶ 18.

The respondents are aiding and abetting Wilmington Trust Corporation’s fraud when they confirm the damning admission that “Philip B. Stone was named as a defendant, when the respondents and their client Wilmington Trust Corporation know that Mr. Philip Stone did not

own the subject property and did not live at the subject property since 2009 yet they intentionally named a non-party to avoid diversity jurisdiction and to avoid naming the correct party Christopher Stoller and/or Michael Stoller. See attached Emails (Exhibit 7 to Wilmington Trust Corporations' Arizona lawyers and Mr. Joseph J. Tirello Jr.)



Wilmington Trust Corporation attorneys Harry N. Arger and Rosa M. Tumialan drafted and filed a declaration endorsed and ratified by Christina Brunty and Todd signed by Arizona Attorney Joseph J. Tirello Jr., which contained perjured statements as well known to Respondents Attorneys Harry N. Arger, Rosa M. Tumialan, Christina Brunty and Todd Gale and **Joseph Triello Jr.** See a true and accurate reproduction of the perjured declaration (Doc 14 page 10) of Joseph J. Tirello.

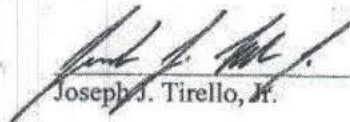
DECLARATION OF JOSEPH J. TIRELLO, JR.

I, Joseph Tirello, Jr., hereby declare as follows:

1. I am an attorney licensed to practice in the State of Arizona. I am a member of the firm Zieve, Brodnax & Steele, LLP. This declaration is based on my personal knowledge as the attorney of record for Wilmington Trust National Association, Not In Its Individual Capacity, But as Trustee of ALRP Securitization Trust, Series 2014-2. If called and sworn as a witness, I could and would testify competently thereto.
2. I am counsel of record for Wilmington in an eviction case filed in Maricopa County, Arizona pending under case number CV2018-013457.
3. The eviction case relates to property that is located in Maricopa County, commonly known as 28437 N. 112th Way, Scottsdale, Arizona (the "Property"). Wilmington is the holder of a note secured by a deed of trust that was recorded against the Property.
4. The note went into the default and a non-judicial foreclosure proceeded in accordance with Arizona law.
5. The eviction action was filed on October 30, 2018.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of July 2019.



Joseph J. Tirello, Jr.

Paragraph 3: "Wilmington is the holder of a note secured by a deed of trust that was recorded against the property." This is a perjured statement. Wilmington is not the holder of any valid Note that was recorded against the property." No Note was attached to the eviction

lawsuit. They do not have any valid Assignment of any original Note with by an Officer of Countrywide Bank to Wilmington Trust. This fact is well known to Joseph J. Tirello Jr., Harry N. Arger, Rosa M. Tumialan Christina Brunty and Todd Gale .

Paragraph 4: "The note went into default and a non-judicial foreclosure proceeded." This is a false and perjurious. Wilmington Trust never had an original assignment of the Note from Country Wide Bank. The judicial foreclosure was a fraud, Christopher Stoller, as Sole Trustee, conducted a prior Trustee Sale which foreclosed Wilmington Trust's interest in the property as well known to Wilmington Trust, Joseph J. Tirello Jr., Harry N. Arger and Rosa M. Tumialan.

FACTUAL BACKGROUND

1. Plaintiff Christopher Stoller, purchased property known as 28437 N. 112th Way, Scottsdale, AZ from Philip Stone who Quit Claimed his interest to Christopher Stoller Pension and Profit Sharing Plan Limited (CPPSP) on September 19, 2008. This was recorded in the Maricopa County Recorder's Office on September 22, 2008, under 2008-0815422.
2. On September 19, 2008, Philip Stone transferred and conveyed to CSPPS, a Bahamas Corporation and/or Christopher Stoller and Leo Stoller (collectively Assignees) under the Law of Assignments of Causes of Action insofar as permitted by law, forever, any and all causes of action, remedies or claims now or in the future, that Assignor CSPPSP have against any party, not limited to financial institutions, contractors, builders and their employees, affiliates, successors and assigns, et al., as well as the right to prosecute such causes of action in the name of the Assignor or Assignees or any of them and the right to settle or otherwise resolve such causes of action as Assignees sees fit, regarding the following real property in Maricopa County, State of Arizona:

Lot 3, Pinnacle Foothills, according to Book 398 of Maps, Page 50, and Affidavit of Correction recorded in Document No: 96-0145582, records of Maricopa County, Arizona. Assessor's Parcel Number: 216-74-044.

Commonly known as: 28437 N. 112th Way, Scottsdale, Arizona 85262.

Notice(s) of Lis Pendens were filed by Christopher Stoller on the subject real estate on December 29, 2008 under No: 2008-1090943 with the Maricopa County Recorder's Office and another Lis Pendens filed on December 2, 2013 under No: 20131025435.

The Christopher Stoller and Michael Stollers do not owe any delinquency payments, nor did Philip Stone owe any unpaid principle balances on said property. All of Philip Stone's debts were discharged in his Bankruptcy ("**Exhibit 4**"). This fact is well known to Joseph J. Tirello Jr., Harry N. Arger, Rosa M. Tumialan Christina Brunty and Todd Gale ., yet they were still attempting to collect on debts which violates the Federal Debt Collection Act and the Illinois Consumer Fraud Act.

3. Philip Stone's Promissory Note secured by a Deed of Trust and the Adjustable Rate Note together was cancelled as a result of the United States Bankruptcy Code 10-11558-17. Christopher Stoller filed a full release and full re-conveyance of said Deed of Trust and all other debts in connection with same including the Adjustable Rate Note secured by the Deed of Trust was filed with the Maricopa County Recorder's Office on August 1, 2014, under no: 2014-0512240 ("**Exhibit 4**").

5. The evidence is clear and convincing that the Arizona eviction law suit filed on October 30, 2018, represented a fraud on the court and contained the perjured statement of Attorney Joseph J. Tirello Jr., when he stated under oath that all of the defendants were residents of Maricopa County. The Commission has jurisdiction over Attorneys are Illinois Attorneys or Attorneys who come into the State of Illinois who are guilty of professional misconduct, committing perjury, subornation of perjury and fraud on the court. (Rule 3.3(a))



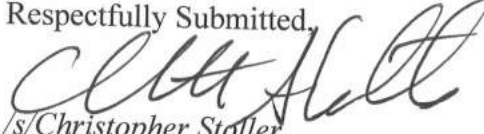
6. Attorney Joseph J. Tirello Jr., perjury was more conclusive, when Jon Burges made a simple six word denial contained in an interrogatory in a civil case “denying torturing prisoners into making confessions”. Mr. Burges was charged and convicted of perjury⁵. Mr. Burges was sent to Federal Prison for 5 years. The filing of the Arizona Eviction Lawsuit by Attorney Joseph J. Tirello and the drafting and filing of the Tirello Declaration (Doc 14, Page 10) by Harry N. Arger and Rosa M. Tumialan affirmatively establishes probably cause that professional misconduct, perjury and subornation of perjury has been committed in this case demanding that the Commission open an investigation into the misconduct of attorney(s) Harry N. Arger , Rosa M. Tumialan Joseph J. Tirello Jr., Christina Brunty and Todd Gale .

WHEREFORE, Complainant prays that the Inquiry Board immediately assign this matter to a hearing, panel, that a date for hearing be immediately set, that the hearing be conducted and that the panel make findings of fact, conclusions of law and a recommendation for such discipline as is warranted by its findings.

That the ARDC issue an order to suspend) Harry N. Arger , Rosa M. Tumialan Joseph J. Tirello Jr., Christina Brunty and Todd Gale from the practice of law pending its investigation.

⁵ https://www.democracynow.org/2010/6/29/jury_convicts_chicago_police_commander_jon

Respectfully Submitted,



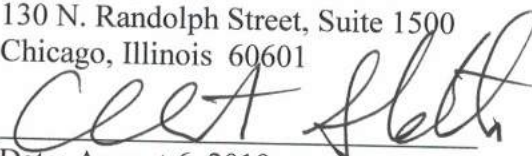
/s/Christopher Stoller

Christopher Stoller
415 Wesley Suite 1
Oak Park, Illinois 60302
(773) 746-3163
Cns40@hotmail.com

Certificate of Mailing

I hereby certify that this motion is being deposited with the U.S. Postal Service as first Class mail in an envelope addressed to:

Illinois Attorney Registration
and Disciplinary Commission
130 N. Randolph Street, Suite 1500
Chicago, Illinois 60601



Christopher Stoller

Date: August 6, 2019

EXHIBIT A

**U.S. District Court for the Northern District Of Illinois
Attorney Appearance Form**

Case Title: Wilmington Trust v. Philip B. Case Number: 1:19-cv-1821
Stone, et al.

An appearance is hereby filed by the undersigned as attorney for:
Wilmington Trust, National Association, not in its individual capacity but as Trustee of
ALRP Securitization Trust, Series 2014-2

Attorney name (type or print): Rosa M. Tumialán

Firm: Dykema Gossett PLLC

Street address: 10 S. Wacker Drive, Suite 2300

City/State/Zip: Chicago, IL 60606

Bar ID Number: 6226267
(See item 3 in instructions)

Telephone Number: (312) 627-2139

Email Address: rtumialan@dykema.com

Are you acting as lead counsel in this case? Yes No

Are you acting as local counsel in this case? Yes No

Are you a member of the court's trial bar? Yes No

If this case reaches trial, will you act as the trial attorney? Yes No

If this is a criminal case, check your status. Retained Counsel
 Appointed Counsel
If appointed counsel, are you a
 Federal Defender
 CJA Panel Attorney

In order to appear before this Court an attorney must either be a member in good standing of this Court's general bar or be granted leave to appear *pro hac vice* as provided for by local rules 83.12 through 83.14. I declare under penalty of perjury that the foregoing is true and correct. Under 28 U.S.C. §1746, this statement under perjury has the same force and effect as a sworn statement made under oath.

Executed on July 17, 2019

Attorney signature: S/ Rosa M. Tumialán
(Use electronic signature if the appearance form is filed electronically.)

**U.S. District Court for the Northern District Of Illinois
Attorney Appearance Form**

Case Title: Christoher Stoller v. Altisource Residential L.P., et al. Case Number: 1:18-cv-07169

An appearance is hereby filed by the undersigned as attorney for:
Wilmington Trust as Trustee of ARLP Securitization Trust Series 2014-2

Attorney name (type or print): Harry N. Arger

Firm: Dykema Gossett PLLC

Street address: 10 S. Wacker Drive, Suite 2300

City/State/Zip: Chicago, IL 60606

Bar ID Number: 6198806
(See item 3 in instructions)

Telephone Number: 312-627-2139

Email Address: harger@dykema.com

Are you acting as lead counsel in this case? Yes No

Are you acting as local counsel in this case? Yes No

Are you a member of the court's trial bar? Yes No

If this case reaches trial, will you act as the trial attorney? Yes No

If this is a criminal case, check your status. Retained Counsel
 Appointed Counsel
If appointed counsel, are you a
 Federal Defender
 CJA Panel Attorney

In order to appear before this Court an attorney must either be a member in good standing of this Court's general bar or be granted leave to appear *pro hac vice* as provided for by local rules 83.12 through 83.14. I declare under penalty of perjury that the foregoing is true and correct. Under 28 U.S.C. §1746, this statement under perjury has the same force and effect as a sworn statement made under oath.

Executed on July 30, 2019

Attorney signature: S/ Harry N. Arger
(Use electronic signature if the appearance form is filed electronically.)

**U.S. District Court for the Northern District Of Illinois
Attorney Appearance Form**

Case Title: Stoller v. Altisource Residential, L.P., et al. Case Number: 18 cv 07169

An appearance is hereby filed by the undersigned as attorney for:
Altisource Portfolio Solutions, Inc. and Ocwen Financial Corporation

Attorney name (type or print): Todd Gale

Firm: Dykema Gossett PLLC

Street address: 10 South Wacker Drive, Suite 2300

City/State/Zip: Chicago, IL 60606

Bar ID Number: 6229288
(See item 3 in instructions)

Telephone Number: (312) 627-2173

Email Address: tgale@dykema.com

Are you acting as lead counsel in this case? Yes No

Are you acting as local counsel in this case? Yes No

Are you a member of the court's trial bar? Yes No

If this case reaches trial, will you act as the trial attorney? Yes No

If this is a criminal case, check your status.
 Retained Counsel
 Appointed Counsel
If appointed counsel, are you
 Federal Defender
 CJA Panel Attorney

In order to appear before this Court an attorney must either be a member in good standing of this Court's general bar or be granted leave to appear *pro hac vice* as provided for by local rules 83.12 through 83.14. I declare under penalty of perjury that the foregoing is true and correct. Under 28 U.S.C. §1746, this statement under perjury has the same force and effect as a sworn statement made under oath.

Executed on July 30, 2019

Attorney signature: S/ Todd Gale
(Use electronic signature if the appearance form is filed electronically.)

**U.S. District Court for the Northern District Of Illinois
Attorney Appearance Form**

Case Title: Stoller v. Altisource Residential, L.P., et al. Case Number: 18 cv 07169

An appearance is hereby filed by the undersigned as attorney for:
Altisource Portfolio Solutions, Inc. and Ocwen Financial Corporation

Attorney name (type or print): Christina Brunty

Firm: Dykema Gossett PLLC

Street address: 10 South Wacker Drive, Suite 2300

City/State/Zip: Chicago, IL 60606

Bar ID Number: 6323688
(See item 3 in instructions)

Telephone Number: (312) 627-2173

Email Address: cbrunty@dykema.com

Are you acting as lead counsel in this case? Yes No

Are you acting as local counsel in this case? Yes No

Are you a member of the court's trial bar? Yes No

If this case reaches trial, will you act as the trial attorney? Yes No

If this is a criminal case, check your status.
 Retained Counsel
 Appointed Counsel
If appointed counsel, are you
 Federal Defender
 CJA Panel Attorney

In order to appear before this Court an attorney must either be a member in good standing of this Court's general bar or be granted leave to appear *pro hac vice* as provided for by local rules 83.12 through 83.14. I declare under penalty of perjury that the foregoing is true and correct. Under 28 U.S.C. §1746, this statement under perjury has the same force and effect as a sworn statement made under oath.

Executed on July 30, 2019

Attorney signature: S/ Christina Brunty
(Use electronic signature if the appearance form is filed electronically.)

EXHIBIT B

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILMINGTON TRUST, NATIONAL
ASSOCIATION, NOT IN ITS INDIVIDUAL
CAPACITY BUT AS TRUSTEE OF ALRP
SECURITIZATION TRUST, SERIES 2014-2

Plaintiff,

v.

PHILIP B. STONE, OCCUPANTS AND
PARTIES IN POSSESSION, CHRISTOPHER
STOLLER, ASSIGNEE, MICHAEL
STOLLER,

Defendants.

1-19-1821

Judge Elaine Bucklo

DECLARATION OF JOSEPH J. TIRELLO, JR.

I, Joseph Tirello, Jr., hereby declare as follows:

1. I am an attorney licensed to practice in the State of Arizona. I am a member of the firm Zieve, Brodnax & Steele, LLP. This declaration is based on my personal knowledge as the attorney of record for Wilmington Trust National Association, Not In Its Individual Capacity, But as Trustee of ALRP Securitization Trust, Series 2014-2. If called and sworn as a witness, I could and would testify competently thereto.
2. I am counsel of record for Wilmington in an eviction case filed in Maricopa County, Arizona pending under case number CV2018-013457.
3. The eviction case relates to property that is located in Maricopa County, commonly known as 28437 N. 112th Way, Scottsdale, Arizona (the "Property"). Wilmington is the holder of a note secured by a deed of trust that was recorded against the Property.
4. The note went into the default and a non-judicial foreclosure proceeded in accordance with Arizona law.
5. The eviction action was filed on October 30, 2018.

6. Christopher Stoller ("Stoller"), who claims an interest in the Arizona property, attempted to remove the eviction action to Illinois federal court on November 2, 2018.

7. The first petition was dismissed for want of prosecution in March 2019

8. Stoller refiled his removal petition on March 15, 2019.

9. I was unaware of this refiled petition until March 19, 2019.

10. I reviewed a letter issued by the Northern District of Illinois on March 18, 2019. I did not receive this letter when it was sent and only saw it when it was provided to me by Illinois counsel that is responding to the refiled removal petition.

11. I reviewed a transcript from a hearing conducted on June 10, 2019 in which it was represented that I had a meet and confer with Stoller at the conclusion of which I entered into an agreement relating to case scheduling.

12. I had no such meet and confer and entered into no such agreement with Stoller at any time.

13. I reviewed an order entered on June 10, 2019 which purported to adopt what was represented as an agreed case management schedule.

14. I am not authorized to practice law in the State of Illinois.

15. I did not file an appearance in the Illinois litigation.

16. I did receive an email from Stoller attaching a proposed joint status report on June 2, 2019, wherein Stoller advised I had until June 5 to respond to him.

17. I did not respond to Stoller. The proposed report was improperly represented as an agreed document.

18. The Arizona eviction case is presently stayed pending resolution of the refiled removal petition pending in the Northern District of Illinois.


19. A frivolous litigant order was entered against Stoller on September 24, 2013 in other litigation filed in the United States District Court for the District of Arizona, under case number 12-1307-PHX-GMS. A true and correct copy of this order is attached as **Exhibit 1** to this Declaration.

20. Case number 12-1307-PHX-GMS involved litigation over loans secured by four different properties, including the property located at 28437 N. 112th Way in Scottsdale, the same property that is the subject of the eviction case pending in Maricopa County which Stoller seeks to remove to federal court in Illinois. *See* Exhibit 1 at p. 5.

21. This order prevents Stoller and his brother Christopher Stoller (who was identified by the court as an incarcerated individual subject to the Prison Reform Litigation Act) from initiating any litigation relating to the 28437 N. 112th Way property “absent pre-filing review and permission from this Court.” *See* Exhibit 1 at p. 20.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11th day of July 2019.



Joseph J. Tirello, Jr.

EXHIBIT 2

ASSIGNMENT OF THE CAUSES OF ACTION, ASSIGNMENT OF PROCEEDS

For Ten Dollars and other valuable consideration, PHILLIP B STONE, (*Assignor*) assigns, grants, transfers, and conveys unto Christopher Stoller Pension and Profit Sharing Plan Ltd., a Bahamas Corporation, and/or Christopher Stoller and/or Leo Stoller (collectively, *Assignee*), under the Law of Assignments of Causes of Action, insofar as permitted by law, forever, any and all causes of action, remedies, or claims, now or in the future, that Assignor may have against any party, not limited to financial institutions, contractors, builders, and their employees, affiliates, successors and assigns, et al., as well as the right to prosecute such causes of action in the name of Assignor or Assignee, or any of them, and the right to settle or otherwise resolve such causes of action as Assignee sees fit, regarding the following real property in Maricopa County, State of Arizona;

Lot 3, Pinnacle Foothills, according to Book 398 of Maps, Page 50,
records of Maricopa County, Arizona.

which is located at and known as: 28437 N 112th Way, Scottsdale, AZ 85262.

Claim(s) shall mean any claim, liability, right, demand, suit, matter, obligation, damage, loss, cost, action, or cause of action, of every kind and description that Assignor has or may have, including assigned claims, whether known or unknown, asserted or unasserted, latent or patent, that is, has been, could reasonably have been, or in the future might reasonably be asserted, by Assignor in any action or proceeding in court, regardless of legal theory, and regardless of the type or amount of relief or damages claimed, against any party, known or unknown, arising from or in any way relating to said property.

The provisions of this Assignment are severable. Should any of the provisions herein for any reason be held to be unenforceable in any respect, such unenforceability will not affect any other provision of this Assignment. Such provision will be enforced to the maximum extent permissible, or if by limiting such provision it would become valid or enforceable, this Assignment will then be construed as if such unenforceable provision or provisions had been written, construed, and enforced as so limited.

This Assignment shall be governed under the laws of the State of Arizona.

Assignee waives any statute of limitations which may apply in any action based upon this Assignment.

This Assignment is being made without recourse to Assignee.

Assignor agrees to cooperate fully with Assignee in the preparation and execution of all documents necessary or incidental to this Assignment and the protection and preservation of rights herein assigned to Assignee.

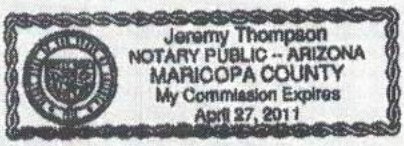
Dated: September 19th, 2008

Phillip B Stone
PHILLIP B STONE

State of Arizona)
County of Maricopa) ss:
)

On September 19th, 2008, before me personally appeared PHILLIP B STONE proved to me on the basis of satisfactory evidence to be the individual(s) executing this instrument. WITNESS my hand and official seal.

Jeremy Thompson
Notary Public



Commission Expires: 4-27-2011

EXHIBIT 4

United States Bankruptcy Court

District of New Mexico

Case No. 10-11558-j7

Chapter 7

In re: Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Philip B. Stone
P.O. Box 2626
Santa Fe, NM 87504

Charlotte A. Stone
P.O. Box 2626
Santa Fe, NM 87504

Last four digits of Social Security or other
Individual Taxpayer-Identification No(s), (if any):

xxx-xx-5986

xxx-xx-6044

Employer's Tax-Identification No(s), /Other No(s) (if any):

DISCHARGE OF DEBTOR

It appearing that the debtor is entitled to a discharge,

IT IS ORDERED:

The debtor is granted a discharge under section 727 of title 11 United States Code (the Bankruptcy Code).

BY THE COURT

Dated: 7/19/10

Robert H. Jacobvitz
United States Bankruptcy Judge

SEE THE BACK OF THIS ORDER FOR IMPORTANT INFORMATION.

Dennis Chavez Federal Building and United States Courthouse
500 Gold Avenue SW, 10th Floor
PO Box 546
Albuquerque, NM 87103-0546
505-348-2500/866-291-6805
www.nmcourt.fed.us/usbc

Case No.: 10-11558-j7
Chapter: 7
Judge: Robert H. Jacobvitz
Judge/341 Location: JS

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re Debtor(s):

Philip B. Stone
P.O. Box 2626
Santa Fe, NM 87504
SSN/ITIN(if any): xxx-xx-5986

Charlotte A. Stone
P.O. Box 2626
Santa Fe, NM 87504
SSN/ITIN(if any): xxx-xx-6044

FINAL DECREE

The estate of the debtor(s) having been fully administered,

IT IS ORDERED that Yvette Gonzales is discharged as trustee of the estate, the bond is cancelled, and this chapter 7 case is closed.

Robert H. Jacobvitz
United States Bankruptcy Judge

On the date shown on the associated Notice of Electronic Filing, a copy of this document was (1) electronically mailed to the persons so identified on this document's notice of electronic filing, (2) electronically transmitted to the Bankruptcy Noticing Center (BNC) for service on filers associated with this case who are not registered for electronic filing as will be reflected on the BNC's certificate of mailing and (3) sent via first class mail, postage prepaid, to any person indicated here, at the address shown.

nm_finaldecree.jsp

EXHIBIT 5

Re: Joint Status Report Illinois Case No. 19-cv-1821**L Stoller**

Sun 6/2/2019 5:43 PM

To: Joseph Tirello <jtirello@zbslaw.com>**Bcc** Christopher Stoller <cns40@hotmail.com>; philip kiss <philip_kiss@comcast.net>; ldms4@hotmail.com <replyadmin.7QeSFqtg@3639012104.Reflectorturbines.me> 1 attachments (22 KB)

Joint Status Report.docx;

Mr. Tirello**Re: Joint Status Report Wilmington v. Stoller 19 cv-1821**

This is the defendants attempt to confer with you Mr. Tirello regarding our Joint Status Report which the Chicago District Court Judge requested that we file in the Northern District of Illinois.

Please take a look at the proposed joint status report and dates for discovery. If you want to make any changes please feel free to do so, if we do not hear back from you we will file the Joint Status Report on June 5, 2019 pursuant to court order.

If your client does not care to prosecute this case please advise and we will move to dismiss it with prejudice.

Please advise.

Cordially

Christopher Stoller

From: Joseph Tirello <jtirello@zbslaw.com>**Sent:** Tuesday, October 30, 2018 10:46 AM**To:** 'L Stoller'**Subject:** RE: Response to your Oct 22, 2018

Good Morning Mr. Stoller,

I am providing this response to your most recent e-mail correspondence sent today to clarify your most recent e-mail correspondence.

First, I have not been served with a summons or complaint and I have not acknowledge any such service. Second, I have never stated that I represent Altisource nor have I indicated that I have the authority to accept service on their behalf.

Thank you,

Joseph J. Tirello, Jr., Esq.
Attorney and Regional Manager
Zieve, Brodnax & Steele, LLP

3550 N. Central Ave., Ste. 625, Phoenix, AZ 85012

(P) 602-282-6188 x204 (eFAX) 602-865-8086 (E) jtirello@zbslaw.com (W) www.zbslaw.com

Licensed to practice law in Arizona

Firm Representation in: CA | AZ | NV | WA | OR

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From: L Stoller [mailto:ldms4@hotmail.com]

Sent: Tuesday, October 30, 2018 8:42 AM

To: Joseph Tirello; Katherine Walker; Ryan Davies; Erin McCartney; Janaya Carter; Stephen Dolembro; Mark Krause; Samantha MacLeod; Ryan Stibor; Scott Crawford; Jennifer Needs; Jeff Tchakarov; Kim Lepore; Shadd Wade; Jonathan Damen; Steve Baker; Talia Cortese; Brad Klein

Cc: asps_ombudsman@altisource.com; philip kiss; editor NewYork Times; La Times; OakPark Pioneerpress; WallStreet Journal; Chicago Lawyer Magazine; Law Bulletin Subscriptions; ABC News update; newsmagazine abc; Assig cbs; Editor Tribune; AZRepublicCustomerService@gannett.com; national washpost; Christopher Stoller

Subject: Re: Response to your Oct 22, 2018

Joseph Tirello

Re: Stoller v. Joseph Tirello Chicago District Court Case 18-cv-07169

Mr. Tirello you have been served with summons and complaints for yourself and as well as the members of your firm yesterday 10-29-18 which you have acknowledged.

You had agreed to accept service on behalf of your client Altisource. You were served with summons and complaint for Altisource. Today we will be filing a certificate of Service with the Federal Court for service on Altisource. If you have any objection to that filing based upon your agreement to accept service please advise by email by 12:00 noon Phoenix. Otherwise we will file with the Chicago Federal Court.

Secondly, your client and your firm would like to resolve this matter at this early stage of the proceeding please advise and we will send to your a global settlement agreement. This settlement offer is valid until 12:00noon Oct 31, 2018.

We look forward to hearing from you by return email. Also please advise if you plan on representing yourself or who your counsel will be for this matter, as we have additional pleadings that we want to serve on you.

Cordially,

Christopher Stoller ED

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SUE THE BASTARDS



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CHICAGO-(AEAE) Justice Anthony M. Kennedy announced Wednesday that he is retiring from the Supreme Court, a move that finally gives President Trump the chance to replace the court's pivotal justice...

From: L Stoller <ldms4@hotmail.com>

Sent: Tuesday, October 30, 2018 12:28 AM

To: Joseph Tirello; kwalker@zbslaw.com; rdavies@zbslaw.com; emccartney@zbslaw.com; jcarter@zbslaw.com; sdolembo@zbslaw.com; mkrause@zbslaw.com; smacleod@zbslaw.com; rstibor@zbslaw.com; scrawford@zbslaw.com; jneeds@zbslaw.com; jtchakarov@zbslaw.com; klepore@zbslaw.com; swade@zbslaw.com; jdamen@zbslaw.com; srbaker@zbslaw.com; tcortese@zbslaw.com; bklein@zbslaw.com

Cc: asps_ombudsman@altisource.com; philip kiss; editor NewYork Times; La Times; OakPark Pioneerpress; WallStreet Journal; Chicago Lawyer Magazine; Law Bulletin Subscriptions; ABC News update; newsmagazine abc; Assig cbs; Editor Tribune; AZRepublicCustomerService@gannett.com; national washpost; Christopher Stoller; L Stoller

Subject: Re: Response to your Oct 22, 2018

Joseph Tirello

Can you provide us with the names of any other lawyers in your firm that were involved in the creation and distribution of your letter sent to me to vacate my house?

And the name of the attorney who will be representing you in Chicago?

Cordially

Christopher Stoller Executive Director of the Americans for the Enforcement of Attorney Ethics (AEAE)
www.rentamark.net

SUE THE BASTARDS



www.rentamark.net



CHICAGO-(AEAE) Justice Anthony M. Kennedy announced Wednesday that he is retiring from the Supreme Court, a move that finally gives President Trump the chance to replace the court's pivotal justice...

From: L Stoller <ldms4@hotmail.com>

Sent: Monday, October 29, 2018 11:40 PM

To: Joseph Tirello; kwalker@zbslaw.com; rdavies@zbslaw.com; emccartney@zbslaw.com; jcarter@zbslaw.com; sdolembo@zbslaw.com; mkrause@zbslaw.com; smacleod@zbslaw.com; rstibor@zbslaw.com; scrawford@zbslaw.com; jneeds@zbslaw.com; jtchakarov@zbslaw.com; klepore@zbslaw.com; swade@zbslaw.com; jdamen@zbslaw.com; srbaker@zbslaw.com; tcortese@zbslaw.com; bklein@zbslaw.com

Cc: asps_ombudsman@altisource.com; philip kiss; editor NewYork Times; La Times; OakPark Pioneerpress; WallStreet Journal; Chicago Lawyer Magazine; Law Bulletin Subscriptions; ABC News update; newsmagazine abc; Assig cbs; Editor Tribune; AZRepublicCustomerService@gannett.com; national washpost

Subject: Re: Response to your Oct 22, 2018

Mr. Tirello

Stoller v. Tirello

Today you, your firm and members of your firm were served with a Federal Racketeering Lawsuit today. In that law suit your are charged with subornation of perjury.

The property that you were attempting to defraud us out of we have owned for 10 years. You and your law firm had knowledge of this fact and were attempting to defraud us out of our property. You and your firm are charged you with a civil racketeering, in a multi count complaint.

I informed you that I would have all of our documents presented to you and your firm on Monday.

You and every member of your firm have actual notice and constructive notice of the Chicago Federal laws suit Case No. 18-cv-07169.

We are attaching a second copy of the complaint and serving it on you. You stated that you would accept service on behalf of your client Altisource.

If you have any questions?

Cordially

Christopher Stoller

From: L Stoller <ldms4@hotmail.com>
Sent: Wednesday, October 24, 2018 4:09 PM
To: Joseph Tirello
Subject: Re: Response to your Oct 22, 2018

Mr. Trello

Re: your email Oct 24, 2018
28437 112st Way
Scottsdale Az 85262

Thank you for your quick response. We will be happy to provide you with a copy of our warranty deed which we are locating.

We are confident that this matter can be resolved amicably as between the parties.

Mr. Tirello you stated that, "My client holds a trustee's deed upon sale for this property that was previously foreclosed upon".

Foreclosed upon?

Mr. Trello, we are entitled to know who is your client, that is asserting their alleged rights to the subject property?

Can you please provide us with a "Published copies of the Notice of Trustee Sale. Name of the trustee who is alleged to have conducted the sale? Name of the successful bidder at the trustee sale. The date of the trustee sale and a copy of the payment made to the trustee? A copy of the trustee deed?

Please email us copies of the above documents.

All of the information you have in your possession and/or control, otherwise your client would not have authorized your firm to have sent your Oct. 22, 2018 letter.

If you have any questions please email us. We look forward to receiving the information we requested. We will be emailing you a copy of our Warranty Deed shortly.

Current owners
Christopher Stoller E.D.
Michael Stoller
L. Stoller
28437 112st Way
Scottsdale Az 85262

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From: Joseph Tirello <jtirello@zbslaw.com>
Sent: Wednesday, October 24, 2018 9:20 AM
To: 'L Stoller'
Subject: RE: Response to your Oct 22, 2018

Good Morning,

My client holds a trustee's deed upon sale for this property that was previously foreclosed upon. Under Arizona law, a trustee's deed upon sale provides for the presumption that my client is entitled to possession of the property in question.

Please provide the warranty deed to me that demonstrates your right to the property and I will be able to confirm whether or not this was an error.

Thank you,

Joseph J. Tirello, Jr., Esq.
Attorney and Regional Manager
Zieve, Brodnax & Steele, LLP
3550 N. Central Ave., Ste. 625, Phoenix, AZ 85012
(P) 602-282-6188 x204 (eFAX) 602-865-8086 (E) jtirello@zbslaw.com (W) www.zbslaw.com

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From: L Stoller [<mailto:ldms4@hotmail.com>]
Sent: Tuesday, October 23, 2018 10:27 PM
To: Joseph Tirello
Subject: Fw: Response to your Oct 22, 2018

Mr. Joseph Tirello
Zieve Brodnan & Steele

Re: your letter Oct 22, 2018
28437 112st Way
Scottsdale Az 85262

There seems to be a misunderstanding. You addressed your letter to a Philip Stone, who has not lived at 28437 112 st Way since 2008 and does not have possession of the said property since 86'.

We have possession of the said property which belongs to us.

We hold a warranty deed to the subject property 28437 112St Way, Scottsdale Arizona 85262, which you would have knowledge of, if you did your due diligence, prior to sending your letter.

Can you please advise us who your client is that is alleging that they have rights to our home, the subject property, and please provide us with whatever the copies of documents, ie Deed upon which your client is asserting rights to the subject property superior to ours.

We are confident that this matter can be resolved amicably.

Please direct all correspondent regarding this matter to :

Christopher Stoller E.D.
Michael Stoller
L. Stoller
P.O. Box 60645
Chicago, Illinois 60660

Or you can call me at 773-746-3163

We look forward to a prompt email response.

Cordially

Christopher Stoller ED



Virus-free. www.avg.com

EXHIBIT 6

1 Joseph J. Tirello, Esq. (AZ Bar #033371)
2 jtirello@zbslaw.com
3 **ZIEVE, BRODNAX & STEELE, LLP**
3550 North Central Avenue, Suite 625
4 Phoenix, AZ 85012
Phone: (602) 282-6188
5 Fax: (602) 865-8086
AZEvictions@zbslaw.com
6 Attorney for Plaintiff

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MARICOPA**

9 Case No. CV 2018-013457

10 Wilmington Trust, National Association,
not in its individual capacity but as
11 Trustee of ARLP Securitization Trust,
Series 2014-2,

12 Plaintiff,

13 v.

14 Philip B. Stone, Occupants and Parties-In-
Possession,

15 Defendant(s),
16

SUMMONS

(FORCIBLE ENTRY
AND DETAINER)

17 FROM THE STATE OF ARIZONA TO THE DEFENDANTS:

18 Philip B. Stone, Occupants and Parties-In-Possession

19 **YOU ARE HEREBY SUMMONED** to appear and defend in this action pursuant to

20 A.R.S. § 12-1175 at the following place and time:

21 BEFORE: Hon.

Nov 15, 2018 @ 9:00 AM

22 DATE AND TIME:

COMMISSIONER DAVID GARBARINO
101 W. JEFFERSON, (ECB) 8TH FLOOR, COURTROOM 813
PHOENIX, AZ 85003

23 PLACE:
24

25 Plaintiff seeks to recover possession of the property generally described as
26 28437 N. 112th Way, Scottsdale, AZ 85262.
27
28

1 **YOU ARE HEREBY NOTIFIED** that in case of your failure to appear and
2 defend at the time and place shown above, judgment by default may be rendered against
3 you for the relief demanded in the Complaint. The name and address of the plaintiff's
4 attorney is shown at the top left corner of page one of this Summons.

5 **Requests for reasonable accommodation for persons with disabilities must be**
6 **made to the division assigned to the case by parties at least three (3) judicial days in**
7 **advance of a scheduled court proceeding.**

8 **Requests for an interpreter for persons with limited English proficiency must**
9 **be made to the division assigned to the case by the party needing the interpreter**
10 **and/or translator or his/her counsel at least ten (10) judicial days in advance of a**
11 **scheduled court proceeding.**

12 SIGNED AND SEALED on this date: _____



COPY
OCT 30 2018

Clerk of the Superior Court

CHRIS DEROSE, CLERK
DEPUTY CLERK

By _____
Deputy Clerk

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RESIDENTIAL EVICTION INFORMATION SHEET

(PUBLICATION AND DISTRIBUTION REQUIRED BY THE ARIZONA SUPREME COURT)

Notice. A landlord must provide a tenant with written notice saying why the eviction process has started. The tenant should have received this notice before this lawsuit was filed or with the summons.

Rent cases. If this lawsuit has been filed for not paying rent, the tenant can stop it and continue living in the residence by paying all rent now due, late fees, attorney's fees and court costs. After a judgment has been granted, reinstatement of the lease is solely in the landlord's discretion. Inability to pay rent is not a legal defense and the judge cannot give more time to pay, even if the tenant is having financial problems.

Before Court. Eviction cases move through the court system very quickly. If the tenant disagrees with the landlord's allegations, the tenant is encouraged to file a written answer. The answer form available from the justice court allows the tenant to admit or deny the allegations and explain his or her position. If the tenant cannot afford to pay the answer fee, he or she may apply for a waiver or deferral of that fee. If a tenant believes that the landlord owes him or her money, the tenant may under some circumstances file a counterclaim. The summons states that a trial will occur on the date listed, but due to the high volume of cases, a trial may not occur then. If the tenant fails to appear, and the landlord or his attorney is present, a judgment will probably be entered against the tenant. Tenants can represent themselves or arrange for lawyers to represent them. The court will not provide a lawyer.

At Court. At the time and date listed on the summons, the judge will start calling cases. If both parties are present, the judge will ask the tenant whether the complaint is true. If the tenant says "no", he or she will need to briefly tell the judge why. If the reason is a legal defense, the judge will need to hear testimony from both sides and make a decision after a trial. After talking to the landlord or its attorney, a tenant may wish to agree to what the landlord is requesting by signing a "stipulation". A stipulation is an agreement under which the parties resolve the dispute on the basis of what the agreement says. Only matters contained in the written agreement can be enforced. These agreements should be clear and understandable by both parties. Most stipulations include judgments against tenants.

Continuances. Either party may ask that the court date be delayed. The court will agree only if there is a very good reason. A delay will be no more than three business days. There is no assurance a delay will be granted and parties should come to court prepared for trial and bring necessary witnesses and documents.

After a Judgment. If a landlord receives a judgment, it may apply for a writ of restitution to remove the tenant(s) and all occupants. Writs of Restitution are served by constables, who will direct the residents to leave. A tenant may avoid the difficulties associated with a writ of restitution by vacating the property and returning the keys to the landlord. This ends the tenants' possession of the residence. A tenant will have five (5) days to vacate the premises unless the court has found a material and irreparable breach of the lease by the tenant, in which case the tenant has only twelve (12) to twenty-four (24) hours to vacate. A judgment will probably appear on a tenant's credit report for several years. Parties wishing to appeal from a judgment have five days to do so after the judgment is entered and can obtain forms and information from the court filing counter. If a tenant wants to remain in the rental home during the appeal, the tenant must also pay an appropriate bond and continue to pay rent into court as it becomes due. If the tenant prevails the court will dismiss the case. Absent an appeal, the tenant will need to obtain the landlord's approval and enter a new lease to continue living in the residence.

Sources of Additional Information. You can get copies of the Arizona Residential Landlord Tenant Act, the Arizona Mobile Home Parks Residential Landlord and Tenant Act and the Long Term Recreational Vehicle Rental Space Act from a library or from the Secretary of State's office or web page: www.azsos.gov. In Maricopa County if you wish to consult an attorney, you may want to contact the Arizona State Bar Attorney Referrals Line at (602) 257-4434 or Community Legal Services at (602) 258-3434. Contact the court in other counties for similar referrals. You can obtain a summary of the obligations of landlords and tenants on the web page for justice courts in Maricopa County: www.superiorcourt.maricopa.gov/justicecourts/info.

COPY

OCT 30 2018



CHRIS DEROSE, CLERK
Chris Derosé
DEPUTY CLERK

1 Joseph J. Tirello, Jr., Esq. (AZ Bar #033371)
2 jtirello@zbslaw.com
3 **ZIEVE, BRODNAX & STEELE, LLP**
3550 North Central Avenue, Suite 625
4 Phoenix, AZ 85012
Phone: (602) 282-6188
5 Fax: (602) 865-8086
AZEvictions@zbslaw.com
6 Attorney for Plaintiff

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MARICOPA**

9 Wilmington Trust, National Association,
not in its individual capacity but as
10 Trustee of ARLP Securitization Trust,
Series 2014-2,

Case No. CV 2018-013457

**CERTIFICATE OF
COMPULSORY ARBITRATION**

11 Plaintiff,

12 v.

13 Philip B. Stone, Occupants and Parties-In-
14 Possession,

15 Defendants.

16 Pursuant to Rule 72, Arizona Rules of Civil Procedure, Plaintiff, through undersigned
17 counsel, certifies that this case is not subject to Compulsory Arbitration, because Plaintiff
18 seeks affirmative relief other than a money judgment.
19

20 DATED this 30th day of October 2018

21 **ZIEVE, BRODNAX & STEELE, LLP**

22 *Joseph J. Tirello, Jr.*
23 _____
24 Joseph J. Tirello, Jr.
25 Attorney for Plaintiff
26
27
28

COPY

OCT 30 2018



CHRIS DEROSE, CLERK
Chris Derosé
DEPUTY CLERK

1 Joseph J. Tirello, Jr., Esq. (AZ Bar #033371)
2 jtirello@zbslaw.com
3 **ZIEVE, BRODNAX & STEELE, LLP**
3550 North Central Avenue, Suite 625
4 Phoenix, AZ 85012
Phone: (602) 282-6188
5 Fax: (602) 865-8086
AZEvictions@zbslaw.com
6 Attorney for Plaintiff

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MARICOPA**

9 Case No. **CV 2018-013457**

10 Wilmington Trust, National Association,
11 not in its individual capacity but as
Trustee of ARLP Securitization Trust,
12 Series 2014-2,

13 Plaintiff,

14 v.

15 Philip B. Stone, Occupants and Parties-In-
16 Possession,

17 Defendant(s),

COMPLAINT

(Forcible Entry
and Detainer)

18
19 **YOU ARE BEING SUED TO BE EVICTED FROM THE RESIDENCE.**

20 **PLEASE READ CAREFULLY.**

21 Wilmington Trust, National Association, not in its individual capacity but as Trustee
22 of ARLP Securitization Trust Series 2014-2, as Plaintiff in this action for its Complaint
23 alleges as follows:

24 1. Plaintiff is authorized to bring this action in Arizona. The Defendants are all
25 residents of Maricopa County, Arizona. The real property (the "Property") that is the subject
26 of this complaint is located in Maricopa County, Arizona and the events referred to herein
27 occurred in Maricopa County, Arizona. The true names of the Defendants identified as
28 Occupants or Parties-In-Possession are unknown at this time and Plaintiff reserves the right

1 to amend this Complaint when the names of such fictitious Defendants become known. Each
2 such fictitious Defendant may be occupying the Property that is the subject of this complaint
3 with or without the consent of the other named Defendants.

4 2. Plaintiff was the holder of a Promissory Note in an original amount of
5 \$600,000.00. The Note was secured by a Deed of Trust dated May 2, 2006 and recorded as a
6 lien against the Property, generally described as 28437 N. 112th Way, Scottsdale, AZ 85262,
7 and legally described as:

8 LOT 3, PINNACLE FOOTHILLS, ACCORDING TO BOOK 398 OF MAPS, PAGE
9 50, AND AFFIDAVIT OF CORRECTION RECORDED IN DOCUMENT NO. 96-0145582,
10 RECORDS OF MARICOPA COUNTY, ARIZONA.

11 EXCEPTING ALL MINERALS AND ALL URANINUM, THEORIUM OR OTHER
12 MATERIALS WHICH ARE OR MAY BE DTERMINED TO BE PECULIARLY
13 ESSENTIAL TO TH PRODUCTION OF FISSIANABLE MATERIALS, AS RESEVED IN
14 THE PATENT RECORDED IN DOCKE T304, PAGE 447.

15 3. The Note fell into default.

16 4. The Plaintiff appointed Western Progressive-Arizona, Inc. as Successor Trustee
17 of the Deed of Trust. Pursuant to the terms and conditions of the Deed of Trust and
18 applicable Arizona law, the Plaintiff instructed the Successor Trustee to initiate a Trustee's
19 Sale of the Property. The Successor Trustee recorded a Notice of Trustee's Sale in the office
20 of the Maricopa County Recorder on July 13, 2005.

21 5. The Trustee's Sale was conducted in accordance with applicable Arizona law.
22 The Plaintiff was the successful bidder of the Property at the Trustee's Sale held on
23 December 16, 2015, for its high bid in the amount of \$432, 000.00. Plaintiff is entitled to the
24 sole and exclusive possession of the Property pursuant to a Trustee's Deed Upon Sale,
25 recorded with the office of the Maricopa County Recorder. A copy of the Trustee's Deed
26 Upon Sale is attached hereto as **Exhibit "A"** and is incorporated herein by this reference.

27 6. The Plaintiff has made written demand upon the Defendant and any occupants
28 to vacate and surrender possession of the Property. Notwithstanding Plaintiff's written

1 demand, the Defendants have refused and continue to refuse to surrender possession of the
2 Property. A copy of the written demand is attached hereto as **Exhibit "B"**, and is
3 incorporated herein by this reference.

4 7. Each Defendant is guilty of forcible detainer as defined by A.R.S. § 12-
5 1173.01(2).

6 8. Pursuant to terms of the Note, Deed of Trust, and A.R.S. § 12-341.01, Plaintiff
7 is entitled to recover its attorney's fees and costs incurred in this action.

8 WHEREFORE Plaintiff requests that this Court enter its Order granting Plaintiff relief
9 as follows:

10 A. That each Defendant be found guilty of forcible detainer;

11 B. That the Defendants and all persons occupying the Property are ordered
12 to vacate the Property immediately and that Plaintiff be awarded immediate and exclusive
13 possession thereof. That in the event the Defendants refuse to obey said order and upon the
14 request of Plaintiff, the Clerk of the Maricopa County Superior Court shall issue a Writ of
15 Restitution after the fifth calendar day following the date of the judgment commanding the
16 Sheriff of Maricopa County, Arizona to execute that Writ of Restitution and assist in
17 removing Defendants from the property;

18 C. That Plaintiff be awarded the reasonable rental value of the Property
19 during the period of time of Defendants' forcible detainer, in an amount to be determined at
20 the preliminary hearing or trial, based upon the amount of the monthly payment due under the
21 Note or the fair rental value, whichever is higher, from the date of the Trustee's Sale pro-
22 rated until the date of the judgment;

23 D. That Plaintiff be awarded its reasonable attorney's fees incurred herein
24 in an amount not to be less than \$750.00;

25 E. That Plaintiff be awarded its court costs incurred and accruing costs;

26 F. For interest on the outstanding balance amount of the judgment at the
27 rate of 10% per annum until paid; and

28 G. That any personal property abandoned in the Property shall be

1 administered by Plaintiff pursuant to ARS § 33-1370..

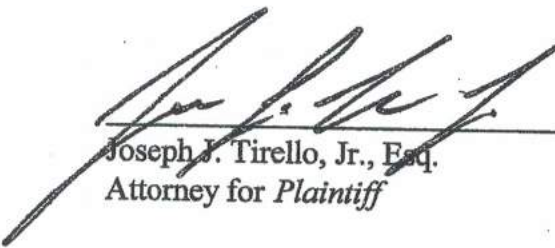
2 H. For such other and further relief as the Court deems just and equitable.

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

4 DATED this 30th day of October 2018.

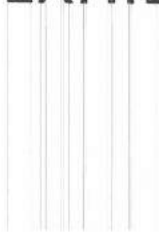
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ZIEVE, BRODNAX & STEELE, LLP



Joseph J. Tirello, Jr., Esq.
Attorney for Plaintiff

EXHIBIT A



TS No.: 2014-00198-AZ
Recording Requested by:
Western Progressive – Arizona, Inc.

1451314812597-3-1-1--
Hoyp

When Recorded Mail to:
And Forward Tax Statements to:
Wilmington Trust, National Association, not
in its individual capacity but as Trustee of ARLP
Securitization Trust, Series 2014-2
C/O Ocwen Loan Servicing, LLC
Attention: Vault Department
5720 Premier Park Drive
West Palm Beach
FL- 33407

TS #: 2014-00198-AZ
A.P.N.: 216-74-044-9

EXEMPT PER A.R.S. § 11-1134(B)(1)

TRUSTEE'S DEED UPON SALE

Western Progressive – Arizona, Inc., as the duly appointed Trustee (or successor Trustee or Substituted Trustee), under the Deed of Trust hereunder more particularly described, does hereby GRANT and CONVEY, but without covenant or warranty, express or implied, to

Wilmington Trust, National Association, not in its individual capacity but as Trustee of ARLP Securitization Trust, Series 2014-2

(herein called "Grantee"), all right title and interest conveyed to and now held by it as Trustee under the Deed of Trust in and to the property situated in the County of Maricopa, State of Arizona, described as follows:

LOT 3, PINNACLE FOOTHILLS, ACCORDING TO BOOK 398 OF MAPS, PAGE 50, AND AFFIDAVIT OF CORRECTION RECORDED IN DOCUMENT NO. 96 0145582, RECORDS OF MARICOPA COUNTY, ARIZONA.

EXCEPTING ALL MINERALS AND ALL URANIUM, THORIUM OR OTHER MATERIALS WHICH ARE OR MAY BE DETERMINED TO BE PECULIARLY ESSENTIAL TO THE PRODUCTION OF FISSIONABLE MATERIALS, AS RESERVED IN THE PATENT RECORDED IN DOCKET 304, PAGE 447.

TRUSTEE'S DEED UPON SALE

A.P.N.:216-74-044-9

This conveyance is made pursuant to the powers, including the power of sale, conferred upon Trustee by the Deed of Trust executed by Philip B. Stone, A Married Man, As His Sole And Separate Property , as Trustor, Countrywide Bank, N.A., A NATL. ASSN., as Lender, Mortgage Electronic Registration Systems, Inc., as Beneficiary dated 05/02/2006, and recorded on 05/09/2006 as Instrument No. 20060627298 Book ---, Page --- of the Official Records in the office of the Recorder of Maricopa County, Arizona, and in compliance with the laws of the State of Arizona authorizing this conveyance.

Said property was sold by Trustee at public auction on 12/16/2015 at the place named in the Notice of Trustee's Sale. Grantee, being the highest bidder at said sale, became the purchaser of said property for the amount bid, being \$432,000.00, which payment was made either entirely in cash or by the satisfaction, protanto, of the obligations then secured by said Deed of Trust.

"In witness thereof, Western Progressive - Arizona, Inc., as trustee, has this day, caused its name to be hereunto affixed by its duly-authorized agent."

Western Progressive – Arizona, Inc.



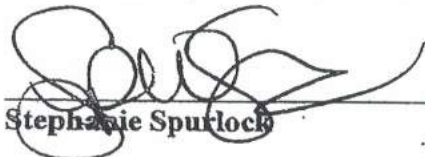
By:Chelsea Jackson, Trustee Sale Assistant

DATED: 12/21/2015

STATE OF Georgia
COUNTY OF Fulton

On 12/21/2015, before me, the undersigned, a Notary Public in and for the said State, duly commissioned and sworn, personally appeared Chelsea Jackson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person who executed the within instrument and acknowledged to me that he/she executed the same in his/her authorized capacity, and that by his/her signature on the instrument, the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.


Stephanie Spurlock

Grantee Contact Information

Pursuant to A.R.S. § 33-401, Grantee is incorporated, organized, licensed, chartered or registered in the State and Country reflected below:

Wilmington Trust, National Association, not in its individual capacity but as Trustee of
ARLP Securitization Trust, Series 2014-2
C/O Ocwen Loan Servicing, LLC
1661 Worthington Road
West Palm Beach, FL 33409

EXHIBIT B

Liddy Legal Support Services

PO Box 2007, Phoenix, AZ 85001

63 E. Pennington St., #102, Tucson, AZ 85702

2700 Woodlands Village Blvd., #300-420, Flagstaff, AZ 86001

Phoenix 602-297-0676, Tucson 520-628-2824, Flagstaff 928-225-7737

Client File # 18004751

Account # 0397

Invoice # 320655

Liddy # 279520-1

WILMINGTON TRUST, N.A.,

vs

PHILIP B. STONE, et al.,

CERTIFICATE OF SERVICE BY PRIVATE PROCESS SERVER

ENTITY/PERSON TO BE SERVED: Philip B. Stone and/or Occupants

PLACE OF SERVICE: 28437 N. 112th Way, Scottsdale, AZ, 85262

DATE OF SERVICE: On the 23rd day of October, 2018 at 3:38 PM County Maricopa

PERSONAL SERVICE Left a copy with a person authorized to accept service. At this usual place of abode, I left a copy with a person of suitable age and discretion residing therein.

Name of Person Served and Relationship/Title Document posted upon main. On 10/24/18 I mailed a copy of the document listed below to the address stated above via Certified Mail, return receipt requested and by First Class Mail, postage pre-paid.

on 10/22/2018 we received the following documents for service:

Notice to Vacate

Received from ZIEVE, BRODNAX & STEELE, LLP, (JOSEPH TIRELLO #033371)

PROCESS SERVER: Corey W. Davis #8362

The undersigned states: That I am a certified private process server in the county of Maricopa and am an Officer of the Court.

SIGNATURE OF PROCESS SERVER:  Date: 10/24/2018

Item	Amount
Posting	\$65.00

Total \$65.00

Tax ID# 90-0533870
I declare under penalty of perjury that the foregoing is true and correct and was executed on this date.

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee \$ 3.45

Extra Services & Fees (check box, add fees as appropriate)

- Return Receipt (hardcopy) \$ 2.75
- Return Receipt (electronic) \$ _____
- Certified Mail Restricted Delivery \$ _____
- Adult Signature Required \$ _____
- Adult Signature Restricted Delivery \$ _____

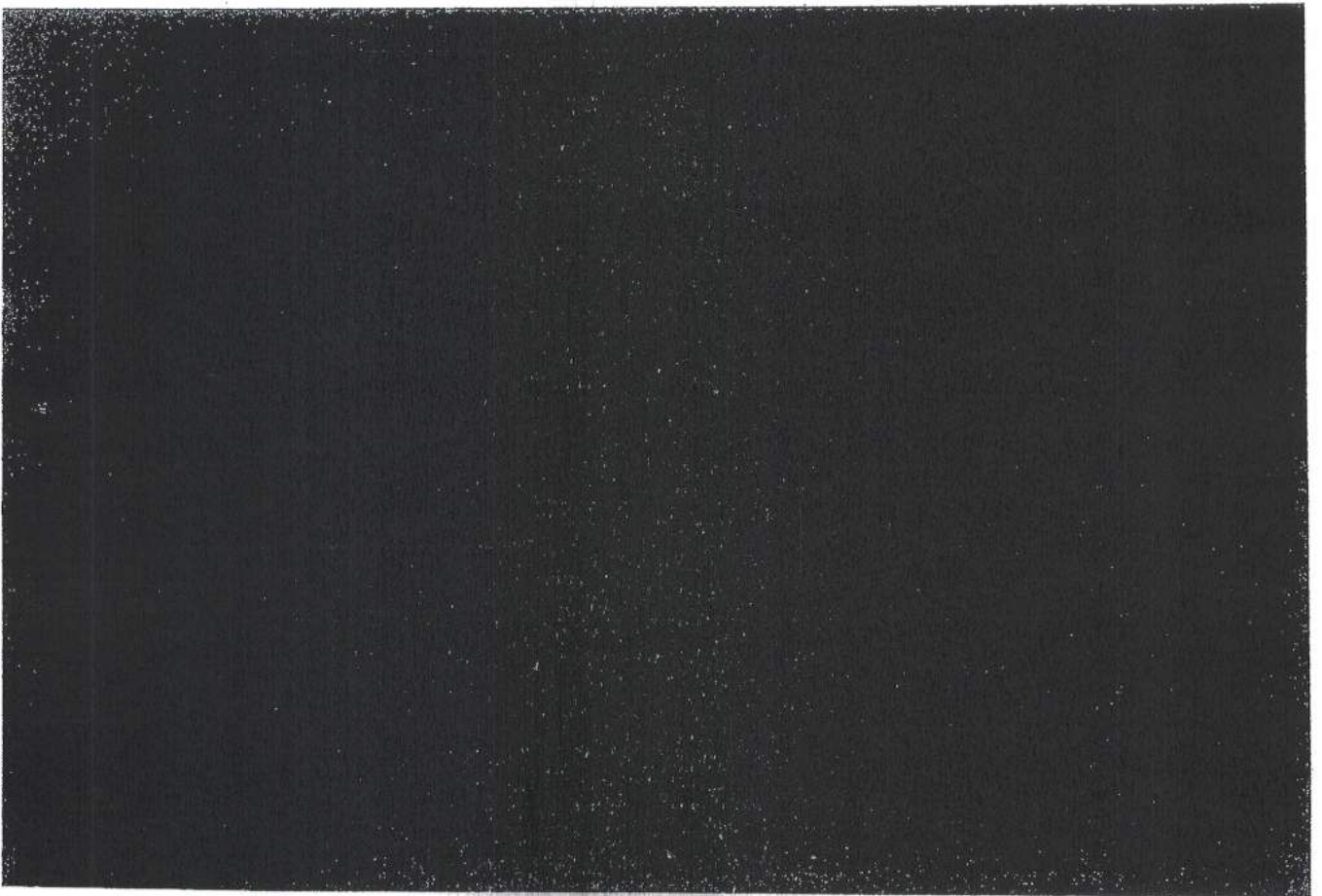
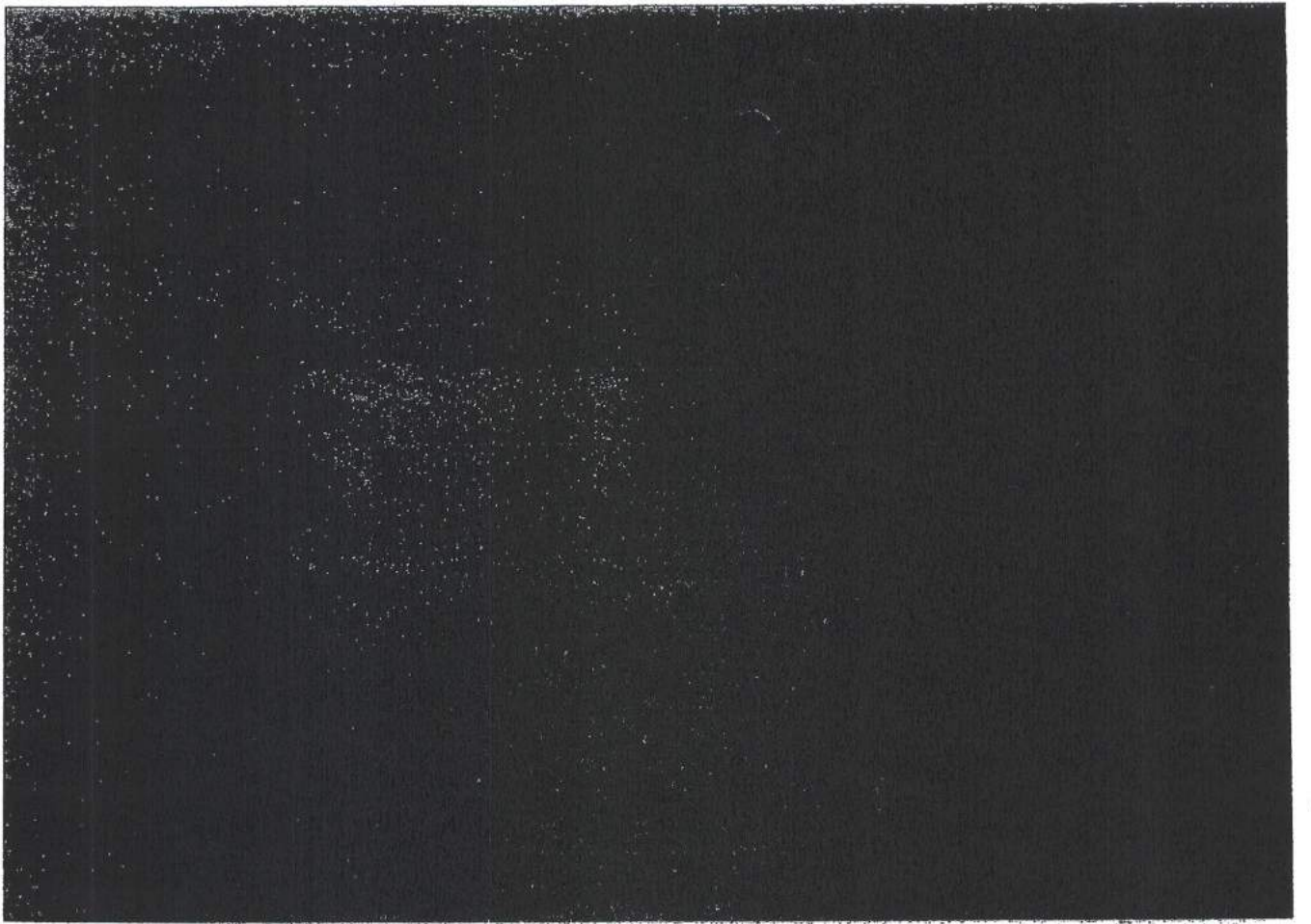
Postage \$ 0.47

Total Postage and Fees \$ 6.67



Sent to Philip B. Stone and/or Occupants
Street and Apt. 28437 N. 112th Way
City, State, ZIP Scottsdale, AZ 85262

7017 1450 0001 8771 3516



ZIEVE, BRODNAX & STEELE, LLP

Joseph J. Tirello, Jr., Esq., Attorneys at Law
3550 North Central Avenue, Suite 625
Phoenix, AZ 85012

October 22, 2018

Certified Mail Return Receipt
And by Regular First Class Mail

NOTICE TO VACATE (File No. 18004751)

TO: PHILIP B. STONE all tenants, subtenants, and others in possession.

ADDRESS: 28437 N. 112TH WAY
SCOTTSDALE, AZ 85262

The above-referenced real property ("Property") was sold at a foreclosure sale in accordance with the laws of the State of Arizona under a power of sale contained in a deed of trust securing said Property, and title pursuant to the sale has been duly perfected with our client. The new owner seeks to recover possession of the Property in good faith to market and sell the Property.

Within **five (5) days** after service of this notice, you are hereby required to vacate and deliver possession of the Property now held and occupied by you to the undersigned unless you are a tenant or subtenant who rented the Property prior to the date of notice of the foreclosure sale.

PLEASE TAKE NOTICE: Pursuant to the Protecting Tenants of Foreclosure Act ("PTFA") you might have additional protections and/or rights to remain in the subject property. Please contact our office immediately if you are a tenant in the property for additional review. However, if you are a tenant or subtenant who rented the Property after the date of notice of the foreclosure sale, then you must vacate the Property. You may have additional time, at the owner's discretion, to remain in the Property if you are a tenant who entered into a bona fide lease prior to the notice of foreclosure.

Generally, a lease is considered bona fide only if all of the following conditions exist: (1) you are not the mortgagor (the prior owner/borrower) or the child, spouse, or parent of the mortgagor; (2) your lease was the result of an arms-length transaction; and (3) the lease requires the receipt of rent which (i) is not substantially less than fair market rent for the Property or (ii) the Property's rent is reduced or subsidized due to a federal, state or local subsidy.

If you claim to be a tenant or subtenant, within three days after service of this notice, please notify the undersigned in writing of your tenancy and provide the undersigned with the following

Zieve, Brodnax & Steele, LLP
Joseph J. Tirello, Jr., Esq.
3550 North Central Avenue, Suite 625
Phoenix, AZ 85012
Phone: (602) 282-6188
Fax: (602) 865-8086
jtirello@zbslaw.com

information: (a) a copy of your lease or rental agreement, or if you do not have a written lease or rental agreement, please provide a written explanation of the terms of the agreement under which you occupy the Property, including without limitation, the date you entered into the agreement, the names of all parties who entered into the agreement, the term of the agreement, the amount of monthly rent, the utilities paid by the landlord (if any), the amount of your security deposit (if any), and whether you receive assistance under the Department of Housing and Urban Development's Section 8 Housing Program; (b) proof of your last rental payment and any security deposit; (c) a list of any conditions at the Property that require repair; and (d) whether you are the child, spouse, or parent of the mortgagor.

Further, if you have been negotiating for or have entered into an agreement in which you will voluntarily vacate the Property by an agreed upon date (sometimes called "cash for keys"), be advised this letter is not intended to alter or terminate that agreement. If an agreement has been completed, please provide an executed copy to our offices so we can account for the terms of the agreement in our subsequent actions. If you have not completed negotiations but are still actively seeking to reach an agreement, please provide contact information for the party with whom you are negotiating.


ATTENTION! Are you an active service member of the armed forces, or the dependent of one? If so then you MAY be afforded additional rights under the SERVICEMEMBERS CIVIL RELIEF ACT (SCRA). Please contact our office at (602)282-6188 immediately to determine if the protections of SCRA apply to you.

*****Be prepared to provide proof of military service.*****

For information regarding this notice, please call (602) 282-6188.

If you have any questions about this matter, please do not hesitate to contact our eviction department.

Respectfully,



Joseph J. Tirello, Jr.

Attorneys for Plaintiff

This is an attempt to collect a debt. Any information obtained will be used for that purpose.

Zieve, Brodnax & Steele, LLP
Joseph J. Tirello, Jr., Esq.
3550 North Central Avenue, Suite 625
Phoenix, AZ 85012
Phone: (602) 282-6188
Fax: (602) 865-8086
jtirello@zbslaw.com