

## FRAUD REPORT & REFUND DEMAND: POLICY LP4698B2C84 // VOID LEASE 5634 NOEL DR

1 message

**Eric B Jones** <eric@recovery-compass.org>  
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Cc: Gary Kearney <gwkearney@outlook.com>

Fri, Jan 16, 2026 at 3:51 PM

Lemonade Legal & Compliance Team,

I am in receipt of the cancellation notice for Policy LP4698B2C84.

Please be advised that the underlying lease for the insured premises (5634 Noel Drive, Temple City, CA) has been identified as VOID AB INITIO. The landlord, Gary W. Kearney (CC'd here), rented an unpermitted "Ghost Unit" in violation of Temple City Municipal Code 9-1E-2 (Illegal Density/Parking).

Because the lease is void under California law (*Espinoza v. Calva*), I held no valid insurable interest in the property during the policy term. I was fraudulently induced by the Landlord to purchase Policy LP4698B2C84 for an illegal dwelling.

1. REPORT OF MISREPRESENTATION: The policy was procured based on the Landlord's misrepresentation of the property's habitability and legal status. 2. DEMAND FOR FULL REFUND: As the policy was void from inception due to the illegality of the contract, I request a full refund of ALL premiums paid from May 2023 to present. 3. LIABILITY: Please direct any subrogation claims or administrative inquiries regarding this void tenancy to Mr. Gary Kearney (SBN 71443).

This correspondence is being entered into the evidence log for pending litigation (Jones v. Kearney).

Eric B. Jones  
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