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2 *1515 2nd Ave*
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7 **IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT**
8 **FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY**

DPW Enterprises LLC and Mountain Prime 2018
LLC,

Plaintiff,

vs.

Jeremy L. Bass, Dwayne Pike, and Current
occupant, and Unknown Parties in
Possession of the real property commonly
known as 1515 21st Avenue, Lewiston,
Idaho 83501

Defendants.

Case No. CV35-24-1063

**AFFIDAVIT OF JEREMY L. BASS
IN SUPPORT OF DEFENDANT'S RESPONSE
TO PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT**

DEMAND FOR JURY

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11 COMES NOW Plaintiff, JEREMY L. BASS, AND PROVIDES THIS AFFIDAVIT OF JEREMY L. BASS IN
12 SUPPORT OF DEFENDANT'S RESPONSE TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT in
13 regards to his knowledge of events and everything he believes to be true regarding pleading for
14 the proceedings over the property located at **1515 21ST AVE. LEWISTON ID 83501-3926** (hereinafter
15 "THE PROPERTY" or "HOUSE" fully described in further reading). The reason for this affidavit is to
16 help meet the page limits defined in District Local Rule Civ 7.1 (Civil) [v. 4] .

17 I, Jeremy L. Bass, Pro Se, hereby makes the following statements of fact as to his personal
18 knowledge and attests the same to be true to the best of his knowledge, being first duly sworn
19 on oath, depose and state as follows:

- 20 1. I am the Defendant in the case DPW Enterprises LLC and Mountain Prime 2018 LLC vs.
21 Jeremy L. Bass, Dwayne Pike, et al., Case No. CV35-24-1063, in the District Court of the
22 Second Judicial District for the State of Idaho in and for Nez Perce County.

2. I am the lawful owner of the property located at 1515 21st Avenue, Lewiston, Idaho 83501, and I am proforce pro se in this matter.

3. I submit this affidavit in support of my Response to Plaintiffs' Motion for Summary Judgment, to introduce and authenticate evidence supporting my claims that the auction of my property was rigged, fraudulent, and procedurally invalid.

4. The following evidence is relevant to demonstrating bid manipulation, collusion, and irregularities in the auction process:

a. Exhibit A: Facebook Messenger Chat Log a. A series of messages exchanged between myself and Glenda Morlan from May 19, 2023, to June 2, 2023, via Facebook Messenger. In these messages, Ms. Morlan makes repeated attempts to coerce me into selling my property to her and discloses information about the rigged nature of the auction.

i. Chat Log Document: The chat log is attached as chat log.md.

ii. Key Messages: Ms. Morlan warns about the foreclosure auction and attempts to pressure me into a sale before the rigged auction could take place, stating:

1. "The mortgage company will buy it... and then auction it off again to recap all expenses."

2. "Right now, your only chance to get out without a foreclosure... is to do a quick sell and because of time it will have to be cash."

[Relevant Section: Exhibit B from Response to MSJ, pages X-Y.]

[File Reference: chat log.md]

b. Exhibit B: Transcript of Recorded Audio Call a. A recorded conversation between myself and Glenda Morlan, a local property developer, on June 2, 2023, via Meta's

Messenger app. This conversation discusses irregularities in the foreclosure process and intimidation tactics used to coerce me into selling my property.

i. Transcript: A full transcription of this conversation is attached, titled 230602_0285.mp3 transcript.md.

ii. Original Audio: The audio file is labeled 230602_0285.mp3.

[Relevant Section: Response to MSJ, pages X-Y.]

[File Reference: 230602_0285.mp3 transcript.md]

c. Exhibit C: Video Evidence of the Auction a. A series of video recordings taken on February 29, 2024, during the foreclosure auction. These recordings show the absence of competitive bidding and collusive behavior by the Plaintiffs and their representatives.

i. Video Files:

1. 20240229_110157.mp4

2. 20240229_110252.mp4

3. 20240229_110654.mp4

[Relevant Section: Response to MSJ, pages X-Y.]

[File Reference: Video files located under *E:_GIT\obsidian\BoA timeline\proceedings\parties\after sale\defendant\2024-09-23\evidence\The rigged auction*]

5. I assert that this evidence demonstrates that the Plaintiffs were aware of defects in the auction process and that the auction was not conducted in good faith, as required under **Idaho Code § 45-1508**. Specifically, the Plaintiffs' knowledge of title defects, irregularities in the foreclosure process, and their participation in a pre-arranged, collusive auction precludes them from claiming bona fide purchaser status.

1 6. I respectfully request that the Court deny Plaintiffs' Motion for Summary Judgment and
2 allow this case to proceed to trial, where these material issues of fact can be resolved.

3 7. Attached to this affidavit are true and correct copies of the evidence referenced above.

4 FURTHER AFFIANT SAYETH NAUGHT.

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Dated this 15 day of October 2024.

Respectfully submitted,
Jeremy L. Bass
Defendant/ Pro Se

Signature

CERTIFICATE OF MAILING

I certify that I have sent by email and/or first-class mail this DEFENDANT BASS' RESPONSE TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT to Plaintiffs on October 15th, 2024, at the following email address and postal address:

Email: lewis@hwmlawfirm.com
Postal: Lewis N. Stoddard, Bar No. 7766
Halliday, Watkins & Mann, P.C.
376 East 400 South, Suite 300
Salt Lake City, UT 84111

Ken Nagy
Idaho Legal Aid Services, Inc.
Email: kennagy@idaholegalaid.org
Counsel for Dwayne Pike

Jeremy L. Bass
Defendant

Signature

ACKNOWLEDGMENT

STATE OF IDAHO)

: ss.

County of NEZ PERCE COUNTY)

On the _15_ day of __October__, 2024, before me, the undersigned Notary Public, personally appeared __Jeremy Bass__, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that s/he executed the same.

IN WITNESS WHEREOF, I have set my hand and seal the day and year as above written.

Notary Public for Idaho

Residing at _____

Commission Expires: _____

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