

1 *Jeremy L. Bass, Pro Se*  
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6  
7 **IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT**  
8 **FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY**

JEREMY L. BASS,

Plaintiff,

vs.

BANK OF AMERICA, N.A.,  
CARRINGTON MORTGAGE SERVICES, LLC,  
RECONTRUST COMPANY, N.A.,  
Randall Szabo, c/o IDEA Law Group, LLC,  
MICHAEL J. NEWELL, c/o IDEA Law Group, LLC,  
DOE I-X

Defendants.

Case No. CV35221875

**AFFIDAVIT IN SUPPORT OF  
COMPLAINT  
– DEFENDANT DETAILS**

**DEMAND FOR JURY**

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10  
11 COMES NOW Plaintiff, JEREMY L. BASS, AND PROVIDES THIS AFFIDAVIT IN SUPPORT OF THE  
12 COMPLAINT AND MOTIONS in regards to his knowledge of the details of the defendants and  
13 reasons of inclusion or not. The reason for this affidavit is to help meet the page limits defined in  
14 District Local Rule Civ 7.1 (Civil) [v. 4] .

15 I, Jeremy L. Bass, Pro Se, hereby makes the following statements of fact as to his personal  
16 knowledge and attests the same to be true to the best of his knowledge:

- 17 1. Defendant BANK OF AMERICA CORPORATION. (hereinafter "BAC" or Defendants) declared  
18 as an institution type of "Financial Holding Company – Domestic" with primary activity  
19 declared as "OFFICES OF BANK HOLDING COMPANIES", *FFIEC*

- 20 a. BAC is named in this complaint a they have held claim of beneficiary and are the  
21 parent company of many of the other parties involved or having an influence

1 over a party involved, making them one in the same as BoA, ReconTrust,  
2 CountryWide, MERS, Carrington, and others.

3 b. BAC was formed in Delaware.

4 2. Defendant RECONTRUST COMPANY, N.A. (hereinafter "ReconTrust," "RT," or Defendants)  
5 was a for-profit business entity permitted by the U.S. Office of the Comptroller of the  
6 Currency as a non-depository, uninsured, limited-purpose national trust bank.

7 a. RT is named despite its non-existence as it was a party set up as it's own, even  
8 though BAC is ultimately the party that will be looked at for RT's actions.

9 b. It appears ReconTrust was wholly owned by BoA.

10 c. RT was a California corporation and was a wholly-owned subsidiary of BoA.

11 d. RT foreclosed loans are serviced by BoA and its wholly-owned subsidiary, BAC  
12 Home Loans Servicing, L.P.

13 e. ReconTrust was acting as a foreclosure trustee in the State of Idaho.

14 f. Foreclosure trustees are responsible for conducting nonjudicial foreclosures,  
15 called Trustee's sales, in accordance with *Idaho Code § 45-1505* and the terms of  
16 the mortgage transaction documents.

17 g. "Trustee" means a person to whom title to real property is conveyed by a trust  
18 deed or his successor in interest for the limited purpose of the power of sale.

19 *Idaho Code § 45-1502*

20 h. Assignment as Trustee was purportedly given on 2009-11-02 through Substitution  
21 of Trustee recorded as instrument number 775251, as shown in EXHIBIT S.

22 3. The "Trustee" who has the power to proceed with actions that can injury THE PROPERTY  
23 and Mr. Bass.

24 a. It was said for the "trustee to have all the powers, effective forthwith."

1 b. Michael J. Newell, c/o IDEA Law Group, LLC, ESQ. (hereinafter "Mr. Newell") was  
2 the individual from IDEA Law Group acting as a trustee on behalf of BoA  
3 concerning the sale of THE PROPERTY.

4 i. Mr. Newell was the Trustee named by BoA, underpinning his inclusion in  
5 the complaint being that he was trying to conduct a sale of THE  
6 PROPERTY, and the TRO would be put to him as he can act independently  
7 if not named directly.

8 ii. Mr. Newell has been replaced, but he is still named due to his statements  
9 within the court and his activities.

10 iii. On 2022-08-02, Mr. Newell purportedly was named Trustee by the  
11 undersigned Ami Bhavsar, the Foreclosure Services Manager from BoA by  
12 Carrington as servicer and attorney-in-fact recorded with the Nez Perce  
13 County Clerk/Auditor/Recorder office (hereinafter "COUNTY" or "COUNTY  
14 RECORDER") as Instrument Number 902078 shown in EXHIBIT P pg. 1.

15 iv. Mailing address 4100 E. Mississippi Avenue, Suite 420, Denver, CO 80246  
16 is the most prominent used address presented when called for contact  
17 information, shown in EXHIBIT N pg. 1,3,6,11, in EXHIBIT O pg. 1, in EXHIBIT  
18 P pg. 1, and many others.

19 v. NOTICE OF APPOINTMENT NOT BEING SENT. NO CAUSE OF WHY THE  
20 TRUSTEE WAS REPLACED

21 c. Randall Szabo (hereinafter "Mr. Szabo"), the individual from IDEA Law Group, is  
22 the current purported Trustee acting on the will of BoA

23 i. Mr. Szabo was recorded at Trustee on 2023-03-09 with THE COUNTY  
24 shown in Exhibit AR.

1                   ii. Mr. Szabo has been named here as he has taken on the role of Trustee

2           4. Carrington Mortgage Services (hereinafter "Carrington") is a servicing company and  
3           attorney-in-fact for BoA.

4               a. There are no Records of when they started to act as if they were the Trustee

5               b. It appears Carrington is owned by BoA.

6               c. Carrington is not listed anywhere as far as being the active Trustee.

7               d. Carrington does not have a physical location in Idaho which goes against the  
8               statute for doing business in the state of Idaho per *Idaho Constitution Article XI*  
9               *Section 10 Idaho Const. art. XI, § 10.*

10          5. Unknown Parties (hereinafter "DOE")

11           a. At this time, there are hints of other parties that may or may not be considered  
12           indispensable.

13           b. Parties will be added or dropped as it's required or on leave of the court, and a  
14           list of people identified is shown in Exhibit AS

15  
16          Dated this 30 day of March 2023.

Respectfully submitted,  
Jeremy L. Bass  
Plaintiff/ Pro Se

\_\_\_\_\_  
Signature

CERTIFICATE OF MAILING

I certify that I have sent by email and first-class mail this OPPOSITION TO DEFENDANT'S MOTION TO DISMISS AND STRIKE SUMMONS AND COMPLAINT to Defendants on March 30th, 2023, at the following email address and postal address:

Email: mnewell@idealawgroupllc.com  
Postal: Michael J. Newell ISBA #1953  
IDEA Law Group, LLC  
4530 S. Eastern Ave., Ste. 10  
Las Vegas, NV 89119

Postal: Randall Szabo #10901  
IDEA Law Group, LLC  
4530 S. Eastern Ave., Ste. 10  
Las Vegas, NV 89119

Postal: BANK OF AMERICA, N.A  
C T CORPORATION SYSTEM  
1555 W SHORELINE DR  
STE 100  
BOISE, ID 83702

Postal: CARRINGTON MORTGAGE SERVICES  
C T CORPORATION SYSTEM  
1555 W SHORELINE DR  
STE 100  
BOISE, ID 83702

Jeremy L. Bass  
Plaintiff

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Signature

**ACKNOWLEDGMENT**

STATE OF IDAHO )

: ss.

County of NEZ PERCE COUNTY )

On the \_21\_ day of \_\_FEBRUARY\_\_, 2023, 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: \_\_\_\_\_