*Jeremy L. Bass, Pro Se*

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**IN THE DISTRICT COURT FOR THE SECOND JUDICIAL DISTRICT**

**FOR THE STATE OF IDAHO, IN AND FOR NEZ PERCE COUNTY**

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| 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** |

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

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

1. I am the Defendant in the case DPW Enterprises LLC and Mountain Prime 2018 LLC vs. Jeremy L. Bass, Dwayne Pike, et al., Case No. CV35-24-1063, in the District Court of the 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:
   1. 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.
      1. Chat Log Document: The chat log is attached as chat log.md.
      2. 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]
   2. 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.
      1. Transcript: A full transcription of this conversation is attached, titled 230602\_0285.mp3 transcript.md.
      2. 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]
   3. 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.
      1. 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.
6. I respectfully request that the Court deny Plaintiffs' Motion for Summary Judgment and allow this case to proceed to trial, where these material issues of fact can be resolved.
7. Attached to this affidavit are true and correct copies of the evidence referenced above.

FURTHER AFFIANT SAYETH NAUGHT.

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:

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| --- | --- |
| 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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_