*Jeremy L. Bass, Pro Se*

*1515 21st Ave*

*Lewiston, ID 83501-3926*

*Ph: 208-549-9584*

*Quantum.J.L.Bass@RAWdeal.io*

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

**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** |

COMES NOW Plaintiff, JEREMY L. BASS, AND PROVIDES THIS AFFIDAVIT IN SUPPORT OF THE COMPLAINT AND MOTIONS in regards to his knowledge of the details of the defendants and reasons of inclusion or not. 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:

1. Defendant BANK OF AMERICA CORPORATION. (hereinafter "BAC" or Defendants) declared as an institution type of "Financial Holding Company – Domestic" with primary activity declared as "OFFICES OF BANK HOLDING COMPANIES", *FFIEC*
   1. BAC is named in this complaint a they have held claim of beneficiary and are the parent company of many of the other parties involved or having an influence over a party involved, making them one in the same as BoA, ReconTrust, CountryWide, MERS, Carrington, and others.
   2. BAC was formed in Delaware.
2. Defendant RECONTRUST COMPANY, N.A. (hereinafter "ReconTrust," "RT," or Defendants) was a for-profit business entity permitted by the U.S. Office of the Comptroller of the Currency as a non-depository, uninsured, limited-purpose national trust bank.
   1. RT is named despite its non-existence as it was a party set up as it's own, even though BAC is ultimately the party that will be looked at for RT's actions.
   2. It appears ReconTrust was wholly owned by BoA.
   3. RT was a California corporation and was a wholly-owned subsidiary of BoA.
   4. RT foreclosed loans are serviced by BoA and its wholly-owned subsidiary, BAC Home Loans Servicing, L.P.
   5. ReconTrust was acting as a foreclosure trustee in the State of Idaho.
   6. Foreclosure trustees are responsible for conducting nonjudicial foreclosures, called Trustee's sales, in accordance with *Idaho Code § 45-1505* and the terms of the mortgage transaction documents.
   7. "Trustee" means a person to whom title to real property is conveyed by a trust deed or his successor in interest for the limited purpose of the power of sale. *Idaho Code § 45-1502*
   8. Assignment as Trustee was purportedly given on 2009-11-02 through Substitution of Trustee recorded as instrument number 775251, as shown in EXHIBIT S.
3. The "Trustee" who has the power to proceed with actions that can injury THE PROPERTY and Mr. Bass.
   1. It was said for the "trustee to have all the powers, effective forthwith."
   2. Michael J. Newell, c/o IDEA Law Group, LLC, ESQ. (hereinafter "Mr. Newell") was the individual from IDEA Law Group acting as a trustee on behalf of BoA concerning the sale of THE PROPERTY.
      1. Mr. Newell was the Trustee named by BoA, underpinning his inclusion in the complaint being that he was trying to conduct a sale of THE PROPERTY, and the TRO would be put to him as he can act independently if not named directly.
      2. Mr. Newell has been replaced, but he is still named due to his statements within the court and his activities.
      3. On 2022-08-02, Mr. Newell purportedly was named Trustee by the undersigned Ami Bhavsar, the Foreclosure Services Manager from BoA by Carrington as servicer and attorney-in-fact recorded with the Nez Perce County Clerk/Auditor/Recorder office (hereinafter "COUNTY" or "COUNTY RECORDER") as Instrument Number 902078 shown in EXHIBIT P pg. 1.
      4. Mailing address 4100 E. Mississippi Avenue, Suite 420, Denver, CO 80246 is the most prominent used address presented when called for contact information, shown in EXHIBIT N pg. 1,3,6,11, in EXHIBIT O pg. 1, in EXHIBIT P pg. 1, and many others.
      5. NOTICE OF APPOINTMENT NOT BEING SENT. NO CAUSE OF WHY THE TRUSTEE WAS REPLACED
   3. Randall Szabo (hereinafter "Mr. Szabo"), the individual from IDEA Law Group, is the current purported Trustee acting on the will of BoA
      1. Mr. Szabo was recorded at Trustee on 2023-03-09 with THE COUNTY shown in Exhibit AR.
      2. Mr. Szabo has been named here as he has taken on the role of Trustee
4. Carrington Mortgage Services (hereinafter "Carrington") is a servicing company and attorney-in-fact for BoA.
   1. There are no Records of when they started to act as if they were the Trustee
   2. It appears Carrington is owned by BoA.
   3. Carrington is not listed anywhere as far as being the active Trustee.
   4. Carrington does not have a physical location in Idaho which goes against the statute for doing business in the state of Idaho per *Idaho Constitution Article XI Section 10 Idaho Const. art. XI, § 10.*
5. Unknown Parties (hereinafter "DOE")
   1. At this time, there are hints of other parties that may or may not be considered indispensable.
   2. Parties will be added or dropped as it's required or on leave of the court, and a list of people identified is shown in Exhibit AS

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

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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_