

CV30 MISSING

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<p align="center">FILED CLERK, U.S. DISTRICT COURT</p> <p align="center">7/2/22</p> <p align="center">CENTRAL DISTRICT OF CALIFORNIA</p> <p align="center">BY: <u>EEE</u> DEPUTY</p>
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NICHOLAS PHIPPS WHITE
324 South Beverly Drive, Suite 489
Beverly Hills, CA 90212
(415) 539-6760

NICHOLAS PHIPPS WHITE, IN PRO PER

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

NICHOLAS PHIPPS WHITE, a California
Resident

Plaintiff,

vs.

ANYWHERE REAL ESTATE INC., parent
company of WEST COAST ESCROW
COMPANY. a domestic Corporation,

Defendant.

COMPLAINT: FRAUD

DEMAND FOR JURY TRIAL

2:22-CV-04557-GW(MAAx)

THE PARTIES

1. The Plaintiff, Nicholas Phipps White, as an individual and the true party of interest in 594 South Mapleton Drive, Los Angeles, CA known as the "Spelling Manor"(APN:4359-013-032) , is collectively referred to herein as ("Plaintiff") Plaintiff, Nicholas Phipps White, is and at all times relevant to this action and has been a resident of the State of California since 2017. The Plaintiff is 53-year old Mr. Nicholas Phipps White, husband of 52-year old Mirga Phipps White MBA, married on July 21, 2010 and the Plaintiff's Attorney-in-fact and Executor and sole heir. Plaintiff and wife have no children, is a U.S. citizen and a resident of California since 2017 and the Chairman and CEO of The Hollywood Land Development Company LLC with his principal place of business in the County of Los Angeles. The company is non-partisan and is incorporated in the State of California.

2. The Plaintiff is the 100% percent owner of The Hollywood Land Development Company, LLC and the 100% owner of the California based "Sovereign Towers" project. Sovereign Tower I was to feature an 800-room Marriott dual-branded Ritz-Carlton/St Regis luxury hotel sold to The Kingdom Saudi Arabia Public Investment Fund. The funds for

1 the purchase of the 594 South Mapleton Drive, Los Angeles, CA 900045, were issued to the Plaintiff via a U.S.
2 government Treasury check, however where and deposited at Bank of America/Merrill Lynch by an actress and disgraced
3 reality performer, Erika Girardi, wife of Tom Girardi, who is a disbarred lawyer as well. Mr. Girardi was posing as
4 Nicholas Phipps White's father, and the Defendant West Coast Escrow were aware of the massive fraud of both Tom and
5 Erika Girardi, who was posing as the wife, widow and Administrator of Mr. Nicholas Phipps White.

6
7 3. They Bank of America/Merrill Lynch account consisted of forged and fraudulent documents that were accepted
8 by FDIC-institution. West Coast Escrow Company located at 222 North Canon Street, #203, Beverly Hills, CA 90212 as
9 the largest escrow company in California, whose parent company Anywhere RE Inc. (NYSE: HOUS) formerly Realogy
10 (NYSE: RLGY) which owns West Coast Escrow and Coldwell Banker Realty, had an obligation know their customer
11 (the alleged anonymous buyer in this case) and had deep knowledge of the massive premeditated fraud scheme. West
12 Coast Escrow Company knowingly accepted fraudulent, illegitimate, LLC documents from a fraudulent "594 Mapleton
13 LLC" and a manufactured "Erika White" who in 1998 met her husband disgraced Tom Girardi steps away from West
14 Coast Escrow on 246 North Canon Drive with now deceased 76-year old Jeff Hyland of Hilton and Hyland at 257 North
15 Canon Drive and finally, 75 year old Jade Mills of Coldwell Banker Realty on 301 North Canon Drive. The Defendants
16 know her as an actress and disgraced reality performer by the name of Erika Girardi. The Defendants had a duty to care
17 to their customer and the Plaintiff in alerting him about an "Erika White" fraudulently posing as his Administrator. The
18 Defendants had actual knowledge of the fraud and chose to remain silent because of a financial gain .West Coast Escrow
19 Company fraud resulted in unfair and undeserved benefit for them, and caused a loss or harm to another person/

20 4. The Plaintiff is the owner of 594 South Mapleton Drive, Los Angeles, CA 90045 which was purchased without
21 his knowledge on July 2, 2019 from his *Palm Beach County Sheriff's Office for the Benefit of Nicholas Phipps White*
22 *global account XXX-X3284*. These are to include any related accounts of Nicholas Phipps White that have his signature
23 and had been confirmed by multiple Bank of America/Merrill Lynch personnel that the Defendants had allowed fraudulent
24 letters of administration of probate and death certificate be put on by 50-year old disgraced, actress Erika Girardi, wife of
25 disbarred attorney 82-year old Tom Girardi. Bank of America watched the crime take place and allowed him to pose as
26 Nicholas Phipps White's father, by accepting a fraudulent passport from the Italian Consulate in San Francisco that was
27 used to open this Merrill Lynch tax-free global account. Bank of America/Merrill Lynch allowed 82-year old Tom
28 Girardi's social security number of XXX-XX-5134 be falsely used to substitute for 53-year old Nicholas Phipps White's

1 social security number. The Defendant have acted negligently and aided and abetted the massive fraud scheme, which
2 has prevented the Plaintiff, their customer, from accessing his home at 594 South Mapleton Drive, Los Angeles, CA
3 90045 since July 2, 2019 due to their error. The money for the purchase of his home was illicitly transferred from Bank
4 of America Merrill Lynch global account which now has more than 25 unauthorized debit cards are currently in use on
5 the Plaintiffs consumer account. The Defendant’s actions allowed the actress and disgraced reality performer, Erika
6 Girardi, posing as “Erika White” to now serve as the Administrator of Probate of the “Estate of Nicholas White” and the
7 Plaintiff has not had one day in his house on 594 South Mapleton Drive, Los Angeles, CA 90045 heinously purchased on
8 his 52 year old wife’s Mirga Phipps White’s birthday, of July 2, 2019.

9 5. Anywhere Real Estate Inc. West Coast Escrow Company 222 North Canon Drive, #203, Beverly Hills, CA
10 90210 and Coldwell Banker Realty are, and at all times relevant to this action was, its principal place of business in the
11 County of Los Angeles, the Western U.S. District of California with West Coast Escrow Officer and Manager Minny Ng
12 of Beverly Hills, CA since 2005.

13
14 **JURISDICTION AND VENUE**

15 6. This Court has personal jurisdiction over the Anywhere Real Estate Inc’s West Coast Escrow Company and
16 Coldwell Banker Realty of because they maintain offices and/or regularly conduct business in the State of California,
17 and/or reside in the State of California. The Defendant entered into the relationship with the Plaintiff in California.
18 Furthermore, the Defendant entered into the contracts that are the subject of this action, engaged in fraudulent acts in the
19 State of California and/or conspired with other defendants in the State of California, and the contractual duties and
20 obligations under the contracts were to be performed in the State of California, including in the county of Los Angeles,
21 Central District of California U.S. Federal Court.

22
23 7. The Venue is proper in this Federal judicial district, the Defendant contracted to perform obligations in this
24 district, the contracts were also entered into in this district. The Defendant committed aided and abetted massive fraud,
25 scheme, and unconscionable tortious acts in this district by not only acting as his escrow agent for Nicholas Phipps White
26 for the transaction of 594 South Mapleton Drive, Beverly Hills, CA 90045, previous called the “Spelling Manor” but also
27 shamelessly recognizing an actress and disgraced reality tv performer as his fictitious wife by the name of “Erika White”
28 as his wife and her husband disbarred attorney, Tom Girardi as the Plaintiff’s fraudulent attorney-in-fact. The Defendants

1 had the intention to deceive and defraud Nicholas Phipps White in order to get gains and fees from the \$119,750,000
2 transaction on July 2, 2019 whereby the source of funds for the Spelling Manor transaction were his stolen settlement and
3 to share the wealth between the different parties. It is also fair to note that Nicholas Phipps White is the great grandson
4 of U.S. Senator Lawrence Phipps White.

5 **GENERAL ALLEGATIONS**
6

7 8. Defendant Anywhere Real Estate Inc.’s West Coast Escrow located on 222 North Canon Drive, Suite 203,
8 Beverly Hills, CA 90210 July 2, 2019, specifically Minnie Ng the West Coast Title Office on this transaction knowingly
9 accepted wired funds for the purchase of 594 South Mapleton Drive, Los Angeles, CA 90045 located in the County of
10 Los Angeles (APN:4359-013-032) from the Bank of America Merrill Lynch global account of Nicholas Phipps White
11 that was negligently opened by Bank of America/Merrill Lynch on or about June 7, 2019, the Defendants allowed two
12 family members of disbarred and disgraced former attorney Tom Girardi, Erika Girardi, and her son Tommy Zizzo, to
13 impersonate California residents Chairman and CEO Mr. Nicholas Phipps White and his spouse Mrs. Mirga Phipps White
14 MBA.

15 9. The Defendant Anywhere Real Estate Inc.’s West Coast Escrow failed to capture the identity theft that occurred
16 on July 2, 2019 and report to it law enforcement to get in contact with Mr. Nicholas Phipps White living in Beverly Hills,
17 California that such a transaction was occurring. The Defendants were aware that a global account where the 594 South
18 Mapleton, Los Angeles, CA 90045 purchase was coming from was a global account “whereby the IRS has no
19 jurisdiction.” The Defendant allowed the identity theft disguised as a birthday gift for his actual wife Mirga Phipps White
20 MBA born in July 2, 19XX. In fact, the only two legitimate accounts that were personally opened by the Chairman and
21 CEO Mr. Nicholas Phipps White in California was later suddenly closed in an effort to limit the Plaintiff’s access to any
22 further accounts or for him to discover the fraudulent letters of administration and the death certificate that was accepted
23 by the Defendants on the account in Florida. Till this day, Nicholas White has not seen one dollar of his settlement or live
24 in the 594 South Mapleton Drive, Los Angeles, CA 90045 home he purchased on July2, 2019 without his knowledge due
25 to West Coast Escrow Company, who served as the Escrow Agent.

26
27 10. The Plaintiff residing in Beverly Hills, California the day of, was all a while unaware of the purchase of the
28 purchase of the massive 50,000 “Spelling Manor” which he has never had access to however, Tom and Erika Girardi and

1 their friends, associates, and politician friends continued to use the Spelling Manor. On June 7, 2021, the Plaintiff filed
2 the negligence civil complaint and on July 2, 2021, the Bank of America Merrill Lynch were served with a Negligence
3 Business Tort Claim in Miami-Dade County for the return in the amount of \$27,829,774,612 in Nicholas Phipps White
4 vs. Bank of America, N.A. Merrill Lynch Case No.: 2021-013813-CA-01. Bank of America accepted fraudulent Letters
5 of Administration of an “Erika White” being designated by the Court. Whereby the Defendant had direct, in-depth
6 knowledge of the fraud and aided and abetted Erika Girardi, an actress and disgraced reality performer, posing as the wife
7 of Mr. Nicholas Phipps White, Chairman and CEO.

8 11. On May 6, 2021 California Secretary of State records show West Coast Escrow’s CEO and President E. Neil
9 Gulley 02-04-21 through 04-20-2012 is removed and current West Coast Escrow Company CEO and President Patrick
10 Frasier is installed, holding company is Realogy Holdings Corp. now Anywhere RE Inc. The former President E. Neil
11 Gulley is still with a branch of West Coast Escrow that registered on July 9, 2021 with the Secretary of State in
12 Massachusetts.

13 12. On October 8, 2021, Mr. Nicholas Phipps White provided Attorney General Merrick Garland evidence of a
14 picture of Erika Girardi posing as a 35-year old “Erika White” and fabricated wife and fraudulent Administrator of the
15 Estate of Nicholas White, after which led to one of the largest financial management shakeups announced by Bank of
16 America CEO Brian Moynihan on October 10, 2021.

17 13. On October 20, 2021, it was confirmed that Bank of America’s Estate Services had Mr. Nicholas Phipps White’s
18 profile as still alive. Mr. Nicholas Phipps White and his accountant also took the first available appointment with the
19 Operations Manager at the Los Angeles Branch of Merrill Lynch on October 20, 2021. He met Merrill Lynch’s proof of
20 life requirements by properly resending the required two forms of ID in order to clear any doubt that he is deceased as
21 falsely claimed by Bank of America Merrill Lynch.

22 14. On February 12, 2022, the Defendant is aware that the 594 South Mapleton Drive, Los Angeles, CA 90045
23 property West Coast Company transaction from July 2, 2019 is put on sale and the “mysterious buyer” Nicholas Phipps
24 White is again represented by the now deceased Jeff Hyland of Hilton & Hyland who abruptly passes away February 16,
25 2022, only four days after serving as the “anonymous buyer from July 2, 2019” agent.
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1 15. On March 22, 2022 the Defendant received the letter to Attorney General Garland documenting the massive
2 fraud at Bank of America Merrill Lynch regarding the Sovereign Towers settlement case in the amount of
3 \$27,459,774,612. Nicholas Phipps White being the 100 percent owner of the home. In addition, Tom Girardi, who has
4 recently been disbarred, posed as Nicholas Phipps White’s power of attorney. Tom Girardi was also never born in Denver,
5 Colorado, as he has lied about on several occasions. Tom Girardi instead was born in Italy and immigrated to the Unites
6 States in 1957 with now expired immigration papers. Furthermore, Erika Girardi, who posed as an “Erika White”, was
7 also never legitimate, yet Bank of America and Merrill Lynch allowed them to operate and in fact, aided and abetted their
8 fraud scheme on Nicholas Phipps White which resulted in damages of \$27,429,774,612.

9 16. On March 22, 2022 after AG Garland received the letter to DOJ reporting the fraud of an Erika White now
10 attempting to sell and relist the Spelling Manor at 165,000,000 USD, now Erika Girardi pretending to be the Plaintiff’s
11 Administrator of Probate, Hilton and Hyland on behalf of deceased agent Jeff Hyland of Hilton & Hyland removed the
12 listing for 594 South Mapleton Drive, Los Angeles, CA 90045.

13 17. Anywhere Real Estate Inc’s West Coast Escrow Company and Coldwell Banker Realty were aware of massive
14 fraudulent transactions, to include the wire from the Plaintiff’s Merrill Lynch account of #649-13284 of \$119,775,000
15 million dollar purchase by a “Nicholas and Erika White” on or about July 2, 2019 of the more than 55,000 square foot
16 “Spelling Manor” located at 594 South Mapleton Drive, Los Angeles, CA 90003 (Parcel ID: 4359013032). Now deceased,
17 Jeff Hyland of Hilton and Hyland of Beverly Hills, co-founded by Rick Hilton, grandson of hotelier Conrad Hilton, was
18 the agent of record that served as the buyer’s agent for a fake Nicholas Phipps White disguised as an “anonymous Saudi
19 buyer” of the Spelling Manor.
20

21 18. Anywhere Real Estate Inc.’s West Coast Escrow Company and Coldwell Banker Realty had knowledge of the
22 fraud that the “Spelling Manor” property was to be illicitly purchased with \$119,750,000 cash, originally purchased with
23 the Plaintiff’s funds wired from their Merrill Lynch account number 649-13284, recorded on July 2, 2019, in the cash
24 amount of \$119,750.000 for 594 South Mapleton Drive, Los Angeles, CA 90024 (APN: 4359-013-032) Rick Hilton of
25 Hilton and Hyland of 257 North Canon Drive, Beverly Hills, CA 90210. In fact, both the Fidelity National Title of 555
26 Flower Street, Los Angeles, CA 90071, for which Justin Scott served as the Title Officer for Order No. 995-300-31008-
27 JS3 and West Coast Escrow of 222 North Canon Drive, Beverly Hills, CA 90210, for which Minny Ng served as the
28 Escrow Officer for Order No. 4510219-01826MN, the 594 Mapleton LLC agent, attorney Dennis Alan Roach of Clinton

1 Development Inc. and Platinum Financial Management, and others have been notified that the Deed will need to be
2 properly immediately retitled to the sole owner, “Nicholas Phipps White” and be available for pick-up to close the matter.
3 However, on June 3, 2022 Clinton Development Inc. and 594 Mapleton LLC registered agent offices of Mr. Roach which
4 were adorned with multiple pictures of Chinese dictator responsible for the death and confiscation of private property of
5 state-issued portraits of Chairman Mao refused to accept any demand letters at his offices on 9200 Sunset Boulevard,
6 whose lobby directory had been removed. Mr. Roach allegedly manages the Plaintiff’s home but in fact, a New York
7 based (NYSE:ABM) ABM Industries was hired with a Francisco from the New York offices with round the clock security
8 for Tom posing as the Plaintiff’s father and Erika Girardi, posing as Plaintiff’s wife and now widow, associates and
9 political friends paid by the Plaintiff, from his Merrill account for a home Nicholas Phipps White and his wife Mirga and
10 their family have never been able to use.

11 19. On April 5, 2022 the Plaintiff informed Platinum Financial Services that the Plaintiff was motioning for a default
12 judgment of \$27,429,774,612 from Bank of America on the Florida case and requested that the recorded deed for (APN:
13 4359013032) be properly retitled from 594 Mapleton Drive LLC, to Nicholas Phipps White and that the agent of record
14 Los Angeles attorney, Dennis Roach, located at 9200 Sunset Boulevard, Suite 525, Los Angeles, CA 90222 will need to
15 have the newly titled deed and keys to the home bought with funds of the Plaintiff from Bank of America/Merrill Lynch.
16 In addition to 594 Mapleton Drive LLC, Dennis Roach also serves as the agent of record for Clinton Development Inc.
17 company (incorporated 1984) at the 9200 Sunset Boulevard, Suite 525, Los Angeles, CA 90222 and the Holmby Hills
18 Management Inc. who assisted by Susan Kennedy of Holthouse, Carlin, Van Trigt (HCVT) of Los Angeles, who took
19 massive payments for the management of the home from Nicholas Phipps White’s account at Bank of America/Merrill
20 Lynch.

21
22 20. On April 26, 2022 The U.S. Attorney’s Officer in the Central District of California had confirmed that DOJ had
23 accepted the Plaintiff’s Offer in Compromise, whereby, the Sovereign Towers settlement of \$27,459,776,612 was
24 accepted which would consist of: (b) the correction of the Grant Deed from July 2, 2019 of (APN: 4359-013-032) from
25 the street address LLC “594 Mapleton LLC” to “Nicholas Phipps White” and (b) return of the \$27,459,776,612 by Bank
26 of America/Merrill Lynch through their insurance carrier Marsh USA Inc. agent, suspended by the New York State Bar
27 attorney, Richard Damian Brew which was provided by Bank of America’s majority owner Berkshire Hathaway company
28 on or about November 15, 2021.

1 21. On May 20, 2022 a letter to Maurico Umansky of the Agency which included West Coast Escrow Company’s
2 President Frasier. On June 3, 2022 The Agency responded that West Coast Escrow Company would be able to resolve
3 the matter and correct the grant deed from July 2, 2019 sale. On May 27, 2022, The Formal complaints with supporting
4 documentation have been received by the California Department of Real Estate regarding Michael A. Caruso, Mauricio
5 Umansky, Douglas Sandler, David Parnes, James Harris, and Richard H. Hilton. Additionally the California Department
6 of Real Estate received complaints on Coldwell Banker Realty’s Jade Mills and her broker Tony Papillo.

7 22. On June 1, 2022 Formal complaints with supporting evidence have been submitted against West Coast Escrow
8 Company to the U.S. Attorney’s Office of the Central District of California The Honorable Tracy Wilkison, U.S.
9 Attorney’s Office of Delaware The Honorable David Weiss; Attorney General of California The Honorable Rob Bonta
10 and the Los Angeles Police Department (LAPD) The Honorable Sheriff Alex Villanueva; California Bar Office, Chief
11 Trial Counsel of California regarding attorneys: Tom Girardi, Berkshire Hathaway’s Charlie Munger, Caruso Holdings
12 2022 Los Angeles Mayoral Candidate Rick Caruso; Dennis Roach of Clinton Development Inc. formed in 1984, Don
13 Burris, Richard Walden, Philip Holthouse have been received. On June 3, 2022 Nicholas Phipps White emailed West
14 Coast Escrow and Fidelity National Financial, Inc. CEO Michael J. Nolan, who recently replaced on February 1, 2022,
15 former Fidelity National Financial, Inc. CEO Randy convey APN: 4359-013-032 (594 South Mapleton Drive, Los
16 Angeles, CA 90024) to “Nicholas Phipps White” an individual, married, recorded in the atCounty of Los Angeles, CA
17 within five (5) business days.

18
19 23. Anywhere Real Estate Inc.’s West Coast Escrow Company and Coldwell Banker Realty were aware that from
20 Plaintiff’s Merrill Lynch account since 2019, his funds have been illicitly used to pay for this property. As reported by
21 Los Angeles Department of Power and Water, the bill has been as high as \$29,932.70 for electricity that was paid on
22 September 3, 2021 and more recently a bill for \$18,803.59 for electricity paid on January 4, 2022 for a property that he
23 and his wife Mirga Phipps White have never had knowledge of or access to since July 2, 2019. Meanwhile, some of the
24 unauthorized Merrill Lynch VISA debit card holders continue to use the Plaintiff’s home until approximately his proof
25 of life with Bank of America on October 20, 2021, whereby days before a Los Angeles accountant, 39-year old mother
26 of one, Heidi Planck from Camden Capital, went missing near Hope and Flower Street, Los Angeles, California.

27
28 24. On June 9, 2022 Realogy Holding Company abruptly renames itself with the SEC to Anywhere Real Estate Inc.

FIRST CAUSE OF ACTION – FRAUD AGAINST DEFENDANT

1
2 25. Plaintiff realleges and incorporates herein by this reference each and every allegation set forth in paragraphs 1
3 through 24 of this complaint as though set forth fully herein.
4

5 26. The Defendants are liable for civil fraud in California. The Defendant had a fiduciary relationship as the escrow
6 company for the transaction of 594 South Mapleton Drive, Los Angeles, CA 90024. The Defendant actually knew or
7 should have known they were transferring funds fraudulently that belonged to the Plaintiff, Nicholas Phipps White. The
8 Defendant had a duty as one of the largest escrow companies in California to conform to a certain standard of conduct
9 and care to their client, but instead acted recklessly, which caused the Plaintiff to continue to be a Victim of fraud with
10 West Coast Escrow Company’s permission. West Coast Escrow knowingly allowed the purchase of the 594 South
11 Mapleton Manor House to go through on July 2, 2019 with the guise as a birthday gift for a fictitious “Erika White” a
12 disgraced, reality tv performer and wife of disbarred attorney Tom Girardi, neither ever a retained attorney, nor an
13 attorney-in-fact, nor father of the Plaintiff, who now serves as an Administrator of his account and proceeded to put 594
14 South Mapleton Manor on sale on or about February 12, 2022 with the now deceased Jeff Hilton of Hilton & Hyland.

15 27. The Defendant massively breached that duty with Mr. Phipps White the Defendant had a duty to act with the
16 utmost good faith for the benefit of the Plaintiff with respect to those matters. The Defendants as the Escrow Company
17 also had a duty to ensure not misappropriate Mr. Nicholas Phipps White’s funds and thus participate in wire fraud on July
18 2, 2019. The Defendants further breached their duty and acted negligently by allowing Mr. Nicolas Phipps White
19 fraudulent purchase of the home to go through and not report this matter to their internal fraud department or law
20 enforcement immediately to Beverly Hills, CA resident. West Coast Escrow provided substantial assistance and assisted,
21 helped conceal, or failed to act when required to do so, thereby enabling the fraud to occur.”
22

23 28. The Plaintiff was harmed by the fraudulent massive transfer of \$119,750,000 for 594 South Mapleton Drive,
24 Los Angeles, CA 90045. In doing these acts, the Defendants acted with recklessness, negligence, fraud and malice.

25 29. The Defendants had control of the purchase 594 South Mapleton Drive, Los Angeles, CA 90045 and the
26 Plaintiff;s funds coming into West Coast Escrow from the Merrill Lynch account and that normal prudence could for see,
27 anticipate fraud on the account, but did nothing to stop it. The Defendants failed to exercise reasonable or prudent care
28

1 as an escrow company would make such as checking the authenticity of sales documents and a manufactured “Erika
2 White” posing as the wife of the Plaintiff and Tom Girardi’s social security number being used as Nicholas Phipps
3 White’s.

4 30. The Defendants accepted sales documents for 594 South Mapleton Drive, and knew stolen funds were redirected
5 to family members, friends, partners, and politicians. The embezzled money was subsequently used to fund outrageously
6 lavish lifestyles for family, friends and politicians of Erika Girardi. This in return resulted in more than 25 debit cards
7 being used from an “Erika White/Salazar’.

8
9 31. As a direct and proximate result of the Defendants fraud and lack of duty by the West Coast Escrow Company
10 to conform to a certain standard of conduct that resulted in injury and loss to the Plaintiff. The Plaintiff has been
11 damaged and ask the Court for the correction of his title APN: 4359-013-032 (594 South Mapleton Drive, Los Angeles,
12 CA 90024) from “594 Mapleton LLC” to “Nicholas Phipps White” and punitive damages in amount of \$1,077,750,000
13 by Anywhere Real Estate Inc.’s West Coast Escrow Company and Coldwell Banker Realty .

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PRAYER FOR RELIEF

WHEREFORE, the Plaintiff Nicholas Phipps White, as an individual, being the real party of interest, prays for the following relief:

(b) A judgment ordering Anywhere Real Estate Inc’s West Coast Escrow Company to correct the grant deed from July 2, 2019 for \$119,750,000 for APN: 4359-013-032 (594 South Mapleton Drive, Los Angeles, CA 90024 from the street address “594 South Mapleton LLC” to “Nicholas Phipps White” an individual, married, recorded in the County of Los Angeles, CA within five (5) business days;

(a) A judgment of punitive damages, in an amount of \$1,077,750,000 from Anywhere Real Estate Inc. payable with in five (5) business days;

(c) An award of interest; and

(d) Such other and further relief that the Court deems reasonable and just.

DEMAND FOR JURY TRIAL

Respectfully submitted,

By: /s/ Nicholas Phipps White

NICHOLAS PHIPPS WHITE

324 South Beverly Drive, Suite 489

Beverly Hills, CA 90212

(415) 539-6760

ceo@thehollywoodlanddevelopmentcompany.com

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RECORDING REQUEST
FIDELITY NATIONAL TITLE
RECORDING REQUESTED BY:



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concurrently

Petra



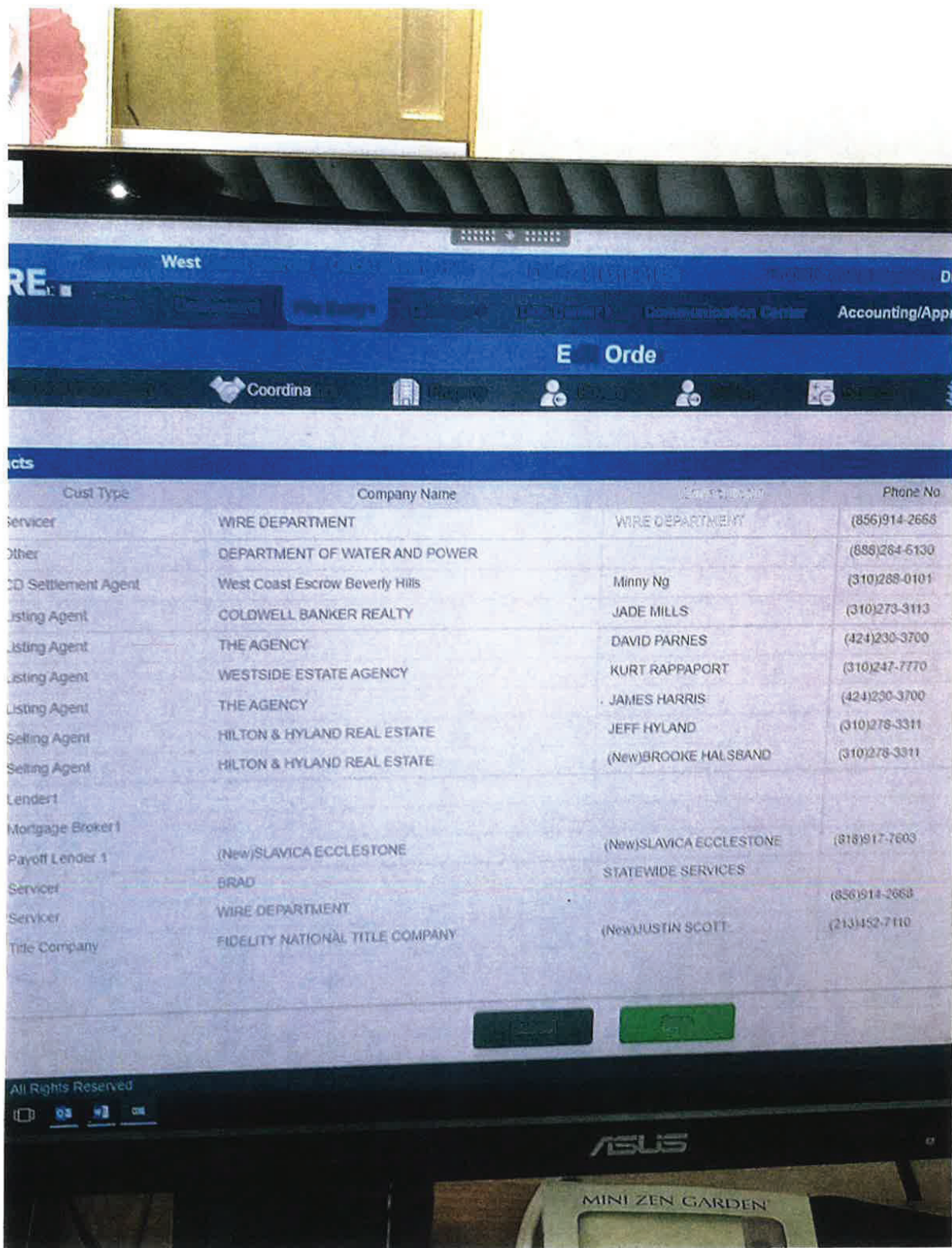
STATE OF CALIFORNIA
COUNTY OF Los Angeles)S

On June 21, 2019 before me MICHAEL GEKHT,
Petra Eccleston

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s), acted, executed the instrument.

hand and official seal.
Michael Gekht





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By TRACY WRIGHT FOR DAILYMAIL.COM
PUBLISHED: 12:57 PDT 2 September 2021 | UPDATED: 13:54 EDT 2 September 2021



Out and about: Erika Jayne looked downcast while heading to the gym in an all-black ensemble in Los Angeles on Wednesday afternoon

The *Pretty Mess* author tied up her platinum blonde hair into a bun and wore a pair of oversized shades while carrying a bright yellow wallet.

Learning: She paid for a parking meter with a credit card after admitting on a that she 'only learned how to go to the bank in March'

EXHIBIT A: UNAUTHORIZED USE BANK OF AMERICA MERRILL LYNCH FOR THE BENEFIT OF NICHOLAS PHIPPS WHITE VISA DEFERRED BUSINESS DEBIT CARD, SEPTEMBER 1, 2021, NEAR 1020 N PALM AVE, LOS ANGELES, CA

To: Stanley Page 5 of 9

2018-08-21 17:53:54 (GMT)

12132892465 From: Erika White

FL-100

PARTY WITHOUT ATTORNEY OR ATTORNEY NAME: Erika White FIRM NAME: STREET ADDRESS: 3389 Bennett Dr. CITY: Los Angeles TELEPHONE NO.: (619)358-0496 E-MAIL ADDRESS: white.erikanichoje@gmail.com ATTORNEY FOR (name):		STATE BAR NUMBER: STATE: CA ZIP CODE: 90068 FAX NO.: (213) 289-2465	FOR COURT USE ONLY FILED Superior Court of California County of Los Angeles AUG 21 2018 Sherri R. Carter, Executive Officer/Clerk of Court By <u>[Signature]</u> Deputy Christopher Herrera
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Stanley Mosk		CASE NUMBER: 18STFL10165	
PETITIONER: Erika White RESPONDENT: Nicholas White		<input type="checkbox"/> AMENDED	
PETITION FOR <input checked="" type="checkbox"/> Dissolution (Divorce) of:		<input checked="" type="checkbox"/> Marriage	
<input type="checkbox"/> Legal Separation of:		<input type="checkbox"/> Marriage	
<input type="checkbox"/> Nullity of:		<input type="checkbox"/> Marriage	
		<input type="checkbox"/> Domestic Partnership	
		<input type="checkbox"/> Domestic Partnership	
		<input type="checkbox"/> Domestic Partnership	

Case is assigned to Judge 59 Department

1. LEGAL RELATIONSHIP (check all that apply):

- a. We are married.
- b. We are domestic partners and our domestic partnership was established in California.
- c. We are domestic partners and our domestic partnership was NOT established in California.

2. RESIDENCE REQUIREMENTS (check all that apply):

- a. Petitioner Respondent has been a resident of this state for at least six months and of this county for at least three months immediately preceding the filing of this Petition. (For a divorce, at least one person in the legal relationship described in items 1a and 1c must comply with this requirement.)
- b. Our domestic partnership was established in California. Neither of us has to be a resident or have a domicile in California to dissolve our partnership here.
- c. We are the same sex, were married in California, but currently live in a jurisdiction that does not recognize, and will not dissolve, our marriage. This Petition is filed in the county where we married.
 Petitioner lives in (specify): Respondent lives in (specify):

3. STATISTICAL FACTS

- a. (1) Date of marriage (specify): 12/30/2013 (2) Date of separation (specify): 1/15/2018
 (3) Time from date of marriage to date of separation (specify): 4 Years 1 Months
- b. (1) Registration date of domestic partnership with the California Secretary of State or other state equivalent (specify below):
 (2) Date of separation (specify):
 (3) Time from date of registration of domestic partnership to date of separation (specify): Years Months

4. MINOR CHILDREN

- a. There are no minor children.
- b. The minor children are:

Child's name	Birthdate	Age	Sex
(1) <input type="checkbox"/> continued on Attachment 4b.			
(2) <input type="checkbox"/> a child who is not yet born.			

- c. If any children listed above were born before the marriage or domestic partnership, the court has the authority to determine those children to be children of the marriage or domestic partnership.
- d. If there are minor children of Petitioner and Respondent, a completed Declaration Under Uniform Child Custody Jurisdiction and Enforcement Act (UCCJEA) (form FL-105) must be attached.
- e. Petitioner and Respondent signed a voluntary declaration of paternity. A copy is is not attached.

Page 1 of 3

Form Adopted for Mandatory Use
Judicial Council of California
FL-100 (Rev. July 1, 2018)

PETITION—MARRIAGE/DOMESTIC PARTNERSHIP
(Family Law)

Family Code, §§ 297, 299, 2320, 2330, 3406;
www.courts.ca.gov

BY FAX

08/24/2018

To: Stanley Mosk Page 6 of 9

2018-08-21 17:53:54 (GMT)

12132892465 From: Erika White

FL-100

PETITIONER: Erika White	CASE NUMBER:
RESPONDENT: Nicholas White	

Petitioner requests that the court make the following orders:

5. LEGAL GROUNDS (Family Code sections 2200-2210, 2310-2312)

- a. Divorce or Legal separation of the marriage or domestic partnership based on (check one):
 - (1) irreconcilable differences. (2) permanent legal incapacity to make decisions.
- b. Nullity of void marriage or domestic partnership based on
 - (1) incest. (2) bigamy.
- c. Nullity of voidable marriage or domestic partnership based on
 - (1) petitioner's age at time of registration of domestic partnership or marriage. (4) fraud.
 - (2) prior existing marriage or domestic partnership. (5) force.
 - (3) unsound mind. (6) physical incapacity.

6. CHILD CUSTODY AND VISITATION (PARENTING TIME)

	Petitioner	Respondent	Joint	Other
a. Legal custody of children to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Physical custody of children to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Child visitation (parenting time) be granted to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

As requested in form FL-311 form FL-312 form FL-341(C)
 form FL-341(D) form FL-341(E) Attachment 6c(1)

7. CHILD SUPPORT

- a. If there are minor children born to or adopted by Petitioner and Respondent before or during this marriage or domestic partnership, the court will make orders for the support of the children upon request and submission of financial forms by the requesting party.
- b. An earnings assignment may be issued without further notice.
- c. Any party required to pay support must pay interest on overdue amounts at the "legal" rate, which is currently 10 percent.
- d. Other (specify):

8. SPOUSAL OR DOMESTIC PARTNER SUPPORT

- a. Spousal or domestic partner support payable to Petitioner Respondent
- b. Terminate (and) the court's ability to award support to Petitioner Respondent
- c. Reserve for future determination the issue of support payable to Petitioner Respondent
- d. Other (specify):

9. SEPARATE PROPERTY

- a. There are no such assets or debts that I know of to be confirmed by the court.
- b. Confirm as separate property the assets and debts in Property Declaration (form FL-160). Attachment 9b.
 the following list. Item Confirm to

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To: Stanley Mosk Page 7 of 9

2018-08-21 17:53:54 (GMT)

12132892465 From: Erika White

FL-100

PETITIONER: Erika White RESPONDENT: Nicholas White	CASE NUMBER:
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10. COMMUNITY AND QUASI-COMMUNITY PROPERTY

- a. There are no such assets or debts that I know of to be divided by the court.
- b. Determine rights to community and quasi-community assets and debts. All such assets and debts are listed
 - in Property Declaration (form FL-160)
 - in Attachment 10b.
 - as follows (specify):

11. OTHER REQUESTS

- a. Attorney's fees and costs payable by Petitioner Respondent
- b. Petitioner's former name be restored to (specify):
- c. Other (specify):

Continued on Attachment 11c.

12. I HAVE READ THE RESTRAINING ORDERS ON THE BACK OF THE SUMMONS, AND I UNDERSTAND THAT THEY APPLY TO ME WHEN THIS PETITION IS FILED.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 3/9/2018
 Erika White
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PETITIONER)

Date:
 (TYPE OR PRINT NAME)


 (SIGNATURE OF ATTORNEY FOR PETITIONER)

FOR MORE INFORMATION: Read *Legal Steps for a Divorce or Legal Separation* (form FL-107-INFO) and visit "Families Change" at www.familieschange.ca.gov — an online guide for parents and children going through divorce or separation.

NOTICE: You may redact (black out) social security numbers from any written material filed with the court in this case other than a form used to collect child, spousal or partner support.

NOTICE—CANCELLATION OF RIGHTS: Dissolution or legal separation may automatically cancel the rights of a domestic partner or spouse under the other domestic partner's or spouse's will, trust, retirement plan, power of attorney, pay-on-death bank account, survivorship rights to any property owned in joint tenancy, and any other similar thing. It does not automatically cancel the right of a domestic partner or spouse as beneficiary of the other partner's or spouse's life insurance policy. You should review these matters, as well as any credit cards, other credit accounts, insurance policies, retirement plans, and credit reports, to determine whether they should be changed or whether you should take any other actions. Some changes may require the agreement of your partner or spouse or a court order.

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4/30/22 Picture of package at 594 South Mapleton Drive, Los Angeles, CA 90024 left sitting outside, addressed to a Francisco Santizo (from ABM Industries) of New York, headquartered in former Merrill Lynch headquarters, One Liberty Plaza, NY.