# CONTINUATION SHEET – RUFUS VON THULEN RHOADES AND SUSAN P. RHOADES

1. From 1980 through today, Rufus Von Thulen Rhoades, ("Rhoades") was the Mansdorf Family Trust attorney. Mr. Rhoades was Lee Mansdorf's bankruptcy and civil case attorney during the original scam of W. Patrick Moriarty while Moriarty was masquerading as Leon Brukman and using the non-existent "Del Rio Development, Inc." company to steal the La Tuna and Ventura County property.

2. Rhoades represented Lee:

a. in "*In Re Del Rio Development, Inc.*," U.S. District Bankruptcy Court Case No. LA 82-05672 –LF, (**See Exhibit 1);**
b. in "*In re W. Patrick Moriarty*," Case No. 22863 CA, (**See Exhibit 2);**
c. in "*Mansdorf v. Brukman*," Los Angeles County Superior Court Case No. C380121, (**See Exhibit 3);** and
d. in "*Thompkins v. Mansdorf*," Los Angeles County Superior Court Case No. C529905, Second Appellate District, Division 3, Case No. B040918, (**See Exhibit 4**).

3. Through his representation of Lee Mansdorf in the Bankruptcy cases and the civil case against Leon Brukman, Mr. Rhoades had an intimate understanding of the fraud involved with Moriarty, his masquerading as Brukman, with Del Rio Development, Inc., La Tuna Properties, LTD, (still active and owned by Moriarty), California Canadian Bank, the AFF Companies, the Protective Equity Trust companies, General Securities Corporation, Keith Card, Janice McClanahan, Linda Thomas, Guillermo (Bill) Morgan, and a host of other individuals and entities.

4. With this knowledge, Mr. Rhoades engaged in his own criminal activity to steal from the Mansdorfs. To this end, Mr. Rhoades was an integral part of:

a. the 1996 theft of the La Tuna Canyon property which included a fraudulent exchange benefiting Rhoades and his wife to the tune of $850,000, (**See Exhibit 5, *Selected Portions of the 1996 Escrow File*);**
b. the fraudulent conversion of hundreds of thousands of dollars from Pacific Coast Lessor, an entity with a *Fifty-Year lease agreement* regarding property in Malibu, (**See Exhibit 6, Secretary of State Information on Pacific Coast Lessor, Inc., and Exhibits 10-17c, *Pacific Coast Lessor Information***);
c. the theft of additional Mansdorf Family Trust property in 2003 by Whitebird, Inc., and Glen McMillian, covered up by the sham transfer from Janice McClanahan to Harry Mansdorf as Trustee of a non-existent trust – a transfer wholly induced by Mr. Rhoades and Mr. Percell, (**See Exhibits 7, *Selected Portions of the 2003 Escrow File*; Exhibit 8a-8e, *Five Deeds Recorded in a Row*);**

d. Orchestrating the Janice McClanahan lawsuit, (**See Exhibit 9, *letter from Janice*).**

5. Pacific Coast Lessor was and rightfully is owned by the Mansdorf Family Revocable Trust, begun in 1997, a shareholder's statement from 1998 shows Lee Mansdorf owning 66.666667 percent of the Shares, and Pacific Coast Lessor was amended to issue 25,000 shares in 2001. **Exhibit 10, *Articles of Incorporation*, 11, *Shareholder's Statement* and Exhibit 12, *Certificate of Amendment.***

6. Mr. Rhoades is believed to have orchestrated the 50 year grant term easement to Pacific Coast Lessor from the Mansdorf Family Trust. E**xhibit 13, *50 year Grant Term Easement.***

7. Lease Agreements were then entered with Cell Phone Service Providers. **Exhibit 14**, ***Lease Agreements.***

8. Lee Mansdorf died under suspicious circumstances in 2003, with the medical records noting possible "poisoning". **Exhibit 15, *Selected Portions of Lee Mansdorf's Medical Records*.**

9. Video record of Harry Mansdorf confirms his belief his brother Lee was poisoned by Rufus Rhoades. **Exhibits 16a and 16b, *Video Testimonial of Harry Mansdorf*.**

10. After Lee Mansdorf's death, there was no activity for several years regarding Pacific Coast Lessor, Inc., and the files at the Secretary of State.

11. Then, June 23, 2003, a Statement of Information was filed by Mr. Rhoades, adding "Susan Peterson," who is believed to be Susan P. Rhoades, onto the Pacific Coast Lessor, Inc., as the Chief Executive Officer, and adding himself on as the "Chief Financial Officer." **Exhibit 17a, *2003 Statement of Information.***

12. April 2, 2009, a second Statement of Information was filed by Mr. Rhoades, changing "Susan Peterson" to "Susan L. Peterson," who is also believed to be the same Susan P. Rhoades, onto the Pacific Coast Lessor, Inc., as the Chief Executive Officer, also naming himself the "Chief Financial Officer." **Exhibit 17b, *2009, Statement of Information*.** In 2011, a no change statement was filed, reaffirming the ownership of PCL. **Exhibit 17c, *2011 Statement of Information.***

13. Mr. Rhoades, as the Mansdorf Family Trust attorney, violated his fiduciary duty to Lee, Mildred, Norman, Harry Mansdorf, and now Jaime DeJesus Gonzalez, in failing and/or refusing to disclose any information which would or could lead any of the Mansdorfs or Mr.

Gonzalez in his capacity as Trustee of the Mansdorf Family Revocable Trust to suspect any wrongdoing by W. Patrick Moriarty, (as himself and as Leon Brukman), by Del Rio Development, Inc., by Richard Percell, Whitebird, Inc., Linda Thomas, Guillermo (Bill) Morgan, Keith Card, or by Ms. Janice McClanahan and her Attorneys Cacciatorie, Sottile and Marcus.

14. Mr. Rhoades further committed extrinsic fraud by taking advantage of the Mansdorfs and the Mansdorf Family Trust by keeping the identity of Moriarty hidden from Lee Mansdorf and failed to expose himself or disclose the wrongdoing of all herein-stated, culpable individuals and entities.

15. Mr. & Mrs. Rhoades received and continues to unlawfully receive monies from:

a. Payments through Pacific Coast Lessor from New Cingular Wireless for money from a cell tower which is on the TRUST's Ventura County Pointe Malibu property;

b. Payments through Pacific Coast Lessor for location fees from media companies for film rights upon the TRUST's Ventura County Pointe Malibu property.

16. In 2004, while being deposed under oath in the Marylin Mansdorf civil case, when asked about the beneficiaries and trustee of the Walkemplue trust, Rhoades testified that he was a lawyer, and on those grounds he could not divulge the beneficiaries and trustee of the Walkemplue trust. **(Exhibit 18, *Deposition Testimony of Rufus Von Thulen Rhoades*).**

17. The truth is, Rhoades did not want to explain the beneficiaries or trustee of the Walkemplue Trust because both Rufus and his wife, (Susan P. Rhoades) are beneficiaries of the Walkemplue Trust, and his wife was the Trustee. (**Exhibit 19a and 19b – *Redacted Accommodation Agreement and <u>Unredacted</u> Accommodation Agreement***).

18. Ultimately, Rhoades <u>settled</u> with Marylin Mansdorf. **Exhibit 20, *Mutual Release and Settlement Agreement.***

19. Susan P. Rhoades, an individual and as Trustee of the Walkemplue Trust was thus an integral part of the fraudulent exchange which benefited Mr. and Mrs. Rhoades to the tune of $850,000 at the direct expense of the Mansdorf Family Trust. **Exhibit 5, *Selected Portions of the 1996 Escrow File.***

20. Recently, Rufus Rhoades refused numerous official requests by current counsel for the Trustee of the Mansdorf Family Trust for all documents, and an action is now required to be instituted to recover property, documents and records. **Exhibit 21, *Declaration of Michele A. Abernathy.***

21. These actions of Mr. & Mrs. Rhoades are continuing in nature, causing severe damage in the form an acutely felt absence of vital trust assets from the Mansdorf family for *decades*.

22. There is a current and pending divorce case between Mr. & Mrs. Rhoades. It is believed this is the vehicle being used to conceal the stolen Trust assets. **Exhibit 22a, 22b and 22c, Documentation from the Rhoades Divorce.**

23. In doing the things alleged herein, I am requesting Mr. Rhoades and his theft of Pacific Coast Lessor, Inc., be investigated for the following:

- Abusing any apparent legal authority or "color of law" to deprive any person of any rights under a sovereign Constitution or any other laws (18 USC 242).
- Conspiring to violate or interfere with any rights under the Constitution or other laws, by injury (including property loss), oppression, threat or intimidation (18 USC 241).
- "Racketeering" (organized crime) as interference with commerce under color of official authority (18 USC 1951(a), 1951(b)(2), (Chapter 95)), or conspiring for racketeering (18 USC 1951(a)).
- "Racketeering", by patterns of bribery or extortion, or related to financial institutions (18 USC 1961(1)(a)).
- Retaliation against a victim or witness (18 USC 1513(e)(1)), or conspiring for retaliation (18 USC 1513(e)(2)).
- Tampering with victims or witnesses by intimidation or misleading conduct, to interfere with reporting crimes to law enforcement (18 USC 1512(b)).
- Bribe taking as official conflict of interest for anything of value including indirect or promised future benefits (18 USC 201(b)(2)).
- Fraud by exceeding authorized access to any computer to obtain anything of value (18 USC 1030(a)(4)), or trafficking in any password or access code for a computer that affects interstate or foreign commerce (18 USC 1030(a)(6)(b)), and with any computer used by or for a financial institution, "including a computer located outside the US that… affects interstate or foreign commerce of the US". (18 USC 1030(e)(2)).
- Fraudulent making of any false entry or transaction in any banking institution including a foreign bank that would injure any organization, company or individual (18 USC 1005).
- Fraud or devising any means to defraud, or seeking to obtain money or property by false pretenses or misrepresentation, by any "wire" (telephone or internet) transmission in interstate or foreign commerce (18 USC 1343).
- Fraud or attempted fraud to obtain any funds or assets under custody or control of a financial institution by false pretenses or misrepresentation (18 USC 1344).
- Conspiracy or attempt to commit any fraud, subject to same penalties and punishment as for the primary offense (18 USC 1349).
- Financial Elder Abuse (Cal. Wel. & Inst. Code § 15657, et seq);
- Elder Abuse, (Cal. Penal Code § 368(b)(1);
- False Impersonation, (Cal. Penal Code § 529
- Embezzlement (Cal. Penal Code § 503);
- Grand Larceny (Cal. Welfare and Institutions Code § 15657, et seq).

- Attempted Grand Theft Of Real Property Valued Over Nine Hundred And Fifty Dollars By False Pretenses (Cal. Penal Code §§ 484 and 487)

The Elder Abuse against Harry Mansdorf was the proximate cause of Harry Mansdorf suffering great bodily injury, and ultimately death.

The Elder Abuse against Lee Mansdorf was the proximate cause of the death of Lee Mansdorf.

The Elder Abuse against Linda Mansdorf, that the abuse was the proximate cause of Linda Mansdorf suffering great bodily injury.

In doing these things, Rufus Von Thulen Rhoades and Susan P. Rhoades, with intent to do so, took, attempted to take, damage and destroy property of a value exceeding three million, two-hundred thousand dollars ($3,200,000.00), within the meaning of Penal Code Section 12022.6(a)(4)

Under California Penal Code section 502.9, "Upon conviction of a felony violation under this chapter, the fact that the victim was an elder or dependent person, as defined in Section 288, shall be considered a circumstance in aggravation when imposing a term under subdivision (b) of Section 1170."

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Jaime DeJesus Gonzalez, Declarant.

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Linda Florence Mansdorf, Declarant