

JIMMIE DAVIS PARKER, ESQ.
LAW OFFICE OF JIMMIE DAVIS PARKER, APC
4241 ARDEN WAY
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JANUARY 24, 2018

Via Email Only

James Finigan, Esq.
Law Offices of James P. Finigan
6437 Caminito Blythefield Suite C
La Jolla, California 92037
jpf@finiganlaw.com

Re: Kalasho Real Property

Mr. Finigan,

Please be advised that on October 17, 2017, Mr. Kalasho filed Document #2017-0481996 with the San Diego County Office of the Recorder memorializing a \$500,000 encumbrance on his Santee home.

Please be advised that such a conveyance, if it is authentic, is a violation of the Uniform Fraudulent Transfer Act and steps should be immediately taken to mitigate the harm caused by the fraudulent transfer including but not limited to, notifying the secured lenders of the pending litigation, as well as, securing the \$500,000 proceeds in trust.

If the filing does not accurately memorialize a conveyance, please immediately advise.

Regards,



Law Office of Jimmie Davis Parker, APC
Jimmie Davis Parker, Esq.

1 JIMMIE DAVIS PARKER, ESQ. (SBN: 252023)
LAW OFFICE OF JIMMIE DAVIS PARKER, APC
2 4241 ARDEN WAY
SAN DIEGO, CALIFORNIA 92103
3 619-887-3300
JDParker@gmail.com
4

5 Attorney for Plaintiffs Zhala Tawfiq, Lina Charry,
Paris Kargar, 3 Brothers Taco Shop, Inc. dba Tres Taqueria
6

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF SAN DIEGO

9
10 ZHALA TAWFIQ, et al.

11 Plaintiffs,

12 v.

13 MISS MIDDLE EAST BEAUTY PAGEANT
USA, INC., a California non-profit corporation; et
14 al.,

15 Defendants.
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) Case No.: 37-2017-00019692-CU-FR-CTL

) [IMAGED FILE]

) PLAINTIFFS REQUEST FOR ADMISSIONS
SET (ONE)

) [Assigned to Hon. Timothy Taylor for all purposes]

1
2 PROPOUNDING PARTY: ZHALA TAWFIQ, PARIS KARGAR, 3 BROTHERS TACO SHOP,
3 INC. dba TRES TAQUERIA,
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5 RESPONDING PARTY: MISS MIDDLE EAST BEAUTY PAGEANT USA, INC., a
6 California non-profit corporation; BESSMON KALASHO, an individual; JESSICA KALASHO, an
7 individual; BESSMON KALASHO AND JESSICA KALASHO, a married couple, dba "Miss
8 Middle East USA Beauty Pageant"; MIDDLE EASTERN CHAMBER OF COMMERCE fka SAN
9 DIEGO EAST COUNTY CHALDEAN AMERICAN CHAMBER OF COMMERCE, a suspended
10 California non-profit corporation;
11

12 SET NO: ONE

13 Plaintiffs, ZHALA TAWFIQ, PARIS KARGAR, 3 BROTHERS TACO SHOP, INC. dba
14 TRES TAQUERIA request that you answer the following Requests for Admission in
15 writing and under oath within 30 days after service of these Requests.

16 A. As used herein, the words "YOU" or "YOUR" refers to all Defendants
17 named herein, including but not limited to their employees, agents, servants, and
18 attorneys; specifically Bessmon Kalasho and Jessica Deddeh (Kalasho). If the request
19 cannot be answered the same way by each defendant, please submit separate answers.

20 **Requests for Admission**

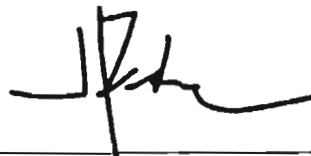
- 21 1. Admit that YOU caused the recording in San Diego County of the Deed of
22 Trust and Assignment of Rents (Doc ID # 2017-0481996) attached hereto as
23 Exhibit A.
- 24 2. Admit that YOU caused the recording in San Diego County of the Grant Deed
25 (Doc ID # 2017-0481997) attached hereto as Exhibit B.
- 26 3. Admit that the Trustee of 9422 Pryor Drive Trust, "Maximilian Von Ayers" is a
27 fictitious person.
- 28 4. Admit that the factual attestation regarding payment of \$500,000 from Isreal

1 Moses Sieff, LLC (Nevis) and/or Stewart Title of California, Inc. to Bessmon
2 Kalasho recorded in the Deed of Trust and Assignment of Rents in San Diego
3 County (Doc ID # 2017-0481996) is a falsehood.

- 4 5. Admit that the Deed of Trust and Assignment of Rents (Doc ID #
5 2017-0481996) attached hereto as Exhibit A is a false document as
6 contemplated under Penal Code section 115.
- 7 6. Admit that Grant Deed (Doc ID # 2017-0481997) attached hereto as Exhibit B is
8 a false document as contemplated under Penal Code section 115.
- 9 7. Admit that YOU caused the recording in San Diego County of the Deed of
10 Trust and Assignment of Rents (Doc ID # 2017-0481996) attached hereto as
11 Exhibit A for the purpose of obscuring assets from creditors.
- 12 8. Admit that YOU caused the recording of Grant Deed (Doc ID # 2017-0481997)
13 attached hereto as Exhibit B for the purpose of obscuring assets from creditors.
- 14 9. Admit that YOU caused the recording of the Deed of Trust and Assignment of
15 Rents in San Diego County (Doc ID # 2017-0481996) attached hereto as Exhibit
16 A for the purpose of obscuring assets from Plaintiffs.
- 17 10. Admit that YOU caused the recording of Grant Deed (Doc ID # 2017-0481997)
18 attached hereto as Exhibit B for the purpose of obscuring assets from Plaintiffs.

19 DATED: January 24, 2018

LAW OFFICE OF JIMMIE DAVIS PARKER, APC

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23 JIMMIE DAVIS PARKER, ESQ.
24 4241 Arden Way
25 San Diego, CA 92103
26 Telephone: 619/887-3300
27 Email: jdparker@gmail.com
28 Attorney for Plaintiff

EXHIBIT "A"
LEGAL DESCRIPTION

File No.: 01180-135616

Lot 15 in Fletcher Hills Panorama Unit No. 1-a in the City of El Cajon, County of San Diego, State of California, according to Map thereof No. 4796 filed in the Office of the County recorder of San Diego County June 15, 1961.

EXHIBIT "A"

The Easterly 62.06 feet of the Westerly 278.22 feet of the following described land:

That portion of Tract "B" of Godbold's Subdivision, in the County of San Diego, State of California, according to map thereof No. 2303, filed in the Office of the County Recorder of San Diego County, February 21, 1946, described as follows:

Beginning at a point on the West line of said Tract "B", distant thereon South $00^{\circ}21'14''$ West, 25.00 feet from the Northwest corner thereof; thence parallel with the North line of said Tract, South $89^{\circ}44'53''$ East, 359.96 feet; thence South $00^{\circ}15'07''$ West, 929.88 feet to the true point of beginning; thence continuing South $00^{\circ}15'07''$ West, 166.42 feet to an intersection with a line which is parallel with and distant 1121.30 feet at right angles Southerly from the North line of said Tract "B"; thence along said parallel line South $89^{\circ}44'53''$ East, 402.32 feet; thence North $00^{\circ}15'07''$ East, 166.42 feet to an intersection with a line bearing South $89^{\circ}44'53''$ East from the true point of beginning; thence North $89^{\circ}44'53''$ West, 402.32 feet to the true point of beginning.

END OF SCHEDULE A

RECORDING REQUESTED BY
WHEN RECORDED MAIL TO
AND MAIL TAX STATEMENTS TO

OFFICIAL RECORDS
Ernest J. Dronenburg, Jr.,
SAN DIEGO COUNTY RECORDER
FEES: \$31.00
PCOR: YES

PAGES: 3

NAME 9422 Pryor Drive Trust
ADDRESS 1620 Cliffdale Road
CITY El Cajon
STATE & ZIP CA 92020

GRANT DEED

TITLE ORDER NO. ESCROW NO. APN NO. 384-420-22-00

THE UNDERSIGNED GRANTOR(s) DECLARE(s) into grantors trust
DOCUMENTARY TRANSFER TAX is \$ 0 CITY TAX \$ _____
 computed on full value of property conveyed, or computed on full value less value
of liens or encumbrances remaining at time of sale,
 Unincorporated area: City of _____, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,
Bessmon Kalasho of 1620 Cliffdale Road, El Cajon, CA 92020,


hereby GRANT(s) to

9422 Pryor Drive Trust, MAXIMILIAN VON AYERS
(trustee name), Trustee, of _____
1620 Cliffdale Rd EL CAJON CA 92020 (trustee address),
(trustee city), _____
(trustee state and zip)

the following described real property in the County of San Diego State of California:

See attached legal description if required
Commonly known as 9422 Pryor Drive, Santee, CA 92071

Dated 6/17/17


Bessmon Kalasho

STATE OF CALIFORNIA)
COUNTY OF SAN DIEGO) ss.

On 10/17/2017
before me, B.S. PACIVAR (here insert
name and title of the officer), personally appeared
BESSEMON KALASHO

Who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her 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 acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of CALIFORNIA that the foregoing paragraph is true and correct.
WITNESS my hand and official seal.

Signature SEE ATTACHED CA. ACKNOWLEDGEMENT

BP

DOC# 2017-0481996



Oct 17, 2017 03:59 PM

OFFICIAL RECORDS
Ernest J. Dronenburg, Jr.,
SAN DIEGO COUNTY RECORDER
FEES: \$36.00
PCOR: N/A

PAGES: 3

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO

NAME 1620 Cliffdale Road Trust
ADDRESS 1620 Cliffdale Road
CITY El Cajon

STATE & ZIP CA 92020

TITLE ORDER NO.

ESCROW NO.

APN No. 481-043-040-00

DEED OF TRUST AND ASSIGNMENT OF RENTS (INDIVIDUAL)

This Deed of Trust, made this 17 (day) day of October (month), 20 17, between
Bessmon Kalasho, herein called Trustor(s), whose address is 1620 Cliffdale Road, El Cajon, CA 92020

Stewart Title of California, Inc., herein called Trustee, and Israel Moses Sleff, LLC (Nevis), herein called Beneficiary,
Witnesseth: That Trustor **IRREVOCABLY GRANTS, TRANSFERS AND ASSIGNS TO TRUSTEE IN TRUST, WITH POWER OF SALE,**
that property in San Diego County, California, described as:

1620 Cliffdale Road, El Cajon, CA 92020

Parcel number 481-043-040-00

See attached legal description if required

TOGETHER WITH the rents, issues and profits thereof, SUBJECT, HOWEVER, to the right, power and authority given to and conferred upon Beneficiary by paragraph (10) of the provisions incorporated herein by reference to collect and apply such rents, issues and profits.
For the Purpose of Securing: 1. Performance of each agreement of Trustor incorporated by reference or contained herein. 2. Payment of the indebtedness evidenced by one promissory note of even date herewith, and any extension or renewal thereof, in the principal sum of \$500,000.00 executed by Trustor in favor of Beneficiary or order. 3. Payment of such further sums as the then record owner of said property may borrow from Beneficiary, when evidenced by another note (or notes) reciting it is so secured.

The undersigned Trustor(s) requests that a copy of any Notice of Default and of any Notice of Sale hereunder be mailed to him at his address hereinbefore set forth.

Trustor(s), Bessmon Kalasho

STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

On 10/17/2017 before me, B. S. PACILVER) ss.
personally appeared BESSMON KALASHO
personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/hor/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.

WITNESS my hand and official seal.

Signature SEE ATTACHED CA ACKNOWLEDGMENT

(This area for official notarial seal)

California All-Purpose Certificate of Acknowledgment

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Diego

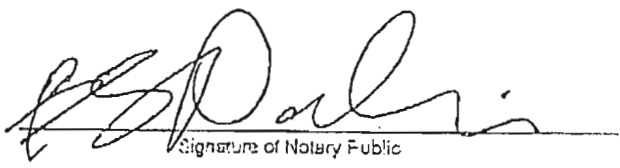
} s.s.

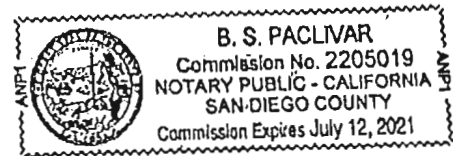
On 10 / 17 /2017 before me, B. S. PACLIVAR Notary Public,
personally appeared BESSMONI KALASHU

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/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.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.


Signature of Notary Public



Seal

OPTIONAL INFORMATION

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this acknowledgment to an unauthorized document and may prove useful to persons relying on the attached document.

Description of Attached Document

The preceding Certificate of Acknowledgment is attached to a document titled/for the purpose of GRANT DEED

containing 1 page, and dated 10 / 17 /2017