

EXHIBIT A

FRAUDULENT INDUCEMENT CLAIM 1

Counsel Curtin claims that the amount of \$1,958.33/months for property taxes listed on the September 2020 statement is for the First Quarter of 2018 and covers Property Tax fees for three months not one, thus only \$652.77/month. Words “three “and “one” are emphasized by underlining. Motion to Dismiss 5:13-14; 5:27-28 Footnote ⁵

According to Maricopa County Treasurer: Property Taxes in 2018 are: \$21,613.26/year or \$1,801.11/month

Thus, impossible to be \$652.77/month

The invoiced amount of Property Taxes on the September 2020 Statement to be paid by Plaintiffs is \$1,958.33.

Thus, three times the \$652.77 and is inflated by \$157.26/month or \$1,866.67/year

Robson and SRS defendants did not only lie about the real cost of Property Taxes in 2018, but additionally tried to extort from Plaintiffs \$157.26/month or \$1,886.67/year in unsubstantiated charges disguised as Property Tax.

FRAUD IN FACTUM CLAIM 2

The altered/forged Lease the inserted without Plaintiff’s knowledge clause requires of Plaintiffs to wait one year for TIA reimbursement, conditioned on Plaintiffs perfect performance.

July 02, 2020, and October 12, 2020, Scott Teerink refers to the clause as a basis to deny reimbursement of the TIA. It is a fact.


False Statements made by Counsel Curtin in Motion to Dismiss

1. Insufficiency of service of process relating to Scott Ellsworth. *Motion to Dismiss 2:26 Footnote* ³
2. Plaintiffs defaulting on SBA loan. *Motion to Dismiss 4:20.*
3. Fixtures and collateral were sold at auction. *Motion to Dismiss 4:21*
4. Plaintiffs filed two Complaints to AG. *Motion to Dismiss 4:22*
5. Invoiced Property Tax on September 2020 statement being a quarterly charge, while it is a monthly fee. *Motion to Dismiss 5:13-14; 5:27-28 Footnote* ⁵
6. Plaintiffs misunderstand the inserted clause. *Motion to Dismiss 7:1-6*

2018 Tax Details 303-50-989

Current Mailing Name & Address

RNS CENTER LP
 9532 E RIGGS RD
 SUN LAKES, AZ 85248

Property (Situs) Address 

9542 E RIGGS RD
 SUN LAKES, AZ 85248

Area Code	800001	Assessed Tax	\$21,613.26
Exemption Status		Half Tax	

Primary Tax
Secondary Tax
Flood Tax
Special District Tax

- Primary Tax
- Secondary Tax
- Flood Tax
- Special District Tax

Amounts Paid

Tax Paid	\$21,613.26
Interest Paid	\$0.00
Fees Paid	\$0.00

TOTAL PAID	\$21,613.26
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Special Tax Districts

District	Name	Percentage	Tax	Tax Paid
11572	SUN LAKES VFD	98.46%	\$4,995.52	\$4,995.52
14705	OCOTILLO WATER CONSERVATION	0.00%	\$0.00	\$0.00
30001	EAST VALLEY INSTITUTE OF TECH	1.54%	\$78.06	\$78.06