

Randy Quaid

SUP

Pro -Se

D. John Smith

SUPERIOR COURT OF THE STATE OF CALIFORNIA

BC 444264

COUNTY OF LOS ANGELES

Complaint

RANDY QUAID, an individual,)
Mr. and Mrs. Randy Quaid for:)
Bees N Honey, a California)
corporation, Ichor Inc, a California)
corporation, Trendline Inc, a)
California corporation, Quaid)
Family Trust aka E&R Quaid)
Family Trust)

PLAINTIFF SEEKS DAMAGES FOR
CONVERSION, INVASION OF PRIVACY,
CONTRACT INTERFERENCE,
INTERFERENCE WITH PROSPECTIVE
ADVANTAGE, FALSE PUBLICITY, THE
CREATING OF FALSE EVIDENCE,
EMOTIONAL PAIN AND SUFFERING,
MONETARY DAMAGES TO BE
DETERMINED AT JURY TRIAL

Plaintiffs,

vs.

City National Bank, Gavin Perdue,)
Mariam Zakian, Paul Krasnow of)
Northwestern Mutual,)
Lauren Braun, Bruce Berman,)
Sandy Bresler, John Kelly, Steven)
Arcieri, Warren Grant, Joel Mandel,)
Barry Hirsch, Allen Watenmaker,)
David Braun, Sean Shenassa,)
Mickey Segal, Kimberly Buffington)
(as Sotheby's realtor), and)
Does 1-50, inclusive)

Defendants.



CIT/CASE: BC444264 LEA/DEF#:
RECEIPT #: CCH478057045
DATE PAID: 08/23/10 01:13:38 PM
PAYMENT: \$905.00 0310
RECEIVED:
CHECK: 905.00
CASH:
CHANGE:
CARD:

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Explanation as to Pro-se Filing

This is being filed pro-se. After reviewing with our Beverly Hills tax attorney how to file pro-se, we have chosen to file pro-se because in 1983 an attorney named Lloyd Braun and an estate planner named Alan Watenmaker put together a fraudulent living trust.

We believe the trust documents being used to steal our assets at the bank contain language that make it possible for a new attorney(s) representing us to be disqualified. Since it is our money, property and assets at issue here we cannot be disqualified by the document language so we represent ourselves Pro-se here.



Motion For Emergency Relief From City National Bank's Illegal, Unauthorized Conversion of Our Assets

It is ordered that City National Bank's Westwood branch open accounts in the name of Randy Quaid on his behalf, for the sole use of Randy Quaid with his 1.5 million dollar equity line and to provide checks and debit cards to Randy Quaid within 24 hours.

Judge presiding



Probate Filing in Santa Barbara County Used To Cash Randy Quaid's Checks

A falsified probate file for a deceased person in Santa Barbara County named "Ronda L Quaid" and an altered drivers license for Randy Quaid with the name "Randal Quaid" were used by Bruce Berman, Lloyd Braun, and Alan Watenmaker and City National Bank to cash the checks cut to Randy Quaid and redirect funds to the falsified probate file.

Probate file and Quaid Trust accounts listed in index.



Randy Quaid's Declaration and Complaint

I had never imagined in my most bizarre fantasies, that becoming a successful actor would mean that I would put my self, my family and my career in the hands of business managers, entertainment attorneys, and agents who would use my salaries, profits and residuals to fraudulently finance real estate loans, not only for their own enrichment, but also for the benefit of a bank, City National Bank to be precise.

My "trusted advisors" and their associates needed me to keep working so they could steal my salary to pay off the plethora of fraudulent real estate loans they had taken out from City National Bank behind my back, loans approved by the bank because it was the designated "beneficiary" to the property, loans secured with my stolen life insurance policy and my forged signature. I have paid out at least \$10,000,000 in loans I did not need or want, loans I had no idea I was paying for, loans that, had I known of their existence, I could have rightly used for myself.

There are names of people attached to my corporations I have never even heard of. People like Joel Mandel who is listed as the trustee of one of my corporations. Mr. Mandel, it turns out, is my ex-attorney's (Lloyd Braun) business manager. It's no surprise that I no longer receive any checks for the work I've done under this corporation. For instance, I still haven't received anything recently for *Brokeback Mountain* in the way of residuals or streams of income from ancillary outlets such as Blu-Ray, dvds and pay television. I've been told that I should expect to see as much as \$600,000 under normal circumstances.

In early June of 2010 I went into the Roxbury branch of City National Bank in Beverly Hills to request information regarding 2 loans totaling approximately one million dollars that had been taken out in my name. Prior to May of 2010 I had had no idea of the loans' existence. All I know for certain is that I never took out either of these 2 City National Bank loans and I had no idea why my name would be attached to them as if I had. When I went in to the Roxbury branch to get to the bottom of the mystery I was given the run around, first by the teller, then by the teller's manager, then by a vice-president. I was told by all three that the bank would not be able to satisfy my request to see the loans' statements and signature cards. Even the loans' closing statements were off limits to me. I reminded each of them that the loans were in my name and that it was my legal right to see the information I was requesting. They completely ignored my protests and informed me that the only way City National Bank would be able to communicate with me was through my attorney talking to their legal representative. I then demanded to see the information about the loans and told them that I was not moving away from the window until I did. It was about this time that I was approached by a security officer who asked me to leave the premises. The sudden appearance of the security officer surprised me because I had not been causing a disturbance. During the conversations with the teller, the manager and the vice-president I never once raised my voice to a level that would arouse the attention of the other customers. I

was merely determined to stay at the window until the bank gave me what was my legal right to have, the statements and information regarding the 2 loans in my name. I reiterated to the security officer that I had no intention of leaving until I got what I had come for. The security guard walked away leaving me standing alone at the counter. In the meantime the manager and vice-president had both retired to their posts and the teller was staying well away from me. After standing alone like this for several minutes I was again approached by security, this time by another officer with, I gathered, a higher rank than the first. The second officer also told me that I would have to leave or there would be "a problem." I told her I already had "a problem" and that I wasn't going anywhere until I was given the statements to the 2 loans in my name. The second security guard again asked me if I was going to cooperate or not. I told her I was staying right where I was. She said something like, "All right. Have it your way," and went off to, I presumed, either summon her superior or call the police.

After a few more minutes of enduring a very cold shoulder from everyone behind the counter area, I realized that I wasn't going to get anywhere and left. I walked across the customer area to the second security officer's desk to find her on the phone giving the police my description. That's when I was approached by the bank's head of security who asked me if he could be of help. I told him that I didn't want any trouble; that I just wanted to see the information on the 2 loans that someone had opened in my name without my knowledge. The security head offered to grab the vice-president so the three of us could go sit down at a desk and talk the situation over. This I agreed to do and followed him over to the counter where he asked the vice-president to speak with me. The vice-president led me to a cubicle at the rear of the customer area where we sat for ten minutes as I again went through the litany of my reasons for being there and expressing my dismay and frustration at being refused access to loan information that was legally mine to have. I told him I had no idea what the loans had been used for or even what person or persons opened them. The vice-president merely responded with a diatribe of how it was impossible for him to give me the information I was after, that the entire matter was out of his hands and was considered by CNB to be a legal issue. If I wanted any more information from the bank regarding any issue I would have to request it through an attorney; that no one outside the bank's legal counsel was allowed to speak with me. I offered him a list of names and told him that if any of these names were doing business with the bank on my behalf in any manner that I was revoking their power of attorney. The vice-president refused to accept the list, telling me that I would have to have an attorney give the names to the bank's legal department. I finally admitted to myself that I was just banging my head against a stone wall of double talk. I got up and left the desk. On my way out a Beverly Hills police officer had arrived on the call from the second security officer. I explained to him what I was there for and that it wasn't my desire to make trouble or to cause a scene. He was very nice and listened attentively to my complaints about City National's criminal treatment of me not only regarding this event, but also our recent run ins with other CNB reps as my wife and I have sought information not only about the two loans,

but also about our CNB accounts and other activities we believe the bank is conducting in our name illegally.

I recently found out that the two loans in question, one for 450 thousand dollars and the other for 625 thousand dollars were paid off on February 10, 2010 and closed along with a line of credit, all without my knowledge. We believe the 450 thousand and the 625 thousand dollar loans could only have been used to pay off the mortgage on our home in Montecito several times over.

During the spring of 1991 I was offered a television series to be shot in Los Angeles. Lloyd Braun was very enthusiastic about the offer. He told me he could get a lot of money for me up front and convinced me that a 40 million dollar payday was in place if the series ran long enough to go into syndication. There were also provisions for a car and driver to take me to and from the studio and a zero interest free loan should I decide to buy a home in Los Angeles. After it was all said and done I had the third best deal ever negotiated for an actor at that time after Bill Cosby and Rosanne Barr. We decided to take the deal and put our house in Montecito on the market. In the latter part of that year our business manager, Warren Grant, called to tell us he had found a buyer for the house. The "buyer" was a Mr. Bruce Berman who at the time was an executive at Warner Brothers. We let Grant and our attorney, Lloyd Braun, handle all of the details of the "sale". Ever since then, for the past 19 years, my wife, Evi, and I have lived under the impression that we had sold the house in Montecito to Mr. Berman. However, new facts have revealed a decidedly different story.

On October 23, 1989, my wife, Evi, and I opened escrow to purchase a property in Montecito, CA. for \$1,350,000. To facilitate the purchase we put down \$350,000 and took out a \$1,000,000 mortgage loan from Chase Bank. We delegated to our business manager, Warren Grant, and our attorney, Lloyd Braun, the business of handling the details of the escrow. However, it has recently come to light that, unbeknownst to us, Mr. Braun had inserted himself into our escrow the very next day on October 24, 1989, essentially attaching himself and his wife, Lauren, to our assets through a "pooled loan" as described in the escrow documents. By inserting himself into our escrow Braun was then allowed to ride on our coattails, so to speak, and use our equity in the Montecito property without our knowledge to secure subsequent loans for our corporation of which he had misappropriated the income for himself in return for designating City National Bank as the "beneficiary" of the various properties he purchased with my equity.

We have also recently discovered that we apparently paid off the Chase loan in 1990, less than a year after moving in. Since City National Bank was the only bank where my wife and I and our corporation, Bees N Honey had accounts in 1990 we would have had to pay off the Chase loan through CNB, yet we have no record there that this ever occurred. This is very odd since Chase Bank clearly shows that the loan was paid off in 1990, however, neither Evi or I have any recollection of doing

so. This means that the paying off of this loan was transacted completely without our knowledge.

The head financial officer at the Chase Bank branch in Pasadena, Ca recently researched the entire Montecito transaction and has informed us that not only had her bank's loan to us been repaid, the Montecito property was never sold, that we, for all intents and purposes, still owned the house. She also informed us that she was unable to find our original loan number at her bank, which means that my wife and I have been paying off Braun's loan, which he has been using as seed money to finance other subsequent investments for his own enrichment for 20 years. All in all, Mr. Braun has entered into at least three other investments that have left my wife and me paying off his misappropriated corporate loans for \$1,700,000, \$975,000, and \$763,000. All of these subsequent real estate purchases stem directly from our original Montecito mortgage loan that Braun and his wife misappropriated from us as trustees with no permission to do so.

If the Montecito property was never sold then that means Mr. Berman did not actually buy our property as we had been led to believe by Warren Grant and Lloyd Braun at the time of the transaction in November of 1991. During a recent meeting with Warren Grant in March of 2010 he told us point blank that he didn't sell the house; but he was the very one we were communicating with in 1991 at the time the supposed "sale" was being transacted. At that time he gave us every indication that the house had been sold. Could it be that the loan was paid off without our knowledge and we had somehow given the Montecito house to Berman. I never signed any transference of deed or ownership or received any money from the "sale"; my wife and I just assumed that Grant had taken care of buttoning up the necessary details of the transaction and had put the money into our accounts. What I do know is that we moved out of the Montecito house and construction began to expand its square footage. A guest quarters was erected outside and a swimming pool was put in. I believe Berman was basically using the property not only to pull out the equity, but also as a clearing house for the profit checks sent to me by his studio, Warner Brothers, via a trust in my name and the property.

Shortly before all of this business about the paid Chase loan came about my wife met with Mr. Berman at his office in Beverly Hills and he revealed that in the 16 years he had the house he never actually lived in it. He also told Evi that he had removed the mailbox and had never put the utilities in his name. The fact that he removed the mailbox is curious since he was a Warner Brothers exec, and I should have been receiving large profit participation checks for films I'd done for the studio (I have never received from Warners all of the money owed to me). If there were no mailbox to receive them they would have been returned to the studio. However, I believe the checks went into a falsified probate file for a "deceased person" in Santa Barbara County named "Ronda L. Quaid." My name on my driver's license at the time read: "Randal Quaid" even though my first name should have been spelled two L's. and I would never have known about them. I would also have relied on my Lloyd Braun and Warren Grant for this information.

The two City National Bank loans (450 and 625 thousand dollars) in my name that I was trying to get information on were paid off without our knowledge in February of 2010. If these two loans had been used for the Montecito does that mean that after all these years we had been paying off a second loan on the property? We happened to discover the existence of the two loans when my wife and I dropped in at CNB's Westwood branch and a vice-president pulled them up on her computer. Just this past week we learned from a representative at City National's Doheny branch that the statements for these two CNB loans were going to Warren Grant. These loans, which until just a few months ago we had absolutely no knowledge of were paid off just this past February, yet an accountant we severed ties with in 1996 is receiving the loans' statements apparently on my behalf without ever making me aware of them. This means that City National Bank was deliberately sending out the loans' statements to Warren Grant and hiding them from us.

During Evi's and my visit to the Westwood branch the vice-president also showed us an address that City National was using for my wife's corporation, Evihome Inc. It was an address we had no familiarity with whatsoever. When we went to the address it turned out to be a postal service store where someone had rented a mailbox using the name of Evi's corporation. The postal store refused to let us see the signature card to the box without a subpoena. Whoever signed for the box one thing is clear, CNB was knowingly and deliberately sending our mail there.

City National Bank is also responsible for putting the contents of our safety deposit box on the State of California's Controller's website in November of 2009; this even though we were frequently in contact with our private banker Mariam Zakian, a vice-president in the entertainment division at the Roxbury branch. The contents of the safety deposit box included our corporate documents, which have been stolen. Ms. Zakian never once mentioned or revealed to us that the safety deposit box had been given over to the state nor did she ever make us aware of the existence of the 450 and 625 thousand dollar loans or all of the land in my trust accounts and my stolen life insurance policy account.

After my appearance at the Roxbury branch requesting information regarding the two loans in my name, Evi and I made a request through an attorney to CNB for documents. One of the documents we received from the bank was a life insurance policy for \$1,000,000 that we had also stored in the safety deposit box. This policy was intended for the benefit of my wife in case something should happen to me. How our policy got out of the box without our knowledge or permission is still a mystery, but even more disturbing was what City National has done with it. Someone associated with CNB, Gavin Perdue and a Ms. Wheeler, have not only taken this life insurance policy without our permission, they have assigned it over to the bank with my forged signature, presumably to use as security for the fraudulent loans taken out by Braun and others. Since the policy itself was for a one million dollar settlement, we believe it was being used as collateral to support the \$450,000 and the \$625,000 loans we knew nothing about. This theft of my life insurance

policy and the forging of my signature we believe was done with the full knowledge of Gavin Perdue, then the head of City National Bank's entertainment division at its Roxbury branch.

Also upsetting is when Evi called the head of the CNB Roxbury branch's estate planning floor to ascertain if they could manage the royalties generated from my film titles (she had been told they handle Steve McQueen's royalties for his estate); she was told by the head of estate planning that CNB preferred "dead actors." On one occasion when she was on her cell phone in Texas she overheard a man's voice coming through the receiver. The voice said, "If you kill her there's a lot of money in it for you." Evi wasn't sure if this was an actual threat on her life or meant to intimidate her as a witness, but this together with the stolen life insurance policy and the estate planner's insensitive remark, and now Alan Watenmaker, the estate planner acting very evasive when we request trust id numbers and the fact that Watenmaker's firm did Michael Jackson's will and life insurance policy trust, has us very suspicious of their motives.

Since discovering the atrocities committed against us by City National Bank we have visited several other CNB branches seeking assistance and information regarding all of the issues described herein. At every branch with the exception of Westwood we were greeted with total apathy or rudeness or both. It is painfully obvious that City National Bank cares not a whit that we have suffered having our life insurance policy stolen.

City National is not only willing and able to forge life insurance policies; I have discovered the bank is also forging trusts, wills and powers of attorney. City National Bank has fraudulently redirected my salaries from various industry projects including the *Elvis* miniseries. These funds, instead of being paid out to me were fraudulently redirected by CNB to its loan department for the repayment of phony loans over and over - evergreen loans, so to speak. The bank has also redirected my salaries to phony trust assignments, using improper powers of attorney and my forged signature. As a result, the salary checks sent to me are for \$0.00. **(documented)** CNB thus has been acting as a phony "collection agency" and conspiring with and using others such as my ex-attorneys and business managers as its "collection agents" to steal my salary, not only on the *Elvis* project, but other projects as well.

As recently as January 22, 2007 Lloyd Braun substitutes trustees over to Azar Falsafi, a CNB vice-president, on property Braun had acquired with our equity.

CNB has debited land tax **(from a CNB master account?)** (exhibit master account check) via software known as "Datafaction" without informing me or my wife, Evi.

On 12/27/95 Warren Grant and Lloyd Braun have Gavin Purdue, the head of the entertainment division at CNB's Roxbury branch, cut a check to Ichor Inc. for \$625,

000 to be held as collateral. Purdue then transfers the 625,000 to "Randall Quaid" even though all of Mr. Quaid's accounts at CNB are under the name Randy Quaid.

I have found my corporate ledger with a 4 million dollar balance that was never transferred to me. I have attached the ledger as exhibit 1.

Another instrument in the accountants' and attorneys' arsenal are non-profits such as trusts and foundations. Non-profits are, of course, a reliable tax haven and apparently a great shelter to run money through if abused in the right way. They use these non-profits to do a thing they call "crushing the assets." Crushing the assets involves gaining control of a corporation, preferably the corporation of a film actor who is always working his butt off 12 to 20 hours a day in some of the most God forsaken environments imaginable (there are nice locations too, such as Hawaii). They gain control of the celebrity's corporation's accounts by inserting one of their own into the position of trustee, either by forging the actor's signature or abusing a power of attorney that has most likely been signed over to the new trustee without the actor's knowledge. They then "crush" the corporation's assets into a not-for-profit foundation or a trust with legit sounding names such as the "Quaid Family Foundation" or the "Quaid Family Trust".

In February of 2008 my "trusted advisors" converted and merged my assets with my brother's through a "Quaid Family Trust" scheme; in fact, they changed the name of the trust twice while my brother and I were in Utah at the Sundance Film Festival promoting separate pictures, him at Sundance, me at Slamdance. The change went from "Quaid Family Foundation" to "Quaid Family Trust" then back again to "Quaid Family Foundation." (This document sits at the California Secretary of State's office and I will have it at the trial.)

Running my assets through the Quaid Family Trust also makes it easier for my "trusted advisors" to merge my assets with my brother's without my knowledge. In one particular case my profits have been used by my "trusted advisors" to entrap my brother on a dead end private street, in the darkness of a canyon designated as a flood zone, where he has purchased two homes next to each other: one he bought from my ex-attorney, Lloyd Braun, and the other from the Clarke Trust, an entity controlled by Warner Brothers. At the time of purchase the Clark Trust house was occupied by a Sotheby's real estate agent who I believe was pretending to live there for the purpose of exploiting my brother's desire to have easement of the bridge to his main residence. The realtor used harassment tactics to get my brother to "buy her out". I believe that my brother never even knew that this "neighbor" was a Sotheby's agent, that this information was withheld from my brother by both his business manager, Sean Shanassa, and by his wife, Kimberly Buffington, who is also a Sotheby's agent and comes from a family that owns a medium-priced home construction business in Texas. Both houses that Dennis purchased sit on a piece of land described on county maps as a "sewer easement." To get to the main house that is his residence, it is necessary to cross a bridge that was constructed with no liability by Lloyd Braun, a bridge that crosses over what any realtor would likely

describe as a "babbling creek" but is in reality nothing more than an open sewer drain without a pipe around it that quickly turns into a seven-foot deep raging torrent whenever it rains. All of this sitting on two+ secluded acres that receives very little sunlight during the day. For this my brother paid Mr. Braun and the Clark Trust 10 million dollars; he bought land stolen with my money - 3.6 million in equity to be exact - that had accrued in the Montecito property.

Before my brother came into the picture Braun had secured the 3.6 million dollar purchase price of the land with the equity he pulled out of property belonging to me. He did this unbeknownst to me of course. He then named City National Bank as the "beneficiary", as he does for all of his real estate investments. He erected the house that Dennis would eventually buy and to keep the costs down gave a 22% share of the future sale price to a contractor in exchange for building it. After the sale to my brother Braun still retained the other half of the original purchased property. A nice tidy, profitable deal, except that it was financed at my expense. Getting my brother to buy property paid for by Braun with money he had stolen from me was the fulfillment of my "trusted advisors" aspirations to merge my brother's and my assets together. As a small boy lying in bed next to my younger brother as I dreamed of one day becoming a Hollywood star it never occurred to me that my profits would one day be used behind my back to accrue so much land that it would actually entrap my brother inside of a private street acquired with the earnings from my 40 year career in film and television so that the bank (CNB) and my attorney can more easily hide and cash my checks via my brother and his foundation named for the last name we both share, The Quaid Family Trust and a fraudulent probate account under the name "Quaid Trust". It's doubly unfortunate that the land in question is a sewer easement.

City National Bank would rather give its loans to Lloyd Braun and his wife, Lauren than to me, because it knows the Brauns will name the bank as the "beneficiary" and I won't. For this reason, City National Bank knowingly and deliberately works against my financial interests, forging my signature on a document that assigns the claims of my life insurance policy to the bank so the policy can be held as collateral for a home loan placed in a life insurance trust without my knowledge. All of this is in concert with a business manager I used to have, Warren Grant, who quit me in 1996 and stole my bank accounts. I was the workhorse for these people, the engine that churned out the "principal" payments on loans. I was in effect their indentured servant. The fruits of my labor were not my own. Everything was inverted. I was working for my "trusted advisors" when they were hired to work for me.

All of these real estate investments, trusts and foundations are done with taxes in mind. The challenge for these con artists like Watenmaker, Braun, Joel Mandel, and Grant, of course, is to hide as much of the investments' returns as possible without getting stung with an unsavory tax bill. Under such schemes as the ones I have briefly described herein the IRS and I are either left out in the cold, deprived of information seriously needed.

Even though I work in what is considered by many to be a glamorous profession, and I have somehow managed in spite of everything to survive, I still consider myself to be a self-employed small businessman. I pay my taxes. I have no remorse about doing so. President Obama has tried to help the small businesses in this country because he and everyone know that they are the backbone of the nations economy. That is why he offered to the banks great sums of money to provide loans to the small business owners. But instead of loaning the money, the banks have held on to it, using it to buy up real estate, not only because land and property are cheap, but because the real estate is a good tax shelter. Also, the interest rates for a fixed rate are the lowest in history, but the banks are using the rates for their own investments even as they withhold loans to the small businesses. In the meantime these financial institutions, City National Bank included, nickel and dime the small customer with overdraft fees, check cashing fees, debit card fees, fees for just about every banking transaction. This is disgusting and only serves to deaden the pace of recovery of the nation's economy. I would like nothing more than to rip away my assets from these scammers and tax cheats, or as I refer to them, my "trusted advisors" and make them pay for the abuse they have heaped on me and my wife over these past twenty years, literally forcing us into servitude to finance their investments and enrich their lives while systematically destroying ours. Being an unwitting slave to others agendas is no way to live in the freest and greatest country on the face of the earth.

We put too much "trust" in CNB and the people we've hired to take care of our money and property. These were people we relied upon to watch our backs while we were out earning the money. Much of the time we were in places so remote it was difficult to even make a phone call. Having someone you trust keeping an eye on things is a primary necessity for a working artist. Over the past 40 years I have earned approximately 40 million dollars so I put a lot of trust in people like Grant, Braun and my bank to look out for my wife's and my interests. Our mistake was choosing the wrong attorney, the wrong estate planner and the wrong bank.

Because we were fraudulently removed from the Montecito property under the false impression that it was being sold, and because we still hold ownership claim to the property that's been drained of all of its equity, and for the reason that we have been denied and cheated out of the increasing value of our original investment for the past 18 years through subterfuge and misrepresentation of the true status of the various loans taken out on the property over the years, and because our original mortgage loan was used by Lloyd Braun and others as seed money to purchase subsequent properties with City National Bank attached as the "beneficiary", and because City National Bank knowingly allowed subsequent loans to be taken out in my name without my knowledge or permission, taken out by a person or persons either known or unknown to me, and because CNB knowingly sent the statements for the loans that were attached to my name to a business manager that it clearly knew hadn't represented me in 14 years, and because CNB knowingly used a fraudulent address for my wife's corporation, Evihome Inc. when the bank was fully knowledgeable of our true and proper address, and because CNB has knowingly

accepted phony powers of attorney to be used with forged documents, has allowed and is continuing to allow persons such as Lloyd Braun, Joel Mendel, Warren Grant, Bruce Berman and others to use my earnings as a means to collect on and fund fabricated loans and to set up phony trusts and, and since the bank has irresponsibly transferred our safety deposit box containing our corporate documents to the state even though at the time we were in constant contact with the bank's representatives, and since our credit rating and financial well being have been severely damaged as a result of CNB's fraudulent acts against us, and since our relationship with other banks have been severely compromised as a result of CNB's enabling of others to destroy us and our reputation not only in the banking community, in professional and personal areas of our lives as well, I am seeking a jury trial for damages and compensation for City National Bank's flagrant violations against us including but not limited to: defamation, conversion of assets, contract interference, theft of life insurance policy, invasion of privacy, interference with prospective advantage, and creating false publicity and false evidence.

Since my wife and I still own the Montecito property I am asking City National Bank for a full restitution of all monies with interest that have accrued from the property's increasing and inherent value and for the deed to the Montecito property to be given back to us solely in our names. In addition we are asking for all monies received from any subsequent investments made by any and all parties having any involvement with our Montecito property since 1989 who may have used the profits from the property's equity for those subsequent investments or else have taken out CNB loans in my name, whether opened with or without my knowledge, to facilitate those subsequent investments. This includes the returns of any subsequent investments made by Mr. Berman, his wife, or any of his associates including but not limited to my former representatives, Mr. Lloyd Braun and Mr. Warren Grant and Alan Watenmaker. Return of my original accounts, a full accounting of the touring musical company's account (Isis) that Warren Grant, and City National's Gavin Perdue and Azar Falsafi may have run my Montecito equity through.

I also seek damages and compensation for pain and suffering directly inflicted on me. I also seek damages from any person responsible in any way for aiding and abetting the fraudulence perpetrated against me by City National Bank, including but not limited to: CNB's Gavin Perdue, Mariam Zakian, Alan Watenmaker, Lloyd Braun and Warren Grant and any other persons named herein as the "Defendants."

By bringing this suit my goals are the following:

- 1) To stop the blatant and fraudulent conversions of my properties starting in 1989 by City National Bank (CNB)
- 2) To request jury damages.
- 3) Immediate tax audit of all trust accounts, all bank accounts, all loans, and all lines of credit to ascertain our true tax profile and tax ID numbers. This audit should be performed by our tax specialist in conjunction the criminal investigation unit of the IRS.

- 4) If the \$9,000,000+ owed to the IRS is true and accurate I will happily do everything in my power to rip it away from the Defendants listed herein and turn over every last dime.

I am requesting the following to be returned to me with interest plus damages for the 20 years of pain and suffering I have had to endure as a result of City National Bank's and the Defendants' severe debilitation of my personal, public and financial reputation: all of my money, my property, my accounts, and my trusts.

I demand the immediate removal of any and all trustees I do not know from any of my corporations and trusts; this includes trusts, either known or unknown to me from this time of filing retroactively to the time of inception, as well as life insurance policies and/or accounts that are either known or unknown to me. I also request a total revocation of any and all estate planning Mr. Watenmaker ever did in my name or any of my family members' names on my behalf. This includes revocation of any and all wills and estate documents that may have any of my family members designated as trustee including but not limited to my ex-wife, Ella Jolly and my brother, Dennis Quaid or any attorneys or accountants used.

Most of all, I just want my freedom, my rights, my royalties, and my true wealth returned to me so that I might once again live as a free man able to receive my income, pay my bills and taxes and ascertain my true value without interference from conversion, contract interference, invasion of privacy, false publicity, interference of perspective advantage and the creating of false evidence.

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