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SUPREME COURT  
STATE OF WASHINGTON  
Feb 26, 2016, 11:12 am  
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No. 73016-9-1

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IN THE COURT OF APPEALS  
OF THE STATE OF WASHINGTON  
DIVISION I

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Lorina Delfierro,

Appellant,

v.

BSI Financial Services; Del Toro Loan Servicing, Inc.; Mariners Investment Fund, LLC; Mariners Investment Fund II REO, LLC; Mariners Second Fund II REO, LLC; Second Mariners Investment Fund II REO, LLC; Second Mariners RES Fund II REO, LLC; American Default Management; PENSCO Trust Company Custodian FBO Jeffery D. Hermann, IRA Account Number 20005343; April Smith in her individual and official capacity; Teresa Cenicerros in her individual and official capacity; Jeffery D. Hermann in his individual and official capacity; Jennifer Tait in her individual and official capacity; and Steve Olson in his individual and official capacity.

Respondents.

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**SUPPLEMENT TO APPELLANTS' REPLY TO RESPONDENTS  
ANSWER TO APPELLANTS' PETITION FOR REVIEW**

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ORIGINAL

## DAMAGES

Plaintiffs home was a licensed operating Adult Family Home and was refinanced as such in 2007. This meant this house was her primary source of income and also home to from three to six vulnerable unrelated adults (clients). The nature of this business requires a higher than normal reputation for being responsible for the health of others but also to provide a stable, secure environment. To include being fiscally solvent.

Part of the oppositions tactics was to cause unnecessary expenses in litigation and place untrue information in public view to discourage clients from using appellants services.

Jennifer Tait misrecorded a public document that gave false notice to the world that appellant no longer owned her home. As well as redirected all the counties tax billing and appellants HOA correspondence to Tait's client Mariners 1 in appellant address. A mistake they admitted was a mistake and up to this day has not been corrected, this is ongoing character assassination. The need for appellant to close the home was created in a large part by this act.

At the direction of Steve Olson defendant ADM recorded a false notice of trustee sale by ADM for CT. When originally named in this suit ADM and CT stated the document was a mistake. Appellant accepted that

and released them from the suit but Olson and ADM have taken no steps to correct the false character diminishing public record. To this day persons running appellants name or address on the internet are told via the public records that her home is in foreclosure and belongs to Mariners 1. Detrimental to appellants ability to practice her profession. This too was responsible, in part, for appellants decision to close her home.

While in bankruptcy appellant followed her counsils advise and instigated what is known as a “ cram down” hearing. She was successful. Respondents filed an appeal knowing that a case had just been ruled on that made their appeal without merit. They proceeded anyway accepting a chastising by the appeals panel but unnecessarily depleting appellants fiscal ability to protect her rights.

Running the name and address on the internet is now common practice for those investigating homes in which to place the care of a loved one. Using the public records as a forum to discredit a person is an act that has an unknown scope of public impact and if not properly deterred will not only be continued to seriously damage others but also diminish the public trust of the public records system.

Respectfully submitted this 26<sup>th</sup> day of February, 2016.

**TRIAD LAW GROUP**



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## OFFICE RECEPTIONIST, CLERK

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**To:** Vita Tsinkevich  
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**Subject:** RE: Request for Filing of Brief / Court of Appeals-Division I / Case No. 73016-9

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Enclosed please find the following revised documents for filing:

- 1) Appellants' Reply to Respondents Answer to Appellants' Petition for Review; and
- 2) Supplement to Appellants' Reply to Respondents Answer to Appellants' Petition for Review.

Appellant is replying to Respondents Answer to Appellants original petition for review. There is also a supplement to Appellant's Reply. Hopefully, this helps clarify. If there is anything else I can do, please let me know.

Kind regards,

**From:** OFFICE RECEPTIONIST, CLERK [mailto:SUPREME@COURTS.WA.GOV]  
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**Importance:** High

Is the first filing of "Appellant's Reply Brief" intended to be an "Answer to a Petition for Review"? And is the second filing intended to be a "Supplement" to the Answer? If so, please indicate on the title page and refile.

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Enclosed is a supplement to the reply brief filed moments ago.

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Clerk:

Please file the attached **Appellants' Reply Brief** with the Supreme Court in case: **Lorina Delfierro vs. BSI Financial Services / Case No. 73016-9.**

This brief is being submitted by: Charles M. Greenberg, WSBA No. 17661  
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Best regards,

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