



of Windsor Pictures LLC, the company which hired and trained me to market bridge loans, in which Mr. Cortes became an investor. In or around 2013, the Managing Member, Dror Soref was arrested and charged with embezzling investors' funds. My sister, Michelle Seward, the owner of a sales company hired to promote insurance products, was also charged, but later exonerated of all charges. I was not charged with any wrong doing, nor did the State of California, nor the Department of Insurance file any criminal or civil action against me. The events that transpired where completely out of my control, in which I was a victim as well.

In fact, the embezzlement by Dror Soref, damage me, my family and hundreds of other families, including Mr. Cortes. My father and grandmother personally invested into Windsor Pictures LLC, and lost in excess of \$400,000.00 (four hundred thousand of dollars).

The Objectors attempts to falsely accuse me and Michelle Seward of breach of contract, fraud, securities violations, and conversion are inaccurate. In fact, the Objectors purposefully omitted the final outcome of the State of California's investigation findings into the incident. In fact, the State of California *dismissed in full with prejudice*, in the interest of justice, all charges against Michelle Seward. Please see the Attached Minutes of Order from Superior Court of Los Angeles: Case No. BA439544, labeled **EXHIBIT A**

To clarify, the allegations encompassing the lawsuit filed by Mr. Cortes (against Michelle Seward and Jeremy LeClair) outlined breach of contract, fraud, securities violations, and conversion surrounding events of the incident with Windsor Pictures, LLC. Yet, those similar allegations have been dismissed by the State of California, and therefore would hold no further

merit in a court of law. Mr. Weissman omitted this vital information from their recently filed Objection. Mr. Weissman is aware I was never allowed to defend myself against these false allegation, which now would become moot, based on the final investigation and findings of the State of California. If the State of California did not find fault with the company executive (Michelle Seward) hired by Windsor pictures, it would be near impossible to find fault with an employee (Jeremy LeClair) who was following company direction and procedure.

In addition, the judgment by default against me occurred because I was never served, nor had any previous knowledge of the lawsuit filed by Mr. Cortes. I was residing in North Carolina at the time. I did not attempt to avoid service. I was not allowed to discuss anything pertaining to this situation with my sister, or any parties involved with the State's investigation. I had moved to North Carolina in September 2012. I had a forwarding address in place, I was active on social media, and my friends and family possessed my address. In fact, my North Carolina residential address remained the same for 5-years.

Once I finally learned of the default judgement Mr. Cortes obtained, I was informed by multiple attorney's I would either be required to pay \$15,000 to \$20,000 in attorney's fees to file and litigate a Notice of Motion to Set Aside Default Judgement, or I could list the debt in a Bankruptcy Petition. At the time, I was residing in North Carolina, I filed for Bankruptcy on 6-12-2018. Since then my attorney has filed (7-26-2018) a Motion to Transfer Case to California, now that I am residing in this state.

In each of the Bankruptcy filings, Mr. Cortes is listed and was served/notified as a creditor. The address on all Bankruptcy filings for Mr. Cortes is listed as 2417 El Moreno La Cresenta, CA 91214. It is also confirmed by tax documents and county records, Mr. Cortes still owns this property under the *Jean Cortes and Alvaro Antonio Cortes Living Trust*, and receives mail at this location. The Bankruptcy filing listed Mr. Cortes proper address. Attached **EXHIBIT B**

In addition, I was under no obligation to serve Mr. Cortes with a copy of my Name Change Petition. The filing of the Name Change Petition was in no way an attempt to defraud Mr. Cortes as a creditor. In fact, I have been transparent in my Bankruptcy filings. Plus, once a Name Change Petition is granted, I would be required by law to update any and all court records, specifically including my Bankruptcy filing.

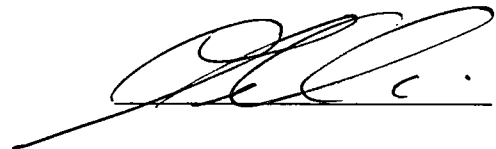
Therefore, Mr. Weissman's disparaging statement, that I am attempting to avoid the default judgment Mr. Cortes obtained against me, is an irrational and incorrect probability. The granting of the Name Change Petition in fact would not avoid a default judgment, nor allow an attempt to do so.

On a personal note, I feel tremendous sorrow for Mr. Cortes and how this must have affected him personally, and his family. I was never able to reach out to Mr. Cortes personally during these tragic events, it was forbidden by the State of California and the Department of Insurance during their investigation. My personal family members suffered a similar financial loss and tremendous emotion stress, and my sister was investigated for 5-years. The actions of Dror Soref ruined countless lives. In fact, Michelle Seward established a Re-payment Trust, which was

offered to all of the clientele harmed by the actions of Dror Soref. To my knowledge, the greater of 95% of the clients opted-into the Trust, and a few, such as Mr. Cortes, chose to file lawsuits. To date, I have been informed the income of the Trust has begun to pay out damages the clients, which will increase dramatically with the publishing (*Penguin Random House*) of Michelle Seward's book (*Perfectly Clear*) due out this fall.

In summary, the Objectors are attempting to argue an "objection to avoid judgment" in a venue, which is ill suited for such an objection. The correct venue, would in fact be the Bankruptcy Court and/or the Meeting of the Creditor to be held in California, once the Motion to Transfer Case is approved. It is also important for the Court to realize, that by the act of the Objectors submitting this Objection to the Name Change Petition, they are confirming they are fully aware of the Bankruptcy filing and Petition for Name Change; which they claimed to have not received.

Lastly, the granting the Name Change Petition for the benefit of legalizing an in-use name (Jeremy Wyatt), by Petitioner in many life circumstances and venues, from receiving mail, to business association promotions; would in fact not defraud any creditor, entity or person. The adjusted legal name would be required by law to be updated with the Bankruptcy proceedings, therefore the Objectors' arguments are ill suited and without merit.



Jeremy LeClair  
**Petitioner**  
2054 S Hacienda Blvd #5233  
Hacienda Heights, CA 91745  
**Email:** jeremy.leclair.email@gmail.com

CERTIFICATE OF SERVICE

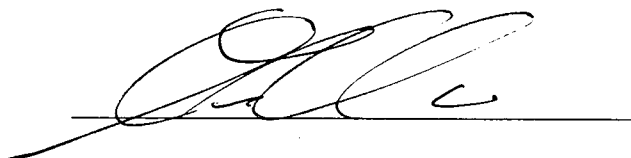
I hereby certify that I have served (on the date shown below) the attached Response & Objection upon all parties' legal representatives in this matter by mailing a copy of the Response & Objection with sufficient postage payment to ensure delivery, via the United States Postal Service, and in addition, I sent a copy via electronic communication (email) to the following parties;

I.Donald Weissman  
Weissman Law Firm  
5567 Reseda Boulevard, Suite 118  
Tarzana, CA 91356

*Attorney for Alvaro Cortes*

dweissman@idwlaw.com

This the 15th day of August 2018



Jeremy LeClair  
**Petitioner**  
2054 S Hacienda Blvd #5233  
Hacienda Heights, CA 91745  
**Email:** jeremy.leclair.email@gmail.com

CASE NO. **KS021358**

EXHIBIT A  
(attached Pages 8-11)

MINUTE ORDER  
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE PRINTED: 04/16/18

-----  
CASE NO. BA439544

THE PEOPLE OF THE STATE OF CALIFORNIA

VS.

DEFENDANT 01: MICHELLE KENEN SEWARD  
-----

NUNC PRO TUNC ORDER PREPARED. IT APPEARING TO THE COURT THAT THE MINUTE ORDER

IN THE ABOVE ENTITLED ACTION DOES NOT PROPERLY REFLECT THE COURT'S ORDER. SAID  
MINUTE ORDER IS AMENDED NUNC PRO TUNC AS OF THAT DATE. ALL OTHER ORDERS ARE TO  
REMAIN IN FULL FORCE AND EFFECT. DETAILS LISTED AT END OF THIS MINUTE ORDER.

INFORMATION FILED ON 12/02/16.

COUNT 01: 25110-25540(A) COR FEL  
COUNT 02: 25110-25540(A) COR FEL  
COUNT 03: 25110-25540(A) COR FEL  
COUNT 04: 25110-25540(A) COR FEL  
COUNT 05: 25110-25540(A) COR FEL  
COUNT 06: 25110-25540(A) COR FEL  
COUNT 07: 25110-25540(A) COR FEL  
COUNT 08: 25110-25540(A) COR FEL  
COUNT 09: 25110-25540(A) COR FEL  
COUNT 10: 25110-25540(A) COR FEL  
COUNT 11: 25110-25540(A) COR FEL  
COUNT 12: 25110-25540(A) COR FEL  
COUNT 13: 25110-25540(A) COR FEL  
COUNT 14: 25110-25540(A) COR FEL  
COUNT 15: 25110-25540(A) COR FEL

COUNT 16: 25401(B)-25540(B) CO FEL  
COUNT 17: 25401(B)-25540(B) CO FEL  
COUNT 18: 25401(B)-25540(B) CO FEL  
COUNT 19: 25401(B)-25540(B) CO FEL  
COUNT 20: 25401(B)-25540(B) CO FEL  
COUNT 21: 25401(B)-25540(B) CO FEL  
COUNT 22: 25401(B)-25540(B) CO FEL  
COUNT 23: 25401(B)-25540(B) CO FEL  
COUNT 24: 25401(B)-25540(B) CO FEL  
COUNT 25: 25401(B)-25540(B) CO FEL  
COUNT 26: 25401(B)-25540(B) CO FEL  
COUNT 27: 25401(B)-25540(B) CO FEL  
COUNT 28: 25401(B)-25540(B) CO FEL  
COUNT 29: 25401(B)-25540(B) CO FEL  
COUNT 30: 25401(B)-25540(B) CO FEL



CASE NO. BA439544  
DEF NO. 01

DATE PRINTED 04/16/18

OUNT 31: 25401(B)-25540(B) CO FEL  
OUNT 32: 25401(B)-25540(B) CO FEL  
OUNT 33: 25401(B)-25540(B) CO FEL  
OUNT 34: 25401(B)-25540(B) CO FEL  
OUNT 35: 25401(B)-25540(B) CO FEL  
OUNT 36: 25401(B)-25540(B) CO FEL  
OUNT 37: 25401(B)-25540(B) CO FEL  
OUNT 38: 25401(B)-25540(B) CO FEL  
OUNT 39: 25401(B)-25540(B) CO FEL  
OUNT 40: 25401(B)-25540(B) CO FEL  
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OUNT 43: 25401(B)-25540(B) CO FEL

OUNT 44: 25401(B)-25540(B) CO FEL  
OUNT 45: 25401(B)-25540(B) CO FEL  
OUNT 46: 25401(B)-25540(B) CO FEL  
OUNT 47: 25401(B)-25540(B) CO FEL  
OUNT 48: 25401(B)-25540(B) CO FEL  
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OUNT 65: 25401(B)-25540(B) CO FEL  
OUNT 66: 25401(B)-25540(B) CO FEL  
OUNT 67: 25401(B)-25540(B) CO FEL  
OUNT 68: 25401(B)-25540(B) CO FEL  
OUNT 69: 25401(B)-25540(B) CO FEL  
OUNT 70: 25401(B)-25540(B) CO FEL  
OUNT 71: 25401(B)-25540(B) CO FEL  
OUNT 72: 25541 COR FEL

ON 05/23/17 AT 830 AM IN CENTRAL DISTRICT DEPT 100

CASE CALLED FOR ARRAIGNMENT

PARTIES: SCOTT M. GORDON (JUDGE) STAN KADOHATA (CLERK)  
DIANA VAN DYKE (REP) RENEE CARTAYA (DA)

DEFENDANT IS NOT PRESENT IN COURT, BUT REPRESENTED BY DANIEL NIXON PRIVATE

PAGE NO. 2

ARRAIGNMENT  
HEARING DATE: 05/23/17

05/16/18



CASE NO. BA439544  
REF NO. 01

DATE PRINTED 04/16/18

COUNT (48) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (49) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (50) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (51) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (52) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (53) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (54) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (55) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (56) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (57) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (58) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (59) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (60) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
  
COUNT (61) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (62) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (63) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (64) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (65) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (66) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (67) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (68) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (69) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (70) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (71) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC  
COUNT (72) : DISPOSITION: DISMISSAL IN FURTH OF JUSTICE PER 1385 PC

DATE OF 7/11/17 IN DEPARTMENT 100 IS ADVANCED AND VACATED AT THE REQUEST OF BOTH COUNSEL. AT THE TIME OF ADVANCEMENT, COUNSEL AGREED THAT DEFENSE COUNSEL WOULD APPEAR 977 PENAL CODE FOR THE DEFENDANT.

PEOPLE'S MOTION TO DISMISS PURSUANT TO 1385 PENAL CODE IS GRANTED. CASE IS DISMISSED.  
IS. CARTAYA RECEIVES A CASHIERS CHECK FROM

DEFENSE COUNSEL MADE PAYABLE TO THE DISTRICT ATTORNEY'S OFFICE OR REFUNDED COMMISSIONS.

D.R. IS DISCHARGED.

MINUTE ORDER PREPARED ON 05-23-2017 BY STAN KADOHATA, JUDICIAL ASSISTANT. SAID MINUTE ORDER IS AMENDED AS FOLLOWS: NO CORRECTION NEEDED.

NEXT SCHEDULED EVENT:  
PROCEEDINGS TERMINATED

5/26/17 ARREST DISPOSITION REPORT SENT VIA FILE TRANSFER TO DEPARTMENT OF JUSTICE

I CERTIFY THAT THIS IS A TRUE CORRECT AND COMPLETE COPY OF THE ORIGINAL RECORD IN MY CUSTODY.

DATED: 4-16-18  
SHEPHERD CARTER, EXECUTIVE OFFICER/CLERK  
SOUTHERN DISTRICT,  
TOLSON COURTHOUSE  
COUNTY OF LOS ANGELES STATE OF CALIFORNIA



BY: A. A. [Signature] DEPUTY

CASE NO. **KS021358**

EXHIBIT B  
(attached Pages 13-16)

Fill in this information to identify your case:

United States Bankruptcy Court for the:

Western District Of North Carolina

Case number (if known): \_\_\_\_\_

Chapter you are filing under:

- Chapter 7
- Chapter 11
- Chapter 12
- Chapter 13

Check if this is an amended filing

Official Form 101

**Voluntary Petition for Individuals Filing for Bankruptcy**

12/17

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint case*—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, “Do you own a car,” the answer would be *yes* if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

**Part 1: Identify Yourself**

**About Debtor 1:**

**About Debtor 2 (Spouse Only in a Joint Case):**

**1. Your full name**

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

Jeremy  
First name  
Wyatt  
Middle name  
LeClair  
Last name  
\_\_\_\_\_  
Suffix (Sr., Jr., II, III)

\_\_\_\_\_  
First name  
\_\_\_\_\_  
Middle name  
\_\_\_\_\_  
Last name  
\_\_\_\_\_  
Suffix (Sr., Jr., II, III)

**2. All other names you have used in the last 8 years**

Include your married or maiden names.

\_\_\_\_\_  
First name  
\_\_\_\_\_  
Middle name  
\_\_\_\_\_  
Last name  
\_\_\_\_\_  
First name  
\_\_\_\_\_  
Middle name  
\_\_\_\_\_  
Last name

\_\_\_\_\_  
First name  
\_\_\_\_\_  
Middle name  
\_\_\_\_\_  
Last name  
\_\_\_\_\_  
First name  
\_\_\_\_\_  
Middle name  
\_\_\_\_\_  
Last name

**3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)**

xxx - xx - 1 7 8 1  
OR  
**9** xx - xx - \_\_\_\_\_

xxx - xx - \_\_\_\_\_  
OR  
**9** xx - xx - \_\_\_\_\_

06/16/19

Part 2: List All of Your NONPRIORITY Unsecured Claims

3. Do any creditors have nonpriority unsecured claims against you?

- No. You have nothing to report in this part. Submit this form to the court with your other schedules.
Yes

4. List all of your nonpriority unsecured claims in the alphabetical order of the creditor who holds each claim. If a creditor has more than one priority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. Do not list claims already included in Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3. If you have more than four priority unsecured claims fill out the Continuation Page of Part 2.

4.1 Alliance One Receivable Management
Nonpriority Creditor's Name
4850 Street Road Suite 300
Treose PA 19053
Who incurred the debt? Debtor 1 only
Is the claim subject to offset? No

Total claim \$2,403.23
Last 4 digits of account number 7 2 1 7
When was the debt incurred? 2015
As of the date you file, the claim is: Contingent, Unliquidated, Disputed
Type of NONPRIORITY unsecured claim: Other. Specify Collections for Capital One

4.2 Alvaro Cortes
Nonpriority Creditor's Name
2417 El Moreno
La Crescenta CA 91214
Who incurred the debt? Debtor 1 only
Is the claim subject to offset? No

Last 4 digits of account number
When was the debt incurred?
As of the date you file, the claim is: Contingent, Disputed
Type of NONPRIORITY unsecured claim: Other. Specify Judgment

4.3 American Profit Recovery
Nonpriority Creditor's Name
34405 W. 12 Mile Road Suite 379
Farmington Hills MI 48331
Who incurred the debt? Debtor 1 only
Is the claim subject to offset? No

Last 4 digits of account number 4 3 5 2
When was the debt incurred? 03/2015
As of the date you file, the claim is: Contingent, Disputed
Type of NONPRIORITY unsecured claim: Other. Specify Collections for Community One Bank

06/16/18

Alliance One Receivable Management  
4850 Street Road  
Suite 300  
Trevose, PA 19053

Alvaro Cortes  
2417 El Moreno  
La Crescenta, CA 91214

American Profit Recovery  
34405 W. 12 Mile Road  
Suite 379  
Farmington Hills, MI 48331

Barbara Lewin  
27723 Heartwood Court  
Valencia, CA 91354

Bartel Construction  
PO BOX 2487  
Cornelius, NC 28031

Bloomingdales  
1000 3rd Ave  
New York, NY 10022

Capital One  
1680 Capital One Dr.  
McLean, VA 22102

Capital One Bank  
26525 N. Riverwoods Blvd. Suite 100  
Mettawa, IL 60045

Capitol One Auto Financing  
PO Box 60511  
City of Industry, CA 91716

UNITED STATES BANKRUPTCY COURT  
Western District of North Carolina

In re: Jeremy Wyatt LeClair  
Debtors

Case No. \_\_\_\_\_  
Chapter 7

VERIFICATION OF CREDITOR MATRIX

The above named debtor(s), or debtor's attorney if applicable, do hereby certify under penalty of perjury that the attached Master Mailing List of creditors is complete, correct and consistent with the debtor's schedules pursuant to Local Bankruptcy Rules and I/we assume all responsibility for errors and omissions.

Dated: June 12, 2018

Signed: /s/ Jeremy Wyatt LeClair

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

**/s/Michael K. Elliott**  
**Michael K. Elliott**  
**Attorney for Debtor(s)**  
**Bar no.: 31505**  
**13420 Reese Blvd. W.**  
**Huntersville, North Carolina 28078**  
**Telephone No: (704) 947-3838**  
**Fax No: (704) 947-6547**

**E-mail address:**  
**mike@elliottlawfirm.net**