

Exhibit B

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7 **UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA**

8 In re:) Case No.: 15-10110-LED
9)
10 AMERI-DREAM REALTY, LLC,) Chapter 7
11)
Debtor.)
12)
13 VICTORIA NELSON, In her Capacity As The) Adv. No.: 15-01087-LED
Chapter 7 Trustee of AMERI-DREAM)
14 REALTY, LLC,)
15)
Plaintiff,) Hearing Date: October 26, 2015
16 v.) Hearing Time: 1:30 p.m.
17)
18 ELSIE PELADAS-BROWN,)
Defendant.)
_____)

19 **DECLARATION OF KYLE EDWARDS IN SUPPORT OF**
20 **PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

21 Kyle Edwards, being duly sworn, deposes and says in his capacity as the principal of
22 Edwards Group International, LLC:

23 1. I am the principal of Edwards Group International, LLC, a private investigation
24 company, and I am a former chief law enforcement officer with the Las Vegas Metropolitan
25 Police Department, and was employed as the Deputy Chief of Investigations. I have over 30
26 years of investigative experience.
27

1 2. I am over the age of 18, mentally competent, and unless otherwise indicated, I
2 have personal knowledge of the facts set forth herein.

3 3. I was retained by counsel for the Plaintiff in the above-referenced case to
4 investigate whether John M. Brown (“**Mr. Brown**”) had any apparent involvement in the taking
5 of approximately \$1,200,000.00 of tenant security deposit money from Ameri-Dream Realty,
6 LLC (the “**Company**”) in 2014.

7
8 4. I researched the background of Mr. Brown, and as of today’s date, I determined
9 Mr. Brown is not the target of any criminal charges in connection with this case, or any other
10 criminal matters. My research indicated that Mr. Brown complied with the local police and
11 authorities, voluntarily gave a statement and turned over all records in his possession. Mr.
12 Brown does not have a prior criminal record, and my research determined he is only a defendant
13 in one civil case, which appears to relate to the Debtor.

14
15 5. Based on my research, I found no evidence Mr. Brown was involved in the taking
16 of the security deposits or that he had any prior knowledge of his ex-wife’s plan.

17 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
18 and correct.

19 Dated this 28th day of August, 2015.

20
21 /s/ Kyle Edwards
22 Kyle Edwards

23 *Kyle Edwards*
24
25
26
27