

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

_____	)	
JESSE E. TORRES III	)	
JENNIFER J. ADAMS	)	
Plaintiffs	)	
vs.	)	Civil Action No. _____
SOPHIE J. TORRES	)	
JESSE E. TORRES IV	)	
DEBTMERICA, LLC.	)	
DONALD F. TORRES	)	
Defendants	)	
_____	)	

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Demand for Jury Trial

Attestation of Jennifer J. Adams for the Translation of Exhibit "B"

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III  
JENNIFER J. ADAMS  
Plaintiffs

vs.

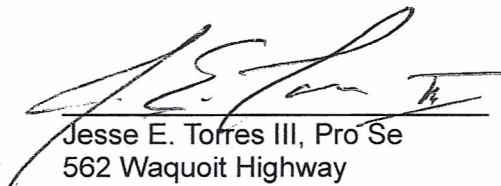
SOPHIE J. TORRES  
JESSE E. TORRES IV  
DEBTMERICA, LLC.  
DONALD F. TORRES  
Defendants

Civil Action No. \_\_\_\_\_

**NOTICE OF APPEARANCE**

TO THE CLERK OF THE ABOVE NAMED COURT:

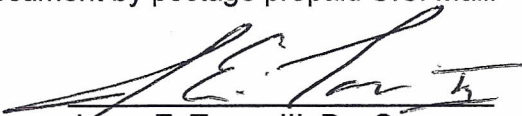
Notice is hereby given that Plaintiff Jesse E. Torres III is representing himself Pro Se in the above-captioned action.

  
Jesse E. Torres III, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862

Dated July 21, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on July 21, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
Jesse E. Torres III, Pro Se

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III  
JENNIFER J. ADAMS  
Plaintiffs

vs.

SOPHIE J. TORRES  
JESSE E. TORRES IV  
DEBTMERICA, LLC.  
DONALD F. TORRES  
Defendants

Civil Action No. \_\_\_\_\_

**NOTICE OF APPEARANCE**

TO THE CLERK OF THE ABOVE NAMED COURT:

Notice is hereby given that Plaintiff Jennifer J. Adams is representing herself Pro Se in the above-captioned action.




Jennifer J. Adams, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862

Dated July 21, 2011

**CERTIFICATE OF SERVICE**

I, Jennifer J. Adams, hereby certify that on July 21, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
Jennifer J. Adams, Pro Se

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III

JENNIFER J. ADAMS

Plaintiffs

vs.

SOPHIE J. TORRES

JESSE E. TORRES IV

DEBTMERICA, LLC.

DONALD F. TORRES

Defendants

Civil Action No. \_\_\_\_\_

**EX PARTE MOTION FOR RESTRAINING ORDER**

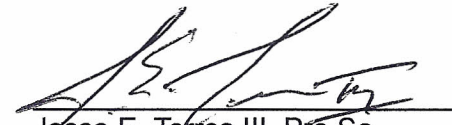
The Plaintiffs move this Court to issue a Restraining Order to protect the Plaintiffs from bodily and emotional harm by the Defendant Donald F. Torres and his associates.

In support of this motion, the Plaintiffs reallege and reassert paragraphs 1 through 134 of their Complaint, which are incorporated herein by reference and further that:

1. the filing of this action will more likely than not, place the Plaintiffs health, well-being and lives in danger, as the Defendant Donald F. Torres and his associates have threatened and intimidated the Plaintiffs in the past, and
2. this action sets forth, and clearly documents the history of said Defendant, whose actions are part of the numerous RICO violations set forth in this action, and
3. this action sets forth numerous international and interstate acts of extortion, violence and intimidation against the Plaintiffs by said Defendant and his associates, including well documented threats on their lives.

**WHEREFORE**, the Plaintiffs pray that this Court issue an order:


1. prohibiting Defendant Donald F. Torres and his associates from coming within one-thousand (1000) yards of the Plaintiffs, and
2. [that] the Defendant Donald F. Torres and his associates be prohibited from communicating any threats against the Plaintiffs, and
3. any other protections as this Court deems just and proper.

  
Jesse E. Torres III, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862

Dated July 21, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on July 20, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
Jesse E. Torres III, Pro Se

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III )

JENNIFER J. ADAMS )

Plaintiffs )

vs. )

SOPHIE J. TORRES )

JESSE E. TORRES IV )

DEBTMERICA, LLC. )

DONALD F. TORRES )

Defendants )

Civil Action No. \_\_\_\_\_

**EX PARTE MOTION TO MAINTAIN STATUS QUO**

The Plaintiffs move this Court to issue an order to maintain Status Quo at the residence and office of the Plaintiffs, located at 562 Waquoit Highway, East Falmouth, MA 02536 (hereafter referred to as Property).

In support of this motion, the Plaintiffs reallege and reassert paragraphs 1 through 134, of their Complaint, which are incorporated herein by reference, and include the attachments of their Complaint as if specifically attached hereto, and set forth:

1. the Plaintiffs have, for more than four (4) years lived harmoniously on the Property with the Defendant Sophie J. Torres, and
2. [that] the Property is one of the properties that is the subject of this action, and
3. [that] there is a binding contract between Defendant Sophie J. Torres and Plaintiff Jesse E. Torres III that is part of this action, see Complaint attachment, exhibit "A" and
4. [that] the above referenced contract is clear and concise in that property rights to the Property were permanently and persistently transferred to Plaintiff Jesse E. Torres III on April 24, 2009, and
5. [that] there are two separate residences on the property, and
6. [that] the Plaintiffs have been living in, and have an office in the rear of the property, and
7. [that] the Defendant Sophie J. Torres resides in a house on the front of the property, and
8. [that] the Plaintiffs have spent considerable monies on the Property for improvements in reliance on the above referenced contract, and
9. [that] the Plaintiffs did, and will continue to maintain the considerable grounds on the property



provide for herself, and


10. [that] this action clearly sets forth that the Defendants Donald F. Torres and Jesse E. Torres IV did, and are, manipulating and coercing the Defendant Sophie J. Torres, and
11. [that] a significant part of said Defendants' ability to manipulate the Defendant Sophie J. Torres is based on the fact that she is now financially dependent on said Defendants, and
12. [that] said Defendants have cut off their financial support to Defendant Sophie J. Torres in the past, for her not making a real estate decision that said Defendants approved of, and
13. [that] the Complaint to this action clearly demonstrates that the Defendants Donald F. Torres, and now Jesse E. Torres IV are part of a long running criminal conspiracy to punish the Plaintiff Jesse E. Torres III for not giving in to their criminal attempts to extort monies from Plaintiff Jesse E. Torres III, and
14. [that] the Defendant Sophie J. Torres, under the effective control of said Defendants may attempt to have the Plaintiffs removed from the "*Jointly-Owned*" property, and
15. [that] this would cause tremendous harm to the Plaintiffs, literally making them homeless and without a place to work, and
16. [that] the Plaintiffs assert that there is no direct benefit to, nor reason for the Defendant Sophie J. Torres to remove the Plaintiffs from their "*Jointly-Owned*" property, and
17. [that] the only effects on the Defendant Sophie J. Torres would be negative, as she would not have anyone to maintain her grounds and provide the considerable other services provided by the Plaintiffs, and
18. [that] the sole purpose of removing the Plaintiffs from the Property would be to continue the long reign of terror by the Defendant Donald F. Torres, now assisted by Defendant Jesse . E. Torres IV and
19. [that] the ownership of the Property is a question now before this Court. We assert that the evidence weighs heavy in favor of the Plaintiffs, and has not been adjudicated, and
20. therefore the Defendants have no standing to remove the Plaintiffs from the, at best, "*Jointly Owned*" property, and
21. [that] the sole reason that the Plaintiffs have brought forth this motion, is that the Defendants have already threatened the Plaintiffs, and stated they would be evicted from their own property, their home and office, if they brought forth this very action.

**WHEREFORE**, the Plaintiffs pray that this Court issue an order:

1. to maintain the status quo and that the Plaintiffs be allowed to stay on the property that is a part of this action, as they have done for over four (4) years.
2. any other relief as this Court deems just and proper.

**AND IN THE ALTERNATIVE**, the Plaintiffs pray that this Court issue an order:

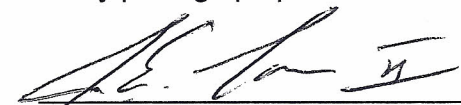
1. Placing this property under the jurisdiction of this Court.
2. Enjoining the Defendants from taking action in any other court on this matter.
3. Any other relief as this Court deems just and proper.

  
\_\_\_\_\_  
Jesse E. Torres III, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862

Dated July 21, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on July 21, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
\_\_\_\_\_  
Jesse E. Torres III, Pro Se



COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III

JENNIFER J. ADAMS

Plaintiffs

vs.

SOPHIE J. TORRES

JESSE E. TORRES IV

DEBTMERICA, LLC.

DONALD F. TORRES


Defendants

Civil Action No. \_\_\_\_\_

**DEMAND FOR JURY TRIAL**

TO THE CLERK OF THE ABOVE NAMED COURT:

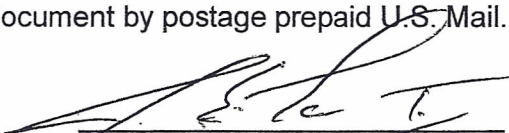
The Plaintiffs in the above-captioned action do herein demand a jury trial in accordance with the Massachusetts Civil Procedure Rule 38.

  
\_\_\_\_\_  
Jesse E. Torres III, Pro Se  
562 Waquoit Highway  
East Falmouth, MA 02536  
(617) 291-0862

Dated July 21, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on July 21, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
\_\_\_\_\_  
Jesse E. Torres III, Pro Se

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DONALD F. TORRES

Defendants

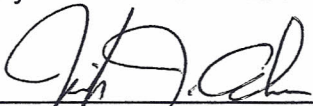
Civil Action No. \_\_\_\_\_

**ATTESTATION OF JENNIFER J. ADAMS FOR THE TRANSLATION OF EXHIBIT "B"**

Various attachments to the Complaint of this action are documents from the various Law Enforcement offices in Mexico, such as the Mexican equivalent of the District Attorneys Office. The original documents were, and are, in Spanish. They have been translated to English by the Plaintiff Jennifer J. Adams. Copies of the original Spanish versions and the translated English versions are attached to this actions Complaint.

**ATTESTMENT**

I Jennifer J. Adams of Barnstable, County, Massachusetts, did personally translate the above-captioned documents and did so to the best of my abilities; I believe the translated documents accurately reflect the content of the original documents.

  
Jennifer J. Adams

July 21, 2011  
Date

Dated July 21, 2011

**CERTIFICATE OF SERVICE**

I, Jesse E. Torres III, hereby certify that on July 21, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

  
Jesse E. Torres III, Pro Se