William J. Paatalo

Private Investigator – Oregon PSID# 49411
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Curriculum Vitae

William Paatalo has been a licensed private investigator since September of 2009. He has 17 years combined experience in both law enforcement and the mortgage industry. He was a police officer with the St. Paul, Minnesota Police Department from 1990-1996 where he was assigned "Field Training Officer" duties in only his second year on the job, and also received multiple commendations.

Mr. Paatalo worked in the mortgage industry as a "loan officer" with Conseco Home Finance from 1999 – 2000, followed by two years of being a branch manager for multiple mortgage brokering firms. From 2002 – 2008, he became the President of Midwestern Mortgage, LLC f/k/a Wissota Mortgage, LLC in Wisconsin and Minnesota.

Mr. Paatalo has worked exclusively over the last 4- years investigating foreclosure fraud and issues related to the securitization of residential and commercial mortgage loans. He is a Certified Forensic Mortgage Loan Auditor through ("CFLA"), and has spent more than 8,000 hours conducting investigatory research specifically related to mortgage securitization and chain of title analysis. He has performed such analyses for residential real estate located in many states, including, but not limited to Washington, Oregon, California, Nevada, Florida, Montana, Texas, Arizona, Ohio, New Jersey, and several other states. To date, Mr. Paatalo has conducted well over 700 investigations, and has become one of the leading experts in this new field.

Relevant Experience:

- Police Officer / "Field Training Officer" St. Paul, MN 1990-1996.
- Oregon licensed private investigator under ORS 703.430, and has met the necessary requirements under ORS 703.415.
- Member of the "Oregon Association of Licensed Investigators" (OALI.)
- President of Midwestern Mortgage, LLC f/k/a Wissota Mortgage, LLC in Wisconsin and Minnesota from 2002 – 2008.

Education:

A.A.S. – Law Enforcement – Normandale C.C., Bloomington, MN – 1986 Marketing Management Certificate – Concordia University, St. Paul, MN 2001 Forensic Loan Auditor Certification Training Course (CFLA) – 32 hrs. – San Diego, CA 2011

Expert Testimony:

FEDERAL CASES

Mickelson v. Chase Home Finance, LLC, et, al. U.S. District Court., Western District Of Washington at Seattle No. 2:11-cv-01445

<u>Workum v. Washington Mutual Bank, et al. – U.S. Bankruptcy Court, District of Arizona</u> <u>Adversarial No: 2:12-ap-01418-SSC</u>

<u>Javaheri v. JPMorgan Chase Bank N.A. – U.S. District Court, Central District of California - Case No. CV-10-8185-ODW</u>

<u>Del Piano v. MERS, et al. – U.S. District Court, District of Hawaii - Case No. CV-11-00140-SOM-BMK</u>

<u>JPMorgan Chase v. Dixon – U.S. District Court, Southern District of Texas - Case No. 3:10-CV-329</u>

Robert T. Fanning, Debtor – U.S.Bankruptcy Court, District of Montana – BK Case No. 10-61660

<u>Coward v. JPMorgan Chase, U.S. District Court, Eastern District of CA – Case No. 2:11-cv-</u>03378-GEB

Hoang v. Bank of America, U.S. BK Court, Northern District of CA - Case No. 11-55197-ASW

<u>In Re: Mlynarczyk – Debtors – U.S. BK Court – District of Arizona – Case No. 2:10-bk-07403-RTBP.</u>

<u>Rivera v. Deutsche Bank National Trust Company, U.S. BK Court, Northern CA – Oakland – Case No. 12-49703-MEH-13, Adversary # 13-4008.</u>

<u>Fareed: Sephery-Fard v. Greenpoint Mortgage Funding, Inc. et al., U.S. District Court Northern</u> <u>District of CA – Case No. unknown.</u>

STATE CASES

CALIFORNIA

<u>Gates v. MGC, et al. – In The Court of Appeal For The Court of California, 2nd Appellate</u> District, Division Six - Case No. 2d-Civil No. B239793

Washington v. ReconTrust Company, et al. – Superior Court For The State Of California, County Of Riverside, Riverside Court - Case No. RIC-1115435

<u>Blue Mountain Mortgage, LLC v. March – Superior Court of CA, San Francisco County – Housing Court, Case No. CUD-13-644342.</u>

Ramirez v. JPMorgan Chase Bank, N.A., et al., In The Superior Court of CA, County of Stanislaus, Case No. 680567.

<u>F. Wood Boyce v. TD Service Company, et al. – Superior Court For The State Of California, County Of Santa Barbara - Case No. unknown.</u>

<u>Kevin J. Fidel, et al., v. The Bank of New York Mellon as Trustee, et al. – Superior Court For The State Of California, County Of Orange, Central Justice Center - Case No. 30-2013-00671036.</u>

NORTH CAROLINA

<u>Ingle / Ellis Sub. Trustee v. Long — State Of North Carolina General Court of Justice, Superior Court Division - Case No. 11-SP-009384</u>

<u>In The Matter of Foreclosure – Panico – State Of North Carolina, Iredell County, General</u> <u>Court of Justice, Superior Court Division - Case No. 11-SP-947</u> <u>In The Matter of Foreclosure – Maleragno – State Of North Carolina, Mecklenburg County,</u> General Court of Justice, Superior Court Division - Case No. 10-SP-12076

<u>Sandra S. Cowart v. Bank of America, N.A., et al., – State Of North Carolina, In The County of</u> Guilford - Case No. 13-CVS-10385.

FLORIDA

<u>Deutsche Bank Trust Company v. Kass – In The Circuit Court Of The Seventeenth Judicial</u> <u>District In And For Broward County Florida – Case No. 09-09002(04)SJ</u>

Wells Fargo Bank, N.A. v. Sammons et al., In The Circuit Court of The Twentieth Judicial Circuit of Florida, In And For Lee County Florida, Case No. 13CA52663.

One West Bank, FSB v. Heseman, et al., In The Circuit Court of The Seventeenth Judicial Circuit of Florida, In And For Broward County, Case No. 2009-CA 053546(8).

JPMorgan Chase Bank, N.A. v. Prestar Homes And Rentals, Inc., et al., In The Circuit Court Of The Ninth Judicial Circuit, In And For Orange County Florida, Case No. 48-2009-CA-008407 O.

<u>U.S. Bank, N.A. as Trustee v. John M. Roesch, In The Circuit Court Of The Sixth Judicial</u> Circuit, In And For Pinellas County Florida, Case No. :52-2012-CA-012635

Wells Fargo Bank, N.A. v. Niclose Sammons, In The Circuit Court Of The Twentieth Judicial Circuit, In And For Lee County Florida, Case No.:13CA52663.

<u>The Bank of New York Mellon as Trustee v. Kenneth B. Kaye Jr., In The Circuit Court Of The Sixth Judicial Circuit, In And For Pinellas County Florida, Case No. Unknown.</u>

The Bank of New York Mellon as Trustee v. Douglas Didrick et al.,, In The Circuit Court Of The Twentieth Judicial Circuit, In And For Collier County Florida, Case No.:12-CA-3870.

<u>Deutsche Bank, N.A. as Trustee v. Patrick O'Keefe, et al., , In The Circuit Court Of The Fifth</u> <u>Judicial Circuit, In And For Marion County Florida, Case No. :42-2012-CA003273-AXXX-XX.</u>

GEORGIA

<u>Winkler v. JPMorgan Chase Bank, N.A., et al. In The Superior Court Of Cherokee County, State of Georgia – Case No. Unknown</u>

OHIO

Washington Mutual Bank fka Washington Mutual Bank, F.A. v. Jon A. Smetana, et al., In The Court of Common Pleas, Cuyahoga County, Ohio Case No.CV-08-652392.

JPMorgan Chase Bank, N.A. v. Michael M. Stevens, et al., In The Court of Common Pleas, Cuyahoga County, Ohio, Case No. CV-13-803622.

JPMorgan Chase Bank, N.A. v. Christopher Ardern, et al., In The Court of Common Pleas, Lake County, Ohio, Case No. 12CF000958.

OREGON

<u>Wells Fargo Bank, N.A. v. Mantell – Circuit Court For The State Of Oregon, County Of</u> <u>Multnomah - Case No. 1111-15457</u>

<u>U.S. Bank, N.A.as Trustee v. Natache D. Rinegard-Guirma, et al. - Circuit Court For The State</u> <u>Of Oregon, County Of Multnomah - Case No. 1112-16030</u>

<u>The Bank of New York Mellon as Trustee, et al., v. Nettleton – In The Circuit Court For The State of Oregon – County of Deschutes, Case No. 12-CV-0288.</u>

<u>The Bank of New York Mellon as Trustee v. Brian D. Ortman, In The Circuit Court For The State of Oregon – County of Deschutes, Case No. 12-CV-0813.</u>

<u>The Bank of New York Mellon as Trustee v. Kenneth Brown, In The Circuit Court For The State of Oregon – County of Jackson, Case No. 130845E2.</u>

<u>U.S. Bank N.A. as Trustee v. Jerry C. Reeves, et al., In The Circuit Court For The State of Oregon – County of Douglas, Case No. 13CV2112CC.</u>

<u>Citimortgage, Inc. v. Mathew H. Corcoran, In The Circuit Court For The State of Oregon – County of Washington, Case No. C12-4029CV.</u>

MINNESOTA

<u>In The Matter of THE Petition of JPMorgan Chase Bank, N.A. – State Of Minnesota County of Hennepin, Distric Court – Fourth Judicial District Case No. 27-ET-CV-10-209.</u>

MONTANA

<u>Kerr v. BAC Home Loan Servicing, et al – In The Twenty Second Judicial District For The State</u> <u>Of Montana, County Of Carbon – Case No. Unknown</u>

Ocwen Loan Servicing, LLC, et al v. Rehm – In The Eighteenth District Court For The State Of Montana, County Of Gallatin - Case No. DV-1217B

Philip J. and Ubon Slagter v. Citibank, N.A. as Trustee, In The Twenty First Judicial District For The State Of Montana, County Of Ravali – Case No. DV-13-447.

NEW YORK

<u>BAC Home Loan Servicing, LP v. Paul A. Amelio, Supreme Court of the State of New York – Index No. 1302977/2009.</u>

NEW MEXICO

<u>Deutsche Bank Trust Company Americas as Trustee v. Robert Todd, et al., , State of New Mexico, County of Santa Fe, First Judicial District, Case No. D-101-CV-2011-02730.</u>

PENNSYLVANIA

<u>Bank of America, N.A. v. Alfonso Amelio, v. Allegheny Court of Common Pleas— Case No. GD-</u>09-010436.