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5 *Attorneys for Receiver,*  
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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**03/04/2022** at 03:03:00 PM  
Clerk of the Superior Court  
By Maria Acevedo, Deputy Clerk

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7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN DIEGO

10  
11 PEOPLE OF THE STATE OF CALIFORNIA,  
by and through the COMMISSIONER OF  
12 FINANCIAL PROTECTION AND  
INNOVATION,

13 Plaintiff,

14 v.

15 SILVER SADDLE COMMERCIAL  
16 DEVELOPMENT, LP, a California limited  
partnership; SILVER SADDLE RANCH &  
17 CLUB, INC., a California corporation; THE  
GALILEO COMMERCIAL PROPERTY  
18 OWNERS ASSOCIATION, INC., a California  
non-profit corporation; THOMAS M. MANEY,  
19 an individual; ACCELERATED ASSETS, LLC,  
an Arizona limited liability company; SS  
20 PURCHCO, LLC, a Delaware limited liability  
company; PAHRUMP VALLEY REAL  
21 ESTATE CO., LLC, a Nevada limited liability  
company; and DOES 1 through 100, inclusive,

22 Defendants.

23 And,

24 MARIAN G. DUCREUX, an individual;  
25 CLIFFORD J. REYNOLDS, an individual;  
WAYNE A. PEDERSEN, an individual; and  
26 Relief Does 1 through 10, inclusive,

27 Relief Defendants.  
28

Case No. 37-2019-00049151-CU-MC-CTL

**DECLARATION OF TERESIA  
KNIGHT IN SUPPORT OF  
RECEIVER'S MOTION TO APPROVE  
SALE OF GALILEO PROJECT LAND**

**IMAGED FILE**

Judge: Hon. Joel R. Wohlfeil  
Dept.: C-73  
Hearing Date: April 15, 2022  
Time: 9:00 a.m.

Action filed: September 9, 2019  
Trial Date: May 6, 2022

1 I, Teresia Knight, hereby declare as follows:

2 1. I am over the age of eighteen (18) and I have personal knowledge of the facts set  
3 forth in this Declaration and, if called as a witness, I could and would competently testify to the  
4 facts stated herein.

5 2. I make this declaration in connection with the Receiver's concurrently filed  
6 Motion to Approve Sale of Galileo Project Land.

7 3. I am a licensed real estate agent and Senior Vice President at Kidder Mathews. I  
8 specialize in the sale of retreat/camp properties throughout California as well as in commercial  
9 real estate sales and leasing throughout the Inland Empire area of Southern California. For the  
10 past 23 years, I have been a top producing agent, and have consistently been recognized as a top  
11 producer and a noted top broker in the industry. On a yearly basis, I am involved in over two  
12 million square feet worth of transactions.

13 4. On or about May 6, 2020, I was retained by Thomas W. McNamara, the Court-  
14 appointed Receiver of the Receivership Defendants (Silver Saddle Commercial Development,  
15 LP, Silver Saddle Ranch & Club, Inc., and The Galileo Commercial Property Owners  
16 Association, Inc.) to market and sell real property owned by the Receivership Defendants.

17 5. On May 8, 2020, I arranged for the property located at 20751 Aristotle Drive,  
18 California City, CA 93505 (approximately 288 acres (APN 457-020-12, 457-020-27, and 457-  
19 020-05) comprising the Silver Saddle Ranch & Club and referred to herein as the "Ranch") to be  
20 listed for sale.

21 6. From the time of listing until the time the sale was submitted for the Court's  
22 approval on October 13, 2020, with the exception of the period of time during which it was  
23 under contract, I actively marketed the Ranch. Kidder Mathews and I prepared a unique  
24 marketing strategy for the Ranch which is described in greater detail in my declaration filed in  
25 support of the Receiver's second motion to approve the sale of the Silver Saddle Ranch.

26 7. Following the cancellation of escrow for the Ranch's original buyer, Kevin  
27 Feterik, on or about August 21, 2020, I began marketing the Galileo Project Land on Monday,  
28 August 24, 2020. During that week, I arranged for 7,724 emails to be sent out advertising the

1 property, made personal contact with the 48 individuals who previously expressed an interest in  
2 the Ranch (the “Interested Parties”), and distributed brochures and information to various  
3 brokers throughout the week. When I contacted the Interested Parties, I provided them with  
4 certain due diligence materials (including a preliminary title report and seller disclosures) and  
5 informed them that they would be given another opportunity to tour the property if they were  
6 interested. On September 1, 2020, a sign advertising the property was set up. Three parties  
7 toured the Galileo Project Land on Friday, September 4, 2020, and a fourth toured on Friday,  
8 September 11, 2020.

9 8. A true and correct copy of a brochure advertising the Galileo Project Land for sale  
10 is attached hereto as Exhibit 1.

11 9. Two of the Interested Parties who were contacted during this best and final round  
12 submitted offers to the Receiver. The Receiver informed me that neither offer was acceptable  
13 and that I should continue to market both the Ranch and the Galileo Project Land (which had  
14 remained listed during the entirety of the best and final round), which I did.

15 10. Aaron Mamann, the Proposed Buyer, initially made an offer of \$1.8 million for  
16 the Ranch, with a concurrent offer for \$600,000 for the Galileo Project land.

17 11. Four days later, Mr. Mamann contacted me with a new, increased offer of \$1.9  
18 million for the Ranch and \$650,000 for the Galileo Project land.

19 12. On September 23, 2020, I conveyed the Receiver’s counteroffer of \$2.1 million  
20 for the Ranch and \$900,000 for the Galileo Project land to Mr. Mamann and another party who  
21 submitted an offer through me.

22 13. Mr. Mamann informed me that he would accept the Receiver’s counteroffer and  
23 on September 28, 2020 the Receiver agreed. On September 29, 2020, I arranged for escrow to  
24 be opened. The title company notified me when Mr. Mamann subsequently deposited \$100,000  
25 into escrow in compliance with the terms of the purchase agreement.

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**EXHIBIT INDEX**

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**Exhibit**

**Page**

1 Galileo Project Land Sales Brochure ..... 1

# EXHIBIT 1



# FOR SALE



**Kidder  
Mathews**

Vacant land consisting of approximately 1,021.94 acres

PRICE: \$919,746.00 (\$900.00 PER ACRE) | CALIFORNIA CITY, CA

# TABLE OF CONTENTS

## EXCLUSIVELY LISTED BY

**TERESIA KNIGHT**

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LIC N° 01228241

[KIDDER.COM](http://KIDDER.COM)

**01**

**PROPERTY OVERVIEW**

**02**

**SITE MAP**

**03**

**ZONING MAP**

**04**

**AERIAL**

**05**

**PROPERTY PHOTOS**

### Disclaimer

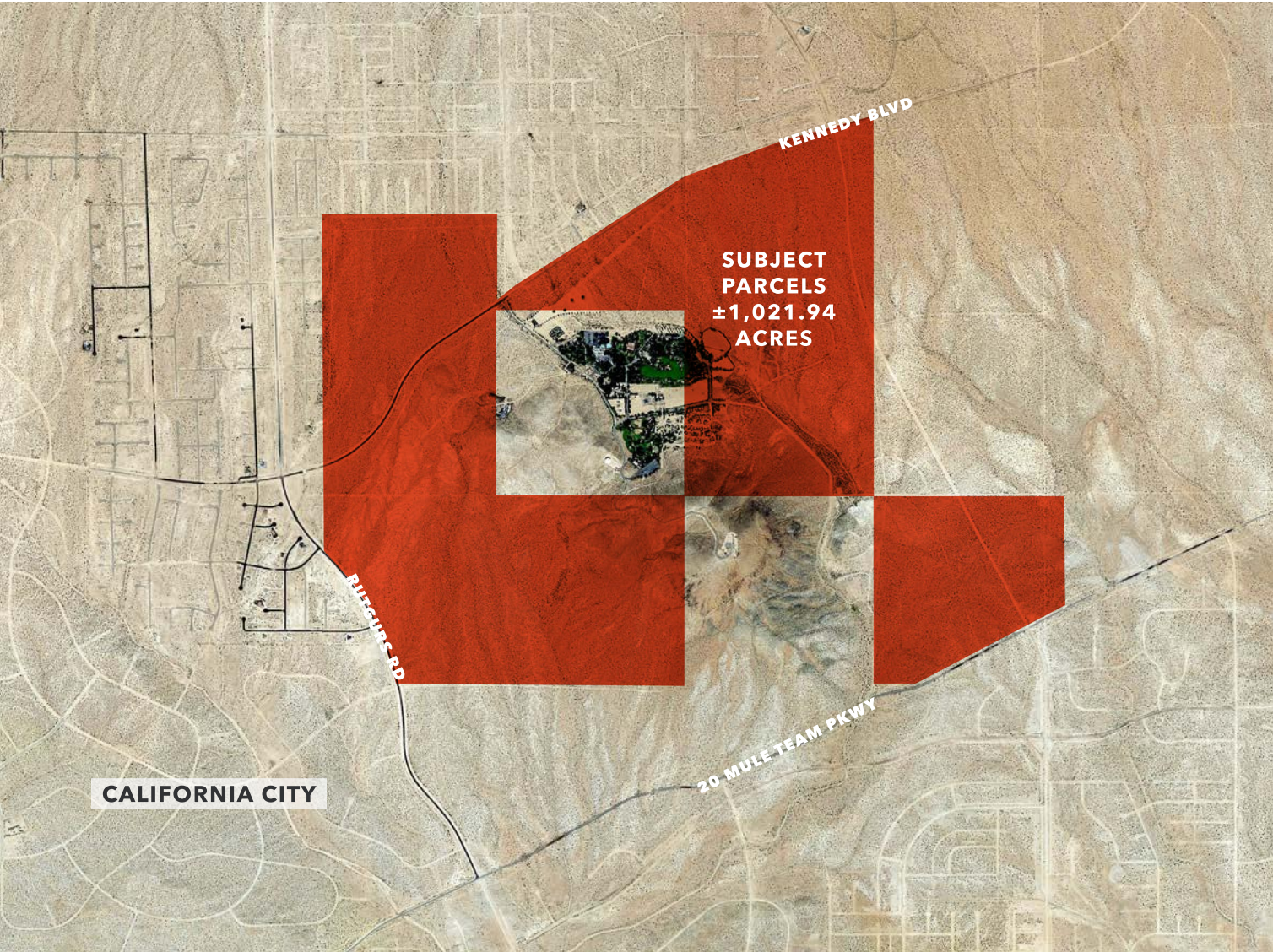
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**FOR SALE**

# Vacant Land, California City

CALIFORNIA



## PROPERTY OVERVIEW

Price	\$919,746.00
Price / Acre	\$900.00 per acre
Size	±1,021.94 AC
Address	California City, CA
APN's	457-020-05, 457-020-13, 457-020-14, 457-020-16, 457-020-25, 457-030-04, 457-030-05, 457-030-10
Electricity	To a small part of the property

The Sale of the Property is subject to approval by the Superior Court of the State of California for the County of San Diego.

**TERESIA KNIGHT**

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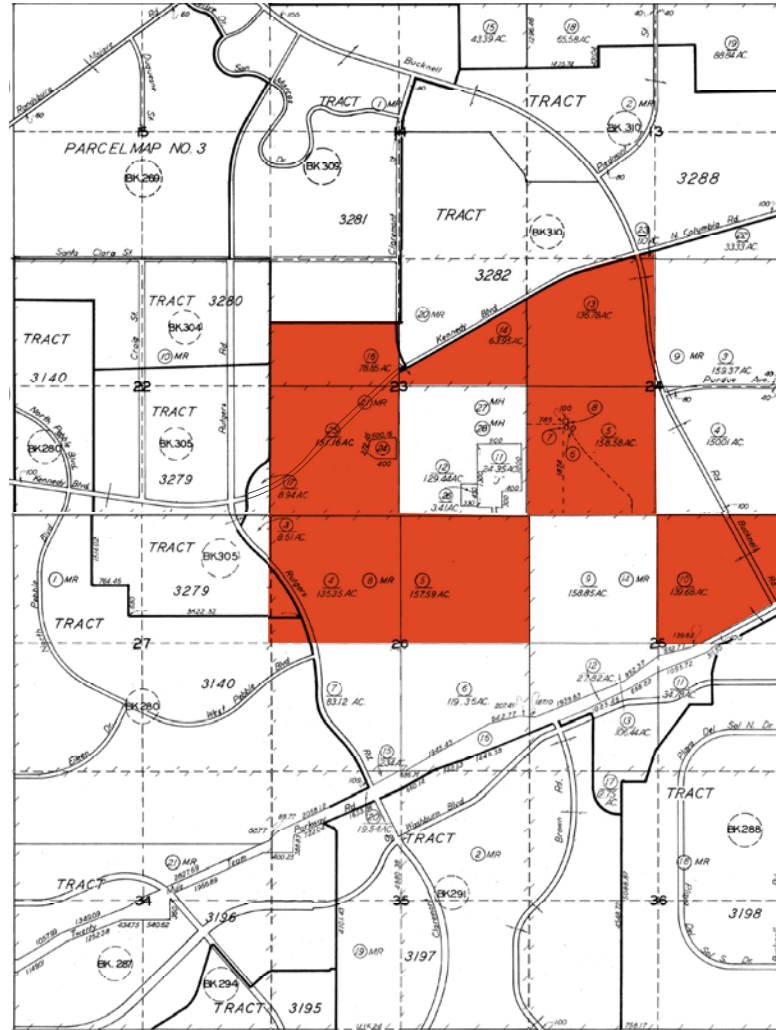
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FOR SALE

# Vacant Land, California City

CALIFORNIA

## Site Map



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FOR SALE

# Vacant Land, California City

CALIFORNIA

## Zoning Map



ZONE KEY	
O/RA	Conservation land
O/RA	Controlled development, Public parks and recreation or public schools
R1	Medium density residential - 6 D.U./1 Acre (sewered) - 2 D.U./1 Acre (Unsewered)
XX	XXXX
XX	XXXX

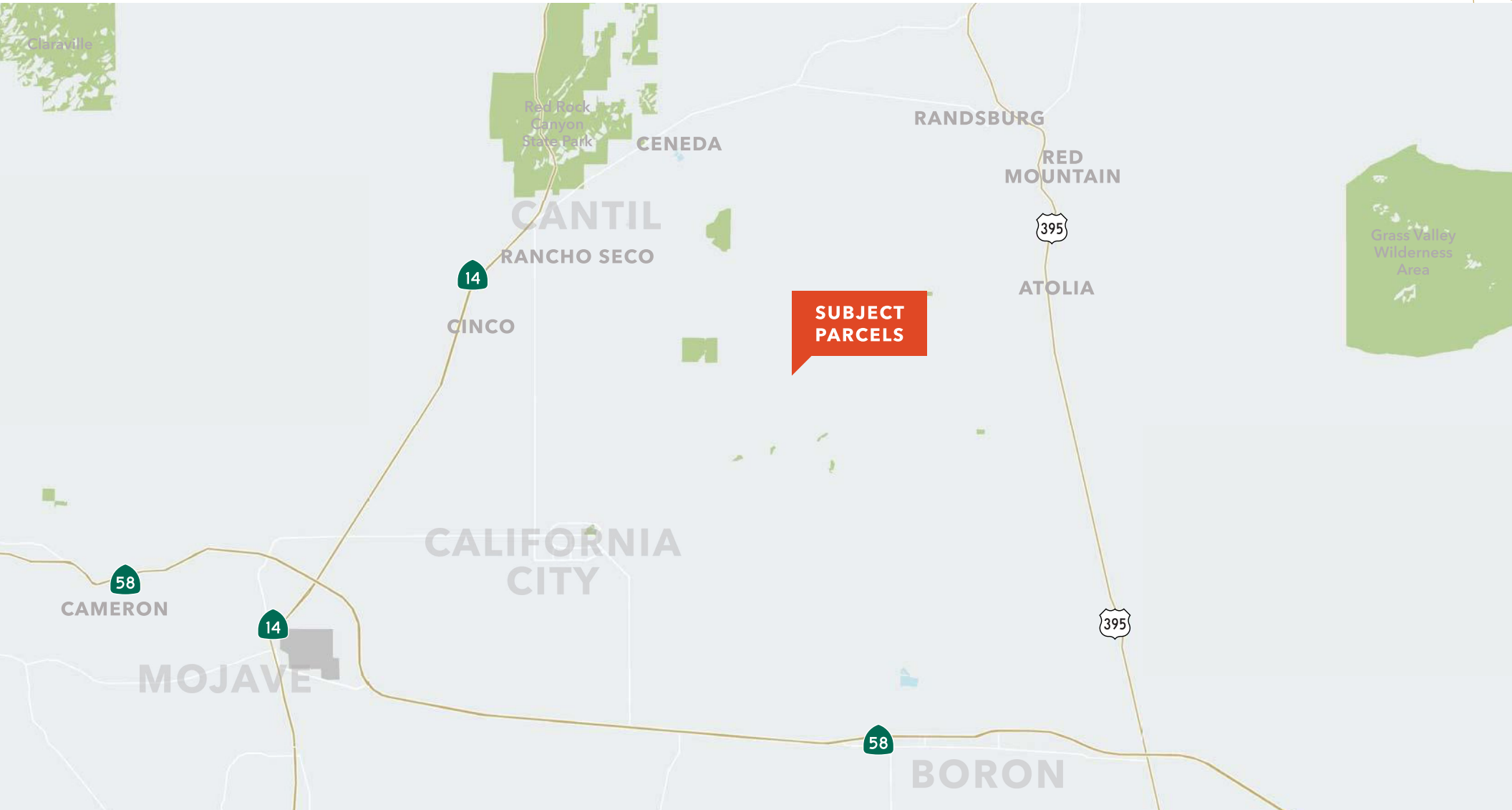
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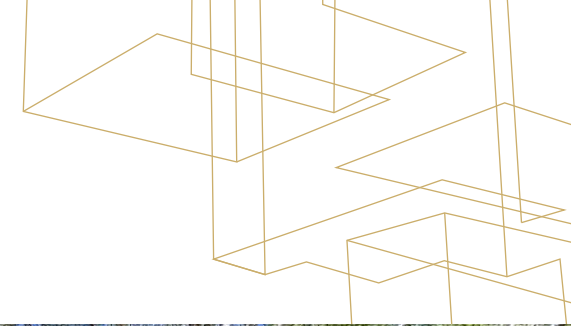
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