

AFFIDAVIT OF TRUTH
SWORN STATEMENT OF TASLEEMA YASIN
SUBMITTED IN SUPPORT OF ALL PENDING PROCEEDINGS

Re: VM Master Issuer, LLC v. Tasleema Yasin — Case No. 23D32729
Georgia Court of Appeals — Case No. A25A1525
United States Supreme Court — Case No. No. 25-6244

I. IDENTITY AND COMPETENCY OF AFFIANT

I, Tasleema Yasin, a living woman of lawful age, hereby appear in my own proper capacity. I have personal, firsthand knowledge of every fact stated in this Affidavit. I am competent to testify to all matters stated herein. I make this Affidavit freely and voluntarily, under penalty of perjury under the laws of the State of Georgia and the United States of America, and declare that every statement herein is true, correct, complete, and not misleading to the best of my knowledge and belief.

II. FACT 1 — I HAVE NEVER HAD A CONTRACT WITH VM MASTER ISSUER, LLC

I, Tasleema Yasin, hereby solemnly affirm and declare under penalty of perjury:

I have never signed, executed, or entered into any lease agreement, rental agreement, or contract of any kind with VM Master Issuer, LLC.

I have never knowingly, intentionally, or voluntarily agreed to any contractual relationship with VM Master Issuer, LLC.

I have never received any document from VM Master Issuer, LLC bearing my signature that constitutes a valid, binding contract.

VM Master Issuer, LLC has never produced — in three years of litigation — any original signed lease, rental agreement, or contract bearing my wet ink signature.

My lease was with ARVM 5, LLC, as recorded in the DeKalb County Superior Court Deed Book 31271, Page 333, on February 1, 2024. This is the only lease I signed in connection with the property located at 1868 Moore Creek Lane, Conley, Georgia 30288.

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:42 PM
FILED
BY: Laura R Rodriguez

III. FACT 2 — I MADE ALL REQUIRED COURT REGISTRY PAYMENTS

I hereby solemnly affirm and declare under penalty of perjury:

On January 18-19, 2024, under protest and duress and under threat of immediate eviction, I paid \$7,410.00 and \$222.30 into the registry of the Magistrate Court of DeKalb County, as ordered by Magistrate Judge Lynn Kleinrock.

I made these payments not as an acknowledgment of any debt to VM Master Issuer, LLC, but solely to prevent my family from being immediately evicted while I pursued my legal rights.

I have court receipts and electronic payment records confirming these payments.

Despite these proven payments, Attorney Elizabeth Cruikshank filed multiple sworn affidavits stating that Plaintiff had not received or accepted any money from me. These statements were false. I know them to be false because I made the payments myself and have the receipts.

IV. FACT 3 — I NEVER FILED FOR BANKRUPTCY

I hereby solemnly affirm and declare under penalty of perjury:

I have never filed for bankruptcy at any time.

I have never retained a bankruptcy attorney.

I have never submitted any bankruptcy petition to any court.

Attorney Elizabeth Cruikshank's sworn affidavit stating that I filed for bankruptcy is a deliberate, knowing falsehood. There is no bankruptcy filing. There never was. This allegation was fabricated to excuse Attorney Cruikshank's untimely filing of a Writ of Possession application.

**V. FACT 4 — JUDGE KLEINROCK ACKNOWLEDGED BIAS AND REFUSED TO
RECUSE**

I hereby solemnly affirm and declare under penalty of perjury:

During proceedings before Magistrate Judge Lynn Kleinrock, I made multiple formal motions for her recusal, citing specific grounds of bias and partiality.

Magistrate Judge Kleinrock acknowledged in her own words, on the record, that her impartiality could reasonably be questioned.

Despite this acknowledgment, Magistrate Judge Kleinrock refused to recuse herself.

During the January 11, 2024 Zoom hearing, my microphone was muted by the court clerk while I was actively attempting to present my defense. Magistrate Judge Kleinrock took no corrective action to ensure I could be heard.

I was denied a meaningful opportunity to present evidence, challenge Plaintiff's claims, or confront witnesses — rights guaranteed to me by the Constitution of the United States and the Constitution of the State of Georgia.

VI. FACT 5 — J. MIKE WILLIAMS HAD NO AUTHORITY IN MY CASE

I hereby solemnly affirm and declare under penalty of perjury:

Attorney J. Mike Williams, Bar No. 765209, was never identified to me as counsel for VM Master Issuer, LLC in Case No. 23D32729.

Attorney J. Mike Williams never filed a notice of appearance in Case No. 23D32729 that was disclosed to me.

Attorney J. Mike Williams filed the Default Order and Judgment motion on January 22, 2024, the same day the default was entered — without any prior notice to me, without any demonstrated authority from VM Master Issuer, LLC, and without proper standing.

The financial figures in the default judgment motioned by Attorney Williams did not match the amounts ordered by Judge Kleinrock, and funds that the judgment's own terms stated should be returned to me were never returned.

VII. FACT 6 — THE E-FILING SYSTEM FAILED AND I ACTED DILIGENTLY

I hereby solemnly affirm and declare under penalty of perjury:

On January 2, 2025, I timely submitted my Notice of Appeal through the mandatory eFileGA system (Envelope No. 16942210), within the 10-day deadline established by the Georgia Court of Appeals' December 23, 2024, order granting discretionary review.

The eFileGA system malfunctioned and misclassified my filing into a fee waiver queue despite my attempted payment, then rejected the filing.

I immediately contacted the Court's clerk. On January 13, 2025, Clerk Ronda Young directed me to amend and resubmit my filing.

I complied immediately, resubmitting it on January 15, 2025 (Envelope No. 17054358).

The system malfunction was not my fault. I took every step available to me to file timely. I followed the clerk's own instructions. The dismissal of my appeal as untimely was caused entirely by a State e-filing system failure, not by any action or inaction on my part.

VIII. FACT 7 — VM MASTER ISSUER SOLD THE PROPERTY

I hereby solemnly affirm and declare under penalty of perjury:

On or about April 2026, I received a written notice from Main Street Renewal informing me that VM Master Issuer, LLC sold the property located at 1868 Moore Creek Lane, Conley, Georgia 30288, and purported to assign the lease to ALTO Asset Company 6, LLC.

I have never signed any contract with ALTO Asset Company 6, LLC.

I have never agreed to any lease or rental obligation with ALTO Asset Company 6, LLC.

My security deposit in the amount of \$2,470 was transferred to ALTO Asset Company 6, LLC without my knowledge, consent, or any court order authorizing such transfer.

This transfer of my property — my security deposit — without my consent constitutes a deprivation of my property without due process of law.

IX. FACT 8 — HARM SUFFERED

I hereby solemnly affirm and declare under penalty of perjury:

As a direct result of the unlawful proceedings described herein, I have suffered:

Three years of unlawful dispossessory proceedings based on a contract that does not exist.

Forced payment of \$7,410.00 and \$222.30 into the court registry under duress and protest.

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:42 PM
FILED
BY: Laura R Rodriguez

Loss of my right to appellate review due to a State e-filing system malfunction.
Deprivation of my \$2,470 security deposit transferred to a third party without my consent.
Severe emotional distress, mental anguish, and hardship to my family.
Expenditure of extraordinary time, resources, and effort defending against a baseless action; and
Deprivation of my constitutional rights to due process, equal protection, and access to courts.

X. DECLARATION UNDER PENALTY OF PERJURY

I, Tasleema T. Yasin, declare under penalty of perjury under the laws of the United States of America and the State of Georgia that the foregoing is true and correct to the best of my knowledge, information, and belief.

This Affidavit is submitted in support of all pending proceedings including but not limited to: DeKalb County Magistrate Court Case No. 23D32729; Georgia Court of Appeals Case No. A25A1525; and United States Supreme Court Case No. 25-6244.

Executed this 10 day of April 2026, in Atlanta, Georgia.



Tasleema Yasin

Affiant

925B Peachtree St. NE 138

Atlanta, Georgia 30309

JURAT — NOTARY ACKNOWLEDGMENT

State of Georgia

County of Fulton

Subscribed and sworn to before me this 10 day of April 2026, by Tasleema Yasin, who is personally known to me or proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Notary Public

My Commission Expires: 3-25-2029

(Notary Seal)



Exhibit A

Main Street Renewal
3903 S Congress Ave #40298,
Austin, TX, 78704



1oz - #10 - Q14670 - 138 - 138 - F1 P281 - 00074
TASLEEMA YASIN
1868 MOORE CREEK LN
CONLEY, GA 30021



1oz - #10 - Q14670
138 - 138 - F1 P281

Notice

Dear Resident,

This notice is to inform you that VM Master Issuer, LLC has sold the property located at 1868 Moore Creek Ln (the "Property") and assigned your lease (the "Lease") to ALTO Asset Company 6, LLC. As such, ALTO Asset Company 6, LLC is now the owner of the Property (the "Owner"). The Owner's name and address for purposes of your Lease is: ALTO Asset Company 6, LLC in care of Main Street Renewal LLC, 3903 S Congress Ave #40298, Austin, TX, 78704.

Main Street Renewal will continue to be your property management company. You will still make your rent payments through our **24/7 online Resident Portal** at <http://www.msrenewal.com/residentportal>.

As a result of the sale, the prior owner transferred your security deposit to the new owner who is now in possession of and responsible for your security deposit in the amount of \$2470. The security deposit is in an account at Bank of America and will remain deposited in the account until termination of the existing Lease.

We are committed to providing you with a great resident experience. If you need any assistance or have any questions, please contact us at through the Resident Portal or by calling us at (855) 239-4530.

Sincerely,

Main Street Renewal

Local Leasing Office
808 Park North Blvd Suites 100 & 102
Clarkston GA 30021
(404) 418-5108 - Select Option 2
www.msrenewal.com



Main Street Renewal is committed to comply with all federal, state, and local fair housing laws. It is our policy to ensure we comply with all laws prohibiting discrimination, including those that discriminate against race, color, religion, sex, disability, familial status, national origin, or sexual orientation.

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
04/10/2026 2:39 PM
FILED
BY: Nykesha Rasool

Exhibit B

IN THE COURT OF APPEALS OF THE STATE OF GEORGIA

Case No. A25A1525

VM MASTER ISSUER, LLC,
Plaintiff,

v.

TASLEEMA YASIN,
Defendant.

**EMERGENCY MOTION TO STAY ALL ENFORCEMENT AND MOTION TO
DISMISS WITH PREJUDICE PENDING U.S. SUPREME COURT ACTION**

EMERGENCY RELIEF REQUESTED

This is an emergency motion. The United States Supreme Court will conference this case on April 17, 2026 — eight days from the date of this filing. Appellant seeks: (1) an immediate stay of all enforcement of any writ of possession; and (2) dismissal with prejudice of the underlying action, permanently barring Plaintiff and all successor entities from further proceedings against Appellant.

EXHIBITS

LIST OF EXHIBITS

Exhibit A: Main Street Renewal Notice — Property Sale to ALTO Asset Company 6, LLC (April 2026)

Exhibit B: United States Supreme Court Docket — Case No. No. 25-6244, Conference April 17, 2026

Exhibit C: Motion to Vacate and Dismiss with Prejudice — DeKalb Magistrate Court, Case No. 23D32729

THE FOUR-FACTOR STAY STANDARD IS MET

Factor 1 — Likelihood of Success: STRONG. The Supreme Court is conferencing this case April 17, 2026. The underlying judgment is void for lack of standing, obtained through fraud, and issued by a judge who refused to recuse despite acknowledged bias.

(See Exhibit B — Supreme Court Docket.)

Factor 2 — Irreparable Harm: EXTREME. Enforcement would evict Appellant and her family from their home. This harm cannot be undone by money.

Factor 3 — Harm to Plaintiff: ZERO. VM Master Issuer sold the property. It has no remaining interest. It suffers no cognizable harm from a stay.

(See Exhibit A — Main Street Renewal Notice.)

Factor 4 — Public Interest: STRONGLY FAVORS STAY. The constitutional questions pending before the Supreme Court — whether states may deny appellate rights due to e-filing system failures — affect millions of litigants nationwide.

GROUND FOR DISMISSAL WITH PREJUDICE

In addition to the stay, Appellant moves for dismissal with prejudice on grounds fully briefed in the accompanying Motion for Reconsideration (Document 7). In summary:

1. VM Master Issuer lacked standing from inception — permanent, incurable defect.
2. The case is permanently moot — Plaintiff sold the property.
3. The judgment was obtained through pervasive fraud upon the court.
4. All proceedings were before a judge who refused to recuse despite acknowledged bias.
5. Dismissal with prejudice with res judicata effect is the only remedy that prevents ALTO Asset Company 6, LLC or any future assignee from relitigating these same void claims.

RELIEF REQUESTED — EMERGENCY ORDER

1. **IMMEDIATE STAY** — Staying all enforcement of any writ of possession in Case No. 23D32729 pending Supreme Court action in Case No. 25-6244.
2. **CEASE AND DESIST** — Ordering all marshals and enforcement officers to immediately cease any enforcement action against Appellant.

3. DISMISS WITH PREJUDICE — Dismissing the underlying action with prejudice, permanently, binding VM Master Issuer, ALTO Asset Company 6, LLC, Main Street Renewal, and all successors.

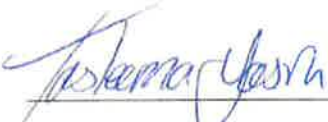
4. RES JUDICATA — Declaring the dismissal operates as res judicata barring all future related claims.

5. VOID JUDGMENT — Declaring the January 22, 2024, default judgment void ab initio.

6. RETURN — Ordering return of all court registry payments and the \$2,470 security deposit; and

7. EXPEDITED — Setting this motion for immediate consideration given the April 17, 2026, Supreme Court conference.

Respectfully submitted,



Tasleema T. Yasin

Pro Se

925B Peachtree St. NE 138

Atlanta, Georgia 30309

TasleemaYasinLLC@gmail.com

April 9, 2026

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following parties via certified mail, return receipt requested, on April 9, 2026:

1. Attorney Elizabeth Cruikshank, 6065 Roswell Rd NE #680, Atlanta, GA 30328 —
beth@cruikshankersin.com

Certified Mail # 9589 0710 5270 3569 0057 97

2. Attorney J. Mike Williams, 2970 Clairmont Rd #220, Atlanta, GA 30329

Certified Mail # 9589 0710 5270 3569 0058 ¹⁰~~97~~

3. Magistrate Court of DeKalb County — 556 North McDonough Street, Decatur, Georgia 30030 (Courtesy Copy)



Tasleema T. Yasin

Exhibit C

IN THE MAGISTRATE COURT OF DEKALB COUNTY STATE OF GEORGIA

Case No. 23D32729

VM MASTER ISSUER, LLC,
Plaintiff,

v.

TASLEEMA YASIN,
Defendant.

**MOTION TO VACATE VOID JUDGMENT, SUGGESTION OF MOOTNESS, AND
MOTION TO DISMISS WITH PREJUDICE**

INTRODUCTION

Defendant TASLEEMA YASIN respectfully moves this Court pursuant to O.C.G.A. § 9-11-60(d) to vacate the default judgment entered in this matter and to dismiss this action with prejudice, permanently and irrevocably, on the following grounds, each of which is independently sufficient:

Ground 1: Plaintiff VM Master Issuer, LLC has sold the subject property to ALTO Asset Company 6, LLC, rendering this action permanently moot and confirming that Plaintiff never had a valid legal interest sufficient to sustain this action.

Ground 2: Plaintiff never had a valid contract with Defendant. Defendant's lease was with ARVM 5, LLC. Without a contract, Plaintiff lacked standing from day one and this Court lacked subject matter jurisdiction.

Ground 3: The default judgment was obtained through fraud upon the court, including false affidavits and an unauthorized default motion.

Ground 4: All proceedings were conducted before Magistrate Judge Lynn Kleinrock, who refused to recuse despite acknowledging her impartiality could reasonably be questioned.

Ground 5: This case is currently pending before the United States Supreme Court as Case No. No. 25-6244, distributed for Conference of April 17, 2026.

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 2:39 PM
FILED
BY: Nykesha Rasool

Dismissal with prejudice is essential. Without it, Plaintiff — or its assignee ALTO Asset Company 6, LLC — will simply re-file the same baseless action. Three years of litigation built on a nonexistent contract must end permanently.

EXHIBITS INCORPORATED HEREIN

The following exhibits are attached and incorporated into this Motion by reference:

LIST OF EXHIBITS

Exhibit A: Main Street Renewal Notice — VM Master Issuer sold property to ALTO Asset Company 6, LLC (April 2026)

Exhibit B: Georgia Court of Appeals Filing — Motion to Dismiss with Prejudice, Case No. A25A1525

Exhibit C: United States Supreme Court Docket — Case No. No. 25-6244, Distributed for Conference April 17, 2026

Exhibit D: Court Receipts — Payment of \$7,410.00 and \$222.30 into Court Registry, January 19, 2024

Exhibit E: Original Lease — ARVM 5, LLC and Tasleema Yasin, DeKalb County Deed Book 31271, Page 333

STATEMENT OF FACTS

1. On November 22, 2023, Plaintiff VM Master Issuer, LLC — a foreign limited liability company incorporated in Delaware — initiated dispossessory proceedings against Defendant at the property located at 1868 Moore Creek Lane, Conley, Georgia 30288.

2. Defendant has never signed a lease, rental agreement, or any contract with VM Master Issuer, LLC. Defendant's lease was with ARVM 5, LLC, as recorded in DeKalb County Superior Court Deed Book 31271, Page 333, on February 1, 2024.

(See Exhibit E — Original Lease — ARVM 5, LLC.)

3. On January 11, 2024, Magistrate Judge Lynn Kleinrock ordered Defendant to pay \$7,410.00 into the court registry by January 18, 2024. Defendant paid \$7,410.00 and \$222.30 into the court registry on January 19, 2024.

(See Exhibit D — Court Payment Receipts.)

4. On January 22, 2024, a default judgment was entered at the motion of Attorney J. Mike Williams — a complete stranger to the case with no standing, no notice of appearance, and no delegation of authority from Plaintiff.

5. Attorney Elizabeth Cruikshank filed multiple Applications for Writ of Possession containing affidavits falsely stating that Plaintiff had not received or accepted any money from Defendant — despite Defendant's proven payment into the court registry.

6. Magistrate Judge Lynn Kleinrock acknowledged that her impartiality could reasonably be questioned but refused to recuse herself, in direct violation of O.C.G.A. § 15-1-8 and Canon 3E of the Code of Judicial Conduct.

7. On April 21, 2025, the Georgia Court of Appeals dismissed Defendant's appeal as untimely due to a malfunction in the State's mandatory eFileGA system — not due to any failure by Defendant.

(See Exhibit B — Georgia Court of Appeals Filing.)

8. On September 18, 2025, Defendant filed a Petition for Writ of Certiorari in the United States Supreme Court. The case is docketed as No. No. 25-6244 and is distributed for Conference of April 17, 2026.

(See Exhibit C — United States Supreme Court Docket.)

9. On or about April 2026, Defendant received written notice that VM Master Issuer, LLC sold and transferred the subject property to ALTO Asset Company 6, LLC. Defendant's \$2,470 security deposit was transferred without her knowledge or consent.

(See Exhibit A — Main Street Renewal Notice of Sale.)

ARGUMENT

I. THE JUDGMENT IS VOID AND MUST BE VACATED — O.C.G.A. § 9-11-60(d)

A void judgment is one rendered by a court lacking jurisdiction over the subject matter or parties. It is a legal nullity that may be challenged at any time and must be vacated. *Pennoyer v. Neff*, 95 U.S. 714 (1877). Jurisdiction is not a formality — it is the bedrock of judicial authority.

Here, this Court lacked jurisdiction from the inception because Plaintiff lacked standing. Plaintiff never produced — and cannot produce — a contract with Defendant establishing a landlord-tenant relationship. Without standing, there is no case or controversy for the Court to adjudicate. Every order, ruling, and judgment in this case is therefore void ab initio.

II. DISMISSAL WITH PREJUDICE IS REQUIRED — FIVE INDEPENDENT GROUNDS

A. Permanent Lack of Standing — The Defect Is Incurable

VM Master Issuer never had a contract with Defendant. This is not a curable defect. Plaintiff cannot retroactively create a contractual relationship. Dismissal with prejudice is the appropriate remedy when a plaintiff's lack of standing is permanent and incurable, because dismissal without prejudice would simply permit Plaintiff — or its assignee ALTO — to re-file the same baseless action. *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992).

B. Permanent Mootness — Plaintiff Has No Remaining Interest

Plaintiff has sold the property. It has no remaining ownership, possessory, or financial interest. A plaintiff that voluntarily divests itself of all interest in the subject matter of litigation cannot continue to prosecute that litigation — and the resulting mootness warrants dismissal with prejudice, not without prejudice, to prevent Plaintiff from reassigning its claims and re-initiating proceedings through a successor. *Friends of the Earth v. Laidlaw Environmental Services*, 528 U.S. 167 (2000).

C. Fraud Upon the Court — Dismissal as Sanction

Courts have inherent authority to dismiss actions with prejudice as a sanction for fraud upon the court. *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944); O.C.G.A. § 9-11-60(d)(2). The fraud here includes:

False affidavits: Attorney Cruikshank swore in multiple affidavits that Plaintiff had received no money from Defendant. This was false. Defendant paid \$7,410.00 and \$222.30 into the court registry on January 19, 2024, as proven by court receipts.

(See Exhibit D — Court Payment Receipts.)

Fabricated bankruptcy allegation: Attorney Cruikshank falsely stated in a sworn affidavit that Defendant had filed for bankruptcy. No bankruptcy was filed. This fabrication was used to excuse Cruikshank's untimely writ application.

Unauthorized default motion: Attorney J. Mike Williams, a complete stranger to the case with no standing, obtained the default judgment. A judgment obtained by an unauthorized party is void.

False address: Attorney Cruikshank listed her own firm's address as Plaintiff's address, concealing that Plaintiff is a Delaware foreign entity based in Austin, Texas, which was material to jurisdiction.

D. Biased Tribunal — All Proceedings Constitutionally Void

Magistrate Judge Kleinrock acknowledged her impartiality could reasonably be questioned but refused to recuse herself. The standard under Canon 3E and O.C.G.A. § 15-1-8 is objective — when a judge acknowledges that reasonable people could question her impartiality, recusal is

mandatory. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009). Every order she issued in this case is constitutionally tainted and void.

E. Unclean Hands Bar Any Relief to Plaintiff

The doctrine of unclean hands bars a party who has engaged in inequitable conduct from obtaining equitable relief. *Keystone Driller Co. v. General Excavator Co.*, 290 U.S. 240 (1933). Plaintiff initiated this action without a contract, its attorneys filed false affidavits, fabricated evidence, and obtained judgment through an unauthorized party. Plaintiff is not entitled to any equitable relief, including a writ of possession.

III. RES JUDICATA EFFECT OF DISMISSAL WITH PREJUDICE

A dismissal with prejudice operates as a final judgment on the merits and triggers res judicata, barring relitigation of the same claims between the same parties and their privies. *Young v. City of Augusta*, 59 F.3d 1160 (11th Cir. 1995). This res judicata effect would bind:

VM Master Issuer, LLC — the original Plaintiff;

ALTO Asset Company 6, LLC — as assignee and successor in interest to VM Master Issuer;

Main Street Renewal LLC — as agent acting on behalf of both entities; and

Any future entity to whom any interest is further assigned or transferred.

Without dismissal with prejudice, Plaintiff could assign its purported claim to yet another entity — and the cycle of baseless litigation would continue indefinitely. **Dismissal with prejudice is the only remedy that permanently protects Defendant.**

IV. THIS COURT SHOULD STAY ENFORCEMENT PENDING SUPREME COURT ACTION

This case is before the United States Supreme Court as Case No. No. 25-6244, distributed for Conference of April 17, 2026. Any enforcement of a writ of possession before the Supreme Court acts would render the Court's review meaningless. This Court has authority and obligation to stay enforcement to preserve the Supreme Court's ability to provide effective relief.

(See Exhibit C — United States Supreme Court Docket.)

RELIEF REQUESTED

Defendant Tasleema Yasin respectfully requests this Court enter an order:

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 2:39 PM
FILED
BY: Nykesha Rasool

1. **VACATE** — Vacating the default judgment of January 22, 2024, as void ab initio and of no legal force or effect.
2. **DISMISS WITH PREJUDICE** — Dismissing Case No. 23D32729 — VM Master Issuer, LLC v. Tasleema Yasin — WITH PREJUDICE, permanently and irrevocably, binding VM Master Issuer, LLC, ALTO Asset Company 6, LLC, Main Street Renewal LLC, and all successors and assigns.
3. **RES JUDICATA** — Declaring that this dismissal with prejudice operates as res judicata barring any future action by any party arising from or related to the property or purported lease.
4. **STAY** — Staying all enforcement pending Supreme Court action in Case No. No. 25-6244.
5. **CEASE AND DESIST** — Ordering all marshals and enforcement officers to immediately cease any enforcement action against Defendant.
6. **RETURN OF FUNDS** — Ordering return of all funds paid by Defendant into the court registry.
7. **RETURN OF DEPOSIT** — Ordering return of Defendant's \$2,470 security deposit.
8. **REFERRAL** — Referring Attorney Elizabeth Cruikshank (Bar No. 215235) and Attorney J. Mike Williams (Bar No. 765209) to the State Bar of Georgia for investigation.
9. **SANCTIONS** — Imposing appropriate sanctions against Plaintiff and its attorneys for fraud upon the court; and
10. **FURTHER RELIEF** — Granting such other relief as this Court deems just and proper.

Respectfully submitted,



Tasleema Yasin

Pro Se

925B Peachtree St. NE 138

Atlanta, Georgia 30309

TasleemaYasinLLC@gmail.com

April 9, 2026

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following parties via certified mail, return receipt requested, on April 9, 2026:

1. Attorney Elizabeth Cruikshank, 6065 Roswell Rd NE #680, Atlanta, GA 30328
Certified Mail # 9589 0710 5270 3569 0057 97
2. Attorney J. Mike Williams, 2970 Clairmont Rd #220, Atlanta, GA 30329
Certified Mail # 9589 0710 5270 3569 0057 97



Tasleema T. Yasin

Exhibit D

Tasleema T. Yasin

925B Peachtree St. NE 138

Atlanta, Georgia 30309

TasleemaYasinLLC@gmail.com

April 9, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

AND ELECTRONIC MAIL — beth@cruikshankersin.com

Certified mail # 9589 0710 5270 3569 0057 97

Attorney Elizabeth Cruikshank

Georgia Bar No. 215235

Cruikshank Ersin LLC

6065 Roswell Road, Suite 680

Atlanta, Georgia 30328

**FORMAL LEGAL NOTICE OF PROFESSIONAL OBLIGATIONS,
DEMAND TO WITHDRAW, DISMISS WITH PREJUDICE,
AND NOTICE OF CONSEQUENCES FOR NON-COMPLIANCE**

**RE: VM MASTER ISSUER, LLC v. TASLEEMA YASIN — CASE NO. 23D32729
U.S. SUPREME COURT CASE NO. No. 25-6244 — CONFERENCE APRIL 17, 2026**

I. PURPOSE OF THIS LETTER

This letter serves as formal legal notice to you, Elizabeth Cruikshank, Georgia Bar No. 215235, of your mandatory professional and ethical obligations as an officer of the court, your criminal exposure arising from your conduct in Case No. 23D32729, and a formal demand that you immediately withdraw from this matter and file a motion to dismiss the underlying action with prejudice.

This is not a request. Your duties as a member of the Georgia Bar are not optional. The laws and rules cited herein impose mandatory obligations. Your failure to comply will result in formal grievance complaints, criminal referrals, and notification to every relevant authority.

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez

II. BACKGROUND — WHAT YOU DID

The record in Case No. 23D32729 establishes the following, which you know to be true:

- 1. No Contract Exists.** Your client VM Master Issuer LLC has no contract with Tasleema Yasin. The lease was between ARVM 5, LLC and Tasleema Yasin, recorded in DeKalb County Deed Book 31271, Page 333. You proceeded with three years of litigation knowing this.
- 2. You Filed False Affidavits.** You filed multiple Applications for Writ of Possession containing affidavits in which you falsely stated that Plaintiff had not received or accepted any money from Defendant. This was false. Defendant paid \$7,410.00 and \$222.30 into the court registry on January 19, 2024. You had access to court records. You knew or should have known these payments had been made. You filed these affidavits anyway.
- 3. You Fabricated a Bankruptcy Allegation.** In your Affidavit as to Re-Issuance of Writ of Possession, you falsely stated that Defendant had filed for bankruptcy. No bankruptcy was filed. You fabricated this allegation to excuse your untimely filing. This is perjury in an affidavit before a court of law.
- 4. You Filed Unsworn Affidavits.** None of your affidavits in support of Writ applications were properly sworn under penalty of perjury by a firsthand witness with personal knowledge of the facts. You filed affidavits as if you personally were a witness placing yourself in the impermissible dual role of advocate and witness.
- 5. You Misrepresented Plaintiff's Address.** You listed your own firm's address — 6065 Roswell Road, Suite 680, Atlanta, Georgia 30328 — as Plaintiff's address in court filings, when Plaintiff VM Master Issuer, LLC's actual address is in Austin, Texas. This misrepresentation concealed Plaintiff's status as a Delaware foreign entity and created a false impression of Georgia jurisdiction.
- 6. You Misspelled Defendant's Name.** You repeatedly misspelled Defendant's name — as 'TASLEEMS YASIN' and 'TASEEEMS YASIN' despite having been notified that the name TASLEEMA YASIN is trademarked. This unauthorized use of Defendant's trademarked name constitutes trademark infringement.
- 7. Your Client Has Now Sold the Property.** VM Master Issuer LLC has sold the subject property to ALTO Asset Company 6, LLC. Your client has no remaining interest in this litigation. Defendant's \$2,470 security deposit was transferred without her knowledge or consent.

8. This Case Is Before the United States Supreme Court. Case No. No. 25-6244, Tasleema Yasin v. VM Master Issuer, LLC, is distributed for Conference of April 17, 2026 — eight days from the date of this letter.

III. YOUR MANDATORY PROFESSIONAL OBLIGATIONS

A. Georgia Rules of Professional Conduct — Mandatory, Not Discretionary

Rule 3.3 — Candor Toward the Tribunal (MANDATORY):

Rule 3.3(a)(1) provides that a lawyer shall not knowingly make a false statement of fact or law to a tribunal. Rule 3.3(a)(3) provides that a lawyer shall not offer evidence the lawyer knows to be false. You filed affidavits falsely stating no money had been received from Defendant. You knew these statements were false or recklessly disregarded their falsity. This is a direct, serious violation of Rule 3.3. Violation of Rule 3.3 can result in disbarment.

Rule 3.4 — Fairness to Opposing Party and Counsel (MANDATORY):

Rule 3.4(b) prohibits a lawyer from falsifying evidence, counseling or assisting a witness to testify falsely, or offering an inducement to a witness. Your false affidavits constitute falsified evidence offered to the tribunal. This is a violation of Rule 3.4.

Rule 3.7 — Lawyer as Witness (MANDATORY):

Rule 3.7 prohibits a lawyer from acting as an advocate in a proceeding in which the lawyer is likely to be a necessary witness. By filing your own affidavits as if you were a firsthand witness to the facts of this case, you placed yourself in the prohibited dual role of advocate and witness. You should have withdrawn from representation at that point. You did not.

Rule 8.4 — Misconduct (MANDATORY):

Rule 8.4(a)(1) prohibits conduct involving dishonesty, fraud, deceit, or misrepresentation. Rule 8.4(a)(4) prohibits conduct that is prejudicial to the administration of justice. Your false affidavits, fabricated bankruptcy allegation, address misrepresentation, and prosecution of an action on behalf of a client with no contract with the opposing party constitute violations of Rule 8.4 in the most serious degree.

Rule 1.16 — Declining or Terminating Representation (MANDATORY):

Rule 1.16(a)(1) requires a lawyer to withdraw from representation when continued representation will result in violation of the Rules of Professional Conduct. Your continued prosecution of this case — when your client has no contract with Defendant, has sold the property, and when continuation requires maintaining false representations before multiple courts — requires mandatory withdrawal under Rule 1.16. You have a duty to withdraw now.

Rule 1.2(d) — Prohibited Assistance (MANDATORY):

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez

Rule 1.2(d) prohibits a lawyer from assisting a client in conduct the lawyer knows to be fraudulent. Continuing to represent VM Master Issuer in this action — after knowing your client has no contract with Defendant, after knowing your affidavits were false, and after knowing your client has sold the property — constitutes assisting in fraudulent conduct.

B. ABA Model Rules — Your Duties as an Officer of the Court

As a member of the Georgia Bar, you are an officer of the court. This status imposes duties to the court and to the justice system that supersede your duties to your client. ABA Model Rule 3.3, Comment [2] states: 'The lawyer's duty to the court is paramount.' When your duties to your client conflict with your duties to the court — as they do here — your duty to the court prevails.

ABA Model Rule 3.3(b) imposes an affirmative duty: if a lawyer has offered material evidence and later comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. You have now had ample time to recognize that your affidavits were false. Your duty under Rule 3.3(b) requires you to disclose this to the court — not simply remain silent and hope it goes away.

C. Your Duty to Update the Court

As an attorney who has made representations to the court that you now know to be false or misleading, you have an affirmative, non-delegable duty to correct the record. This duty exists regardless of whether it is convenient for your client. Specifically:

You must notify the court that your affidavits stating no money was received were false, and that Defendant paid \$7,410.00 and \$222.30 into the court registry on January 19, 2024.

You must notify the court that your affidavit stating Defendant filed for bankruptcy was false — no bankruptcy was filed.

You must notify the court that VM Master Issuer, LLC has sold the subject property and no longer has any interest in this litigation; and

You must file a motion to dismiss the underlying action with prejudice, given that your client has no contract with Defendant, no remaining interest in the property, and obtained its judgment through fraud.

IV. YOUR CRIMINAL EXPOSURE

THIS IS NOT MERELY AN ETHICAL MATTER. YOUR CONDUCT IMPLICATES CRIMINAL STATUTES.

18 U.S.C. § 1001 — False Statements:

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez

This statute prohibits knowingly and willfully making any materially false statement in any matter within the jurisdiction of a federal court or federal agency. Your false affidavits were filed in proceedings that were ultimately appealed to the United States Supreme Court — a federal matter. False statements made in connection with federal proceedings may constitute violations of 18 U.S.C. § 1001, punishable by up to five years imprisonment.

18 U.S.C. § 1621 — Perjury:

Perjury consists of knowingly making a false statement under oath in any proceeding before a court of the United States or a proceeding ancillary thereto. Your affidavits were sworn before a notary and filed in proceedings now before the United States Supreme Court. Knowingly false sworn statements in these proceedings constitute perjury under federal law, punishable by up to five years imprisonment.

18 U.S.C. § 1341 — Mail Fraud:

Mail fraud consists of using the United States mail in furtherance of a scheme to defraud. Your false affidavits and fraudulent writ applications were sent through the mail and filed with courts in furtherance of obtaining a writ of possession through fraudulent means. This constitutes mail fraud, punishable by up to 20 years imprisonment.

O.C.G.A. § 16-10-71 — Perjury (Georgia):

Georgia law prohibits making a false sworn statement in any official proceeding. Your false affidavits were sworn before a notary and filed in official judicial proceedings. This constitutes perjury under Georgia law, punishable by imprisonment of one to ten years.

O.C.G.A. § 16-10-20 — False Statements to Courts (Georgia):

Georgia law prohibits knowingly making false statements to any court. Your false representations regarding payment status and the fabricated bankruptcy allegation constitute violations of this statute.

18 U.S.C. § 1962 — RICO:

The Racketeer Influenced and Corrupt Organizations Act prohibits a pattern of racketeering activity. The sustained pattern of fraudulent filings, false affidavits, fabricated allegations, and unauthorized court motions over three years of litigation — all in furtherance of obtaining a writ of possession to which your client had no legal entitlement — constitutes a pattern of racketeering activity under RICO.

V. NOTICE OF PENDING SUPREME COURT PROCEEDINGS

This matter is before the United States Supreme Court as Case No. No. 25-6244, distributed for Conference of April 17, 2026 — eight days from the date of this letter. The nine Justices of the

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez

Supreme Court will vote on whether to grant certiorari. The questions presented include whether Georgia's categorical denial of appellate rights due to e-filing system malfunctions violates the Due Process and Equal Protection Clauses of the Fourteenth Amendment.

Your conduct — including your filing of a sanctions motion in direct response to Defendant's constitutional objections — is part of the record before the Supreme Court. The Supreme Court's review of this case, combined with the exposure of your conduct through these proceedings, creates serious consequences for your career and freedom if you do not act immediately to correct the record.

VI. FORMAL DEMANDS — RESPOND WITHIN 10 DAYS

You are hereby formally demanded to take the following actions within ten (10) days of receipt of this letter:

DEMAND 1: WITHDRAW. File a notice of withdrawal from representation of VM Master Issuer, LLC in Case No. 23D32729 immediately.

DEMAND 2: CORRECT THE RECORD. File a notice with every court where you have appeared — the DeKalb Magistrate Court, the Georgia Court of Appeals, and the Georgia Supreme Court — correcting your false representations regarding Defendant's payment status, the bankruptcy allegation, and VM Master Issuer's loss of any property interest.

DEMAND 3: MOVE TO DISMISS WITH PREJUDICE. File a motion to dismiss Case No. 23D32729 with prejudice in the DeKalb Magistrate Court, acknowledging that: (a) VM Master Issuer had no contract with Defendant; (b) VM Master Issuer has sold the property and has no remaining interest; and (c) the judgment was obtained through fraud. The dismissal must be with prejudice, binding VM Master Issuer, ALTO Asset Company 6, LLC, Main Street Renewal, and all successors and assigns.

DEMAND 4: RETURN SECURITY DEPOSIT. Notify VM Master Issuer and ALTO Asset Company 6, LLC of their obligation to return Defendant's \$2,470 security deposit immediately.

DEMAND 5: CONFIRM IN WRITING. Provide written confirmation within 10 days that you have complied with all of the above demands.

VII. CONSEQUENCES OF NON-COMPLIANCE

If you do not comply with every demand set forth above within ten (10) days, the following actions will be taken immediately and without further notice:

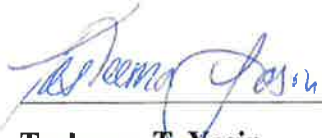
MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez

1. A formal grievance complaint will be filed with the State Bar of Georgia Office of the General Counsel, 104 Marietta Street NW, Suite 100, Atlanta, Georgia 30303, detailing every violation described in this letter.
2. A formal complaint will be filed with the Georgia Judicial Qualifications Commission regarding the conduct of Magistrate Judge Lynn Kleinrock and the broader pattern of judicial misconduct in this matter.
3. Criminal referrals will be made to the United States Department of Justice, the United States Attorney for the Northern District of Georgia, and the Georgia Attorney General regarding potential violations of 18 U.S.C. §§ 1001, 1621, 1341, and 1962, and O.C.G.A. §§ 16-10-71 and 16-10-20.
4. A supplemental brief will be filed with the United States Supreme Court in Case No. 25-6244 detailing your conduct, your failure to comply with your professional obligations, and your role in the constitutional violations that are the subject of that Petition.
5. A civil action will be filed against you personally for fraud, malicious prosecution, abuse of process, and violation of 42 U.S.C. § 1983; and
6. Complaints will be filed with the Consumer Financial Protection Bureau and the Georgia Attorney General's Consumer Protection Division regarding the fraudulent collection efforts conducted on behalf of VM Master Issuer, LLC.

VIII. RESERVATION OF RIGHTS

All rights are reserved without prejudice and without recourse. Nothing in this letter shall be construed as a waiver of any right, claim, or defense. This letter is provided for informational and demand purposes only and does not constitute legal advice.

This is your only notice. Act accordingly.



Tasleema T. Yasin

925B Peachtree St. NE 138

Atlanta, Georgia 30309

TasleemaYasinLLC@gmail.com

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez

April 9, 2026

CC:

State Bar of Georgia Office of the General Counsel
Georgia Judicial Qualifications Commission
United States District Court, Northern District of Georgia
United States Supreme Court — Case No. No. 25-6244
Attorney J. Mike Williams (Bar No. 765209)

MAGISTRATE COURT OF
DEKALB COUNTY, GA.
4/10/2026 3:47 PM
FILED
BY: Laura R Rodriguez