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**LAW OFFICES OF
RONALD RICHARDS & ASSOCIATES, A.P.C.**
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Attorneys for Plaintiff 924 Bel Air Road, LLC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

924 BEL AIR ROAD, LLC a California
Limited Liability Company,

Plaintiffs,

vs.

ZILLOW GROUP, INC., a Washington
Corporation; and ZILLOW, INC., a
Washington Corporation; and DOES 1
through 10, inclusive

Defendants.

CASE NO.

COMPLAINT FOR DAMAGES:

1. Negligence

DEMAND FOR JURY TRIAL

COME NOW Plaintiff 924 BEL AIR ROAD, LLC, ("Plaintiff") and alleges as follows:

JURISDICTIONAL ALLEGATIONS

1. This Court has Federal subject matter jurisdiction over this matter pursuant to 28 U.S.C. §1332 because the parties are completely diverse in citizenship and the amount in controversy exceeds \$75,000. Plaintiff's sole member is a California citizen and both defendants are corporations incorporated in Washington and citizens of Washington for diversity purposes.

2. Venue is proper under 28 U.S.C. §§1391(b), (c), and (d), because on information and belief, one or more of the Defendants reside in, are licensed to do

1 business in, are doing business in, had agents in, or are found or transact business
2 in this District, a substantial part of the events giving rise to Plaintiffs' claims
3 occurred in this District, and a substantial portion of the affected interstate trade
4 and commerce has been carried out in this District. Defendants' listings are and
5 have been used for thousands of real estate transactions in this District.

6 3. This Court has personal jurisdiction over the Defendants because each,
7 either directly, or through the ownership and/or control of their subsidiaries, *inter*
8 *alia*: (a) transacted business in California, including in this District; (b) directly or
9 indirectly sold or marketed real estate listing services in California, including in
10 this District; or (c) had substantial aggregate contacts with California, including in
11 this District. Defendants also conduct business throughout the United States,
12 including in California and this District, and have purposefully availed themselves
13 of the laws of California.

14 **THE PARTIES**

15 4. Plaintiff 924 Bel Air Road, LLC is a California limited liability company
16 with its principal place of business in Los Angeles, California.

17 5. Plaintiff is informed and believes, and based thereon alleges, that Defendant
18 Zillow, Inc. is a corporation formed under the laws of the State of Washington,
19 with its headquarters located in Seattle, Washington.

20 6. Plaintiff is informed and believes, and based thereon alleges, that Defendant
21 Zillow Group, Inc., is a corporation formed under the laws of the State of
22 Washington, with its headquarters located in Seattle, Washington. Zillow is a
23 wholly owned subsidiary of Zillow Group.

24 7. Plaintiff does not know the true names of Defendants 1 through 10 and
25 therefore sue them by those fictitious names. Plaintiff will seek leave of the Court
26 to insert their true names and capacities when ascertained. Plaintiff is informed and
27 believes that each of the fictitiously designated defendants is responsible to it in the
28

1 same fashion as the identified defendants. Plaintiff is informed and believes, and
2 based upon such information and belief alleges, that each of the fictitiously named
3 DOE Defendant is responsible in some manner, way, or form, and to some extent
4 for acts, events, breaches and occurrences hereinafter alleged, and that Plaintiff's
5 damages as hereinafter alleged were proximately caused by their conduct.

6 Wherever appearing in this complaint, each and every reference to "Defendant"
7 and/or "Defendants" is intended and shall be a reference to all Defendants in this
8 action, and each of them, including all fictitiously named DOE Defendants.

9 8. Plaintiff is informed and believes, and based upon such information and
10 belief alleges, that at all times relevant to this action, each of the Defendants
11 named herein were the agent, principal, representative, joint-venturer, alter ego,
12 and/or partner (of any kind) of each and every other Defendant and, in doing the
13 things hereinafter alleged, was acting within the course and/or scope of such
14 authority as the agent, principal, representative, joint-venturer, and/or partner (of
15 any kind) with the permission and consent of the remaining Defendants.

16 **GENERAL ALLEGATIONS**

17 9. The Zillow Defendants are real estate companies that operate, among other
18 ventures, an online residential real estate database, which is publicly available at
19 the URL www.zillow.com and its subpages (hereinafter the "Zillow Website").
20 The Zillow Website is the market leader in the online real estate database space.

21 10. The Zillow Website publishes information on over 110 million homes across
22 the United States, with a page ("Residence Page") designated for each of the 110-
23 million plus homes, including homes listed for sale and off-market homes. Each
24 Residence Page displays information about the subject residence, such as property
25 taxes information, public school districting, and lot dimensions. The Residence
26 Page also displays price and tax history.

27 11. Zillow markets itself as "the leading real estate and rental marketplace
28

1 dedicated to empowering consumers with data, inspiration and knowledge around
2 the place they call home”¹.

3 12. Plaintiff owns and is presenting, and marketing property located at 924 Bel
4 Air Road, Los Angeles, California 90077 (the “Property”) through brokers, Nest
5 Seekers International and Hilton & Hyland. The listing price for the Property is
6 \$150,000,000. The property is perched on top of one of Los Angeles’s most
7 prestigious streets with 360-degree breathtaking views of the ocean.

8 13. Plaintiff spent significant time and resources building the single-family
9 residence and grounds. Plaintiff is owned by one of Los Angeles’s most prolific
10 home builders, Bruce Makowsky.

11 14. For example, one of Bruce Makowsky’s related entities sold the highest
12 priced home ever in the City of Beverly Hills, California. Bruce Makowsky is a
13 market disrupter that has built some of Los Angeles’s most magnificent homes.

14 15. Plaintiff and it’s member have spent millions of dollars to develop “Bruce
15 Makowsky’s greatest masterpiece. Located in the confines of the ultra-exclusive
16 Bel Air Enclave. The pinnacle of splendor and luxury.”²

17 16. On multiple occasions, Zillow admittedly published false information,
18 through its own website, namely that 1) the property sold; 2) that the Property sold
19 at a price much lower than asking; and 3) that there would be an open house.
20 These false publications occurred on multiple occasions even after they were
21 warned by counsel for the Plaintiff and by the agents for the Plaintiff.

22 17. Defendants published, but not limited to, the following false statements:

- 23 a. The Property sold on February 4, 2019 for \$110,000,000 (Exh. A);
- 24 b. The Property had an open house scheduled for Friday, February 8,
25 2019 from 1-4pm (Exh. B);

26
27 ¹ <https://www.zillow.com/corp/About.htm>

28 ² https://www.zillow.com/homedetails/924-Bel-Air-Rd-Los-Angeles-CA-90077/20529647_zpid/

1 c. The Property sold on February 9, 2019 for \$90,540,000 (Exh.C);

2 d. The Property sold on February 10, 2019 for \$94,300,000 (Exh.D);

3 18. Zillow is disseminating misleading, false, and inaccurate information that
4 has a large prominence because of Zillow's market power. Brokers, agents, and
5 real estate colleagues wrote to and called Plaintiff's agents to congratulate them on
6 the sale of the Property when, in fact, it had not been sold. Zillow published this
7 false information on multiple occasions after being told the property had in fact,
8 not been sold. Zillow negligently reported this false information to the public on
9 numerous occasions. These were not small errors. The false reporting was off
10 from ranges of \$40,000,000.00 to \$59,000,000.00. The permanent market
11 perception was that the property is now below \$100,000,000.00. This removed the
12 property out of the elite status of a \$100M plus property to something that was
13 heavily discounted.

14 19. Plaintiff's counsel demanded Defendants take down the false information on
15 multiple occasions. Defendants acknowledged that they were "aware of the issue."
16 (Exh. E.) Despite knowledge of the false information, Defendants continued to
17 publish false information on a platform that has no regard for the owners of the real
18 property it injures. The Defendants hide behind outdated Congressional laws that
19 immunize websites who allow users to publish information. However, those laws
20 do no cover websites that aid and abet criminal or illegal postings and take no
21 safeguards to protect victims of these brazen attacks on U.S. Citizen's property.
22 This lawsuit is an attempt to halt these negligent practices which are victimizing
23 U.S. property owners and specifically owners of property in the Central District of
24 California.

25 20. Defendant complained to Zillow of the false information and yet, it took
26 Defendants over a week to remedy the situation and remove the false postings and
27 false claims of ownership. Defendants were negligent in that they did not
28

1 immediately take down the false information after Plaintiff complained to Zillow.
2 The Defendants have no mechanism to halt these illegal claims of ownership and
3 illegal claims of sales of property that never happened.

4 21. Attached as Exhibit F is an email thread with Zillow. Zillow was notified of
5 the problem. Defendants explained, “Any home on our website can be claimed by
6 the homeowner. There are a series of questions that must be answered, but if
7 someone attempts to claim it enough times, they will know the questions asked
8 (and be able to figure out what information they need to verify their identity.” (See
9 Exh. F.) Defendants further explained, “Our verification process is not manually
10 reviewed by an individual each time, and the person who claimed the home was
11 able to get around some of our standard required information, such as name and
12 phone number.”

13 22. Defendants were negligent in that they do not have safeguards in place to
14 prevent internet trolls, criminals, or persons designed to commit illegal acts from
15 logging into their system to post the false information. They do not have
16 safeguards to prevent fake accounts with fake emails and fake phone numbers from
17 publishing false information on their website³. Defendants knew or should have
18 known that trolls, criminals, and persons illegally claiming ownership of property
19 and falsely contending it was sold that could easily bypass their standard questions
20 to “claim a home” and post false information. It was reasonably foreseeable that
21 this would happen. Yet, the Defendants have done nothing about it and simply do
22 not care about the homeowners they hurt in the process.

23 23. At the very minimum, Defendants should require that a real email and a real
24 phone number be used. Defendants allowed someone without a real phone number
25 to hijack and steal this Property’s page and lie about a sale on multiple occasions.

27 ³ Defendants confirmed the contact information and the IP of the user that input the false
28 sales information was: Email: 910028863@qq.com; Phone: (177) 458-7597; IP Address:
27.227.61. (See Exh. F, highlighted portions.)

1 The area code of the phone number does not exist. Had Defendants had proper
2 safety protocols in place, this would not have happened. Their system should not
3 allow a fake user to commandeer someone else's home and post false information,
4 thereby causing damage and lie about the sales price by a range from \$40M to
5 \$59M. It is patently wrong, and Congress could have never envisioned
6 immunizing a company from this type of negligence. This complaint is about
7 careless business practices that harbors criminals, cheats, illegal persons designed
8 to ruin a property's value, not about free speech or user reviews.

9 24. Zillow simply does not have safeguards in place to prevent who can falsely
10 report this information nor does it safeguard false reporting. It is simply
11 astounding that on three separate occasions it could falsely report errors totaling
12 over \$60,000,000.

13 25. Most buyers of real estate go online to look up various homes. Zillow's
14 negligence interferes with Plaintiff's business and marketing by disseminating
15 false and misleading information. Zillow is disrupting the flow of information and
16 impeding buyers' access to an accurate list of for sale homes. The greatest harm
17 that Zillow can inflict on a home is a false sales price \$60,000,000 below listing
18 price.

19 26. Zillow falsely reported numerous sales tens of millions of dollars below the
20 actual listing price, causing measurable and serious loss to Plaintiff's asset and
21 ability to market the Property. Zillow did not immediately remove the false
22 postings after Plaintiff notified Defendants of the fraud because they only have an
23 email address or an online complaint form. Plaintiff has been unable to sell the
24 Property. Potential buyers believe that the Property in fact was sold and the market
25 is now permanently infected with false information that the property sold below
26 \$100M, \$60M under the listing price. It is a very small market in this space. For
27 the Property to be labeled sold numerous times million of dollars below the listing
28

1 price corrupts the listing price dramatically.

2 27. As a result of Zillow's publication of false information, Plaintiffs have been
3 injured.

4 **FIRST CAUSE OF ACTION**

5 **Negligence**

6 **(Against all Defendants)**

7 1. Plaintiff incorporates each and every Paragraph above as though fully
8 set forth herein.

9 2. Defendants owed Plaintiff a duty of due care because it was
10 foreseeable that Plaintiff would be harmed by Defendants' publication of false
11 information and the degree of certainty that Plaintiff suffered harm. Public policy
12 is in favor of imposing a duty of care on Defendants because of the nature of their
13 business, which carries consequences to the community. Public policy clearly
14 supports imposing a duty of care on Zillow, as the market leader in the online real
15 estate database space, which consumers rely on for real estate information.

16 3. Defendants knew or should have known that the information was false
17 because the Property was not sold. Defendants know that their "tools and
18 processes designed to ensure the accuracy, quality, and legality of such content
19 may not always be effective."⁴ Defendants know that they may be subject to legal
20 liability because of their errors in publishing inaccurate information. Defendants
21 knew or should have known that publishing false information on the Zillow
22 Website would cause Plaintiff injury because a reasonably person would rely on
23 the information published on the Zillow Website.

24 4. Defendants knew or should have known that trolls could easily bypass
25 their standard questions to "claim a home" and post false information. It was
26 reasonably foreseeable that this would happen. Defendants knew or should have
27

28 ⁴ United States Securities and Exchange Commission, Form 10-K for Zillow Group, Inc.

1 known that anyone could try guessing the answers to their standard questions a
2 couple times before figuring out the correct answers.

3 5. Defendants knew or should have known that a fake account with a
4 fake email address was posting false information. It is impossible that the person
5 and the phone number be real because the area code is fake.

6 6. Defendants were negligent in that they allowed someone without a
7 real phone number to hijack the Residence Page.

8 7. The fake account did this on multiple occasions and yet, Defendant
9 did not stop the account. Had Defendants implemented a proper safeguard, it
10 would have prevented the harm caused to Plaintiff. Instead, the fake posting from
11 the fake account continued and the damage to Plaintiff worsened.

12 8. Defendants failed to take reasonable steps to protect the consumers,
13 buyers and sellers.

14 9. Defendants breached the duty of care. Defendants negligently
15 reported this false information. In the alternative, Zillow is was negligent because
16 Zillow does not have safeguards as to who can falsely report this information.

17 10. Defendants knew or should have known Plaintiff would suffer
18 damages. Plaintiff was harmed as a proximate result of the breach of duty.

19 11. As a direct and proximate result of Defendants' negligent conduct,
20 Plaintiffs have not been able to sell the Property. Nor can Plaintiff properly market
21 and advertise the Property. Additionally, by labeling the Property sold numerous
22 times millions of dollars below the listing price corrupts the listing price
23 dramatically.

24
25
26 ///

27 ///

1 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- 2 1. For damages of \$60,000,000.00;
- 3 2. For prejudgment interest;
- 4 3. For costs of suit; and
- 5 4. For such other and further legal and equitable relief as the Court
- 6 deems just and proper.

7

8

9

10 DATED: February 24, 2019

11 LAW OFFICES OF

12 RONALD RICHARDS &

13 ASSOCIATES, A.P.C

14 /s/ Ronald Richards

15 By:

16 RONALD N. RICHARDS, Esq.

17 MORANI STELMACH, Esq.

18 JUSTIN IBRAHIM, Esq.

19 Attorneys for Plaintiff 924 Bel Air Road,

20 LLC

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27

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EXHIBIT A




[Public View](#)
[Owner View](#)

California · Los Angeles · 90077 · Beverly Glen · 924 Bel Air Rd

[Public View](#)
[Owner View](#)



1 of 15
 [Map >](#)


 Street View

924 Bel Air Rd

Los Angeles, CA 90077

12 beds · 21 baths · 38,000 sqft

SOLD:
\$110,000,000

Sold on
02/04/19


Zestimate®:
\$61,761,697

EST. REFI PAYMENT

Est. Refi Payment:
\$431,723/mo

Home Shoppers are Waiting

Ask an agent about market conditions in your neighborhood.






EXHIBIT B

Ronald Richards

From: Zillow <my-saved-home@mail.zillow.com>
Sent: Thursday, February 7, 2019 10:18 PM
To: Ronald Richards
Subject: Open House: 924 Bel Air Rd, Los Angeles, CA 90077



Saved Home

This home has an open house scheduled on **Fri., Feb 8 from 1-4pm.**



♥ FOR SALE

\$150,000,000

12 bd, 31.0 ba, 38,000 sqft

924 Bel Air Rd, Los Angeles, CA

[View home](#)

[See all saved homes](#)

[Unsubscribe from this email](#)

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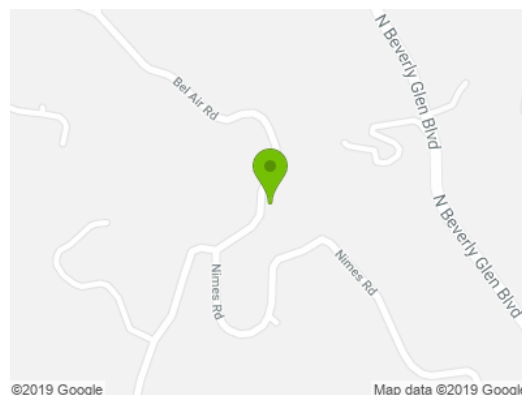
EXHIBIT C

 SHARE

City, State, or Zip



924 Bel Air Rd, Los Angeles, CA 90077



**924 Bel Air Rd,
Los Angeles, CA 90077**
12 beds • 31 baths • 38,000 sqft

SOLD: \$90,540,000

Sold on 02/09/19

Zestimate®: \$64,594,238**EST. REFI PAYMENT****Est. Refi Payment:****\$354,628/mo**

924 Bel Air Rd, Los Angeles, CA is a multi family home that contains 38,000 sq ft and was built in 2016. It contains 12 bedrooms and 31 bathrooms. This home last sold for \$90,540,000 in February 2019.

The Zestimate for this house is \$64,594,238, which has decreased by \$52,317,913 in the last 30 days. The Rent Zestimate for this home is \$229,178/mo, which has decreased by \$20,822/mo in the last 30 days. The property tax in 2018 was \$1,364,528. The tax assessment in 2018 was \$113,871,000, an increase of 803% over the previous year.

WHAT I LOVE ABOUT THE HOME

?????????,?????,???????????????

Facts and Features**Type**

Multi Family

**Year Built**

2016

**Heating**

Forced air

**Cooling**

Central, Other, Refrigeration

**Parking**

6 spaces

**MLS #**

No Data

INTERIOR FEATURES**Bedrooms**

Beds: 12

Bathrooms

Baths: 21 full, 4 three-quarter, 2 half, 4 quarter

Other Rooms

Rooms: Bonus Room, Breakfast, Den, Living Room, Wine Cellar, Other, Media Room, Powder, Entry, Master Bedroom, Dressing Area, Formal Entry, In-Law Suite, Home Theatre, Study, Utility Room, Great Room, Separate Maids Qtrs, Two Masters, Billiard Room, Servants Quarters, Rec Room, Retreat

Heating and Cooling

Heating: Forced air

Appliances

Appliances included: Dishwasher, Dryer, Freezer,

Home Value

Zestimate
\$64,594,238

ZESTIMATE RANGE
\$36.82M - \$100.12M



LAST 30 DAY CHANGE
-\$52,317,913 (-44.7%)

Price / Tax History

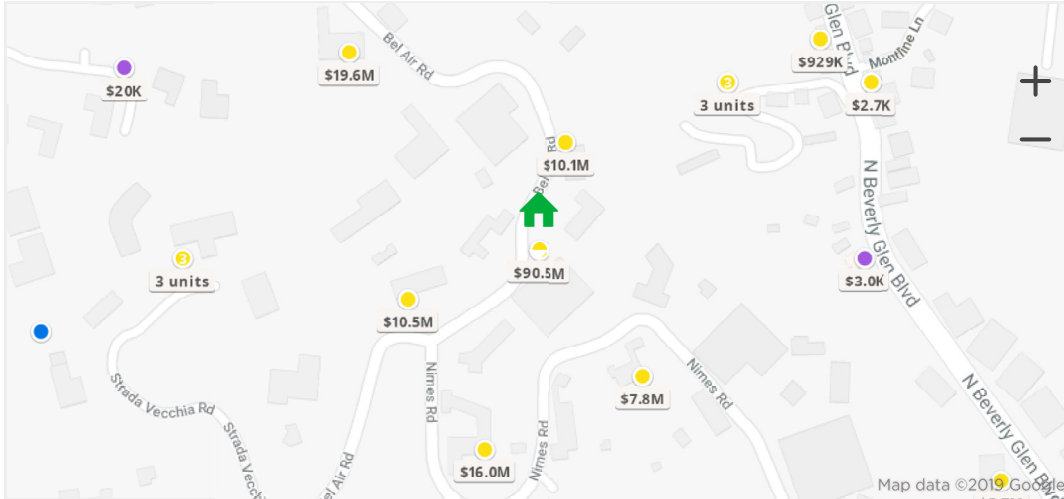
DATE	EVENT	PRICE		\$/SQFT	SOURCE
02/09/19	Listing removed	\$150,000,000	+65.7%	\$3,947	Nest Seekers I...
02/09/19	Sold	\$90,540,000	-39.6%	\$2,382	--
01/15/19	Price change	\$150,000,000	-20.2%	\$3,947	Hilton & Hylan...
07/12/18	Listed for sale	\$188,000,000		\$4,947	Nest Seekers
05/09/18	Listing removed	\$188,000,000		\$4,947	Nest Seekers I...
04/13/18	Listed for sale	\$188,000,000	-24.8%	\$4,947	Nest Seekers
06/27/17	Listing removed	\$250,000,000		\$6,578	Hilton & Hylan...
01/23/17	Listed for sale	\$250,000,000	+2,173%	\$6,578	Hilton & Hylan...
07/25/13	Sold	\$11,000,110	+39.2%	\$289	
05/07/12	Sold	\$7,900,079		\$207	

Neighborhood: Beverly Glen

Zillow predicts will increase 0.3% next year, compared to a 2% increase for Los Angeles as a whole. Among 90077 homes, this home is valued 2446.9% more than the midpoint (median) home, and is valued 158.4% more per square foot.

 Walk Score® 2 (Car-Dependent)  Transit Score™ 28 (Some Transit)

NEIGHBORHOOD MAP



NEARBY HOMES

<		>
OFF MARKET: ZESTIMATE		
\$7,237,963	8 bds · 5 ba · -- sqft	
922 Bel Air Rd, Los Angeles, CA		
OFF MARKET: ZESTIMATE		
\$16,343,080	4 bds · 6 ba · 8,974 sqft	
938 Bel Air Rd, Los Angeles, CA		

Nearby Schools in Los Angeles

GREAT SCHOOLS RATING [?]		GRADES	DISTANCE
5 out of 10	Brentwood Science School	K-5	3.3 mi
5 out of 10	Emerson Community Charter School	6-8	2.3 mi
7 out of 10	University Senior High	9-12	3.1 mi

Data by [GreatSchools.org](#) [?]

About the ratings: Historically, GreatSchools ratings have been based solely on a comparison of standardized test results for all schools in a given state. As of September 2017, the GreatSchools ratings also incorporate additional information, when available, such as college readiness, academic progress, advanced courses, equity, discipline and attendance data. GreatSchools ratings are designed to be a starting point to help parents compare schools, and should not be the only factor used in selecting the right school for your family.

Disclaimer: School attendance zone boundaries are provided by a third party and subject to change. Check with the applicable school district prior to making a decision based on these boundaries.

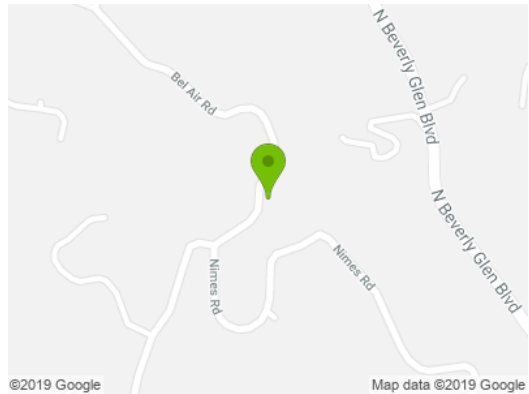
EXHIBIT D

SHARE

City, State, or Zip



924 Bel Air Rd, Los Angeles, CA 90077



924 Bel Air Rd,
Los Angeles, CA 90077
12 beds · 31 baths · 38,000 sqft

SOLD: \$94,300,000

Sold on 02/10/19

Zestimate®: \$69,138,292

EST. REFI PAYMENT

Est. Refi Payment:

\$368,166/mo



Note: This property is not currently for sale or for rent. The description below may be from a previous listing.

Luxury developer Bruce Makowsky's greatest masterpiece. Located in the confines of ultra-exclusive Bel Air Enclave. The pinnacle of splendor & luxury. 38k sq ft new construction home +17k sqft of entertainment decks, 2 master suites, 10 over-sized VIP guest suites, 21 luxurious bathrooms, 3 gourmet kitchens, 5 bars, massage studio/wellness spa, state-of-the-art fitness center, 85-foot glass tile infinity swimming pool, 40-seat 4K Dolby Atmos Theater, 4 lane bowling alley/lounge, auto gallery w/cars worth more than \$30mm, 7-person full time staff, over 100 curated art installations, outdoor pop-up theater, 2 fully-stocked champagne/wine cellars, massive candy wall, the most advanced home tech system in the world. Astonishing array of amenities & bespoke items from around the world, 4 meticulously curated levels, indoor/outdoor nirvana enhanced by 270-degree unobstructed views spanning from the mountains all the way to the ocean & the incredible Los Angeles skyline in-between.


...


Facts and Features


 **Type**
Single Family

 **Year Built**
2016

 **Heating**
Forced air

 **Cooling**
Central, Other

 **Parking**
6 spaces

 **Lot**
1.08 acres

INTERIOR FEATURES

Bedrooms

Beds: 12

Other Rooms

Rooms: Bonus Room, Breakfast, Den, Living Room, Wine Cellar, Other, Media Room, Powder, Entry, Master Bedroom, Dressing Area, Formal Entry, In-Law Suite, Home Theatre, Study, Utility Room, Great Room, Separate Maids Qtrs, Two Masters, Billiard Room, Servants Quarters, Rec Room, Retreat

Attic
Attic

Appliances

Appliances included: Dishwasher, Dryer, Freezer, Cooktop, dishwasher, Microwave, Refrigerator, Washer

Home Value

Zestimate
\$69,138,292

ZESTIMATE RANGE
\$33.88M - \$84.35M

LAST 30 DAY CHANGE
-\$45,537,997 (-39.7%)

Owner Dashboard



Do you own this home? See your Owner Dashboard.

Price / Tax History

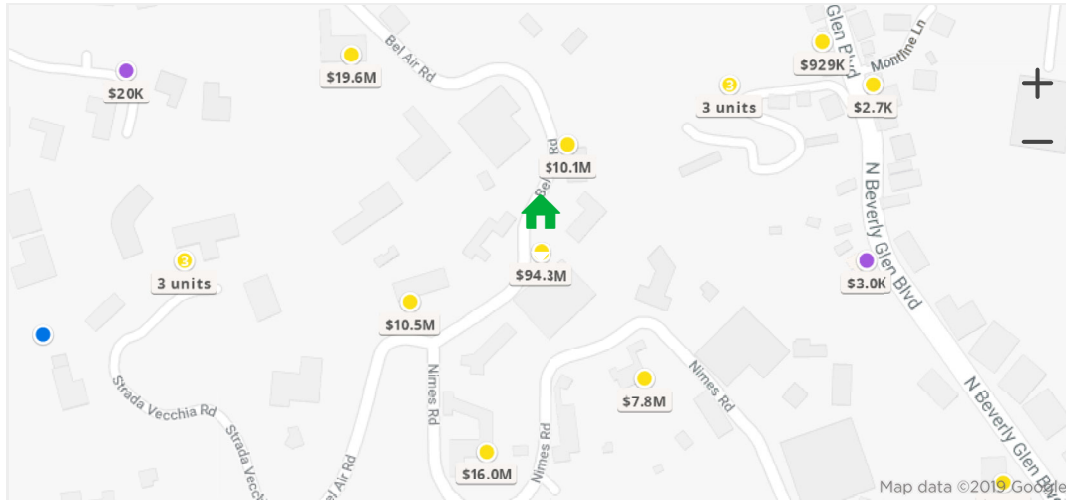
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Neighborhood: Beverly Glen

Zillow predicts will increase 0.3% next year, compared to a 2% increase for Los Angeles as a whole. Among 90077 homes, this home is valued 2626.1% more than the midpoint (median) home, and is valued 169.1% more per square foot.

 **Walk Score**® 2 (Car-Dependent)  **Transit Score**™ 28 (Some Transit)

NEIGHBORHOOD MAP



NEARBY HOMES



OFF MARKET: ZESTIMATE
\$7,206,470 8 bds · 5 ba · -- sqft
 922 Bel Air Rd, Los Angeles, CA



OFF MARKET: ZESTIMATE
\$16,341,266 4 bds · 6 ba · 8,974 sqft
 938 Bel Air Rd, Los Angeles, CA

Nearby Schools in Los Angeles

GREATSCHOOLS RATING 

GRADES DISTANCE

5 out of 10	Brentwood Science School	K-5	3.3 mi
5 out of 10	Emerson Community Charter School	6-8	2.3 mi
7 out of 10	University Senior High	9-12	3.1 mi

Data by [GreatSchools.org](#) 

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additional information, when available, such as college readiness, academic progress, advanced courses, equity, discipline and attendance data. GreatSchools ratings are designed to be a starting point to help parents compare schools, and should not be the only factor used in selecting the right school for your family.

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Similar Homes for Sale	Nearby Similar Sales
<div><div>FOR SALE \$49,900,000 8 beds, 20.0 baths, 3600... 277 Saint Pierre Rd, Los An</div></div>	<div>SOLD: \$56,000,000 Sold on 5/11/2018 9 beds, 15.0 baths, 38000 sqft 630 Nimes Rd, Los Angeles, CA 90077</div>
<div><div>FOR SALE \$88,000,000 9 beds, 15.0 baths, 24922... 822 Sarbonne Rd, Los Angi</div></div>	
<div><div>FOR SALE \$100,000,000 8 beds, 21.0 baths, 4000... 10697 Somma Way, Los Ar</div></div>	
<div><div>FOR SALE \$59,995,000 8 beds, 12.0 baths, 2700... 10701 Bellagio Rd, Los Ang</div></div>	

EXHIBIT E

Subject: FW: [Zillow Help Center] Re: 924 Bel Air Rd, Los Angeles, CA 90077
Date: Tuesday, February 12, 2019 at 2:51:18 PM Pacific Standard Time
From: Ronald Richards
To: Morani Stelmach
Attachments: image001.jpg

Sincerely,

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
310-556-1001 Office
310-277-3325 Fax
www.ronaldrichards.com

Mailing Address:
P.O. Box 11480
Beverly Hills, CA 90213

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THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT BEFORE YOU PRINT THIS MESSAGE.
THANK YOU.

From: Maricar (Support) <dmca_notice_email@zillow.com>
Sent: Tuesday, February 12, 2019 2:50 PM
To: Ronald Richards <ron@ronaldrichards.com>
Subject: [Zillow Help Center] Re: 924 Bel Air Rd, Los Angeles, CA 90077

##- Please type your reply above this line -##

Your request (6594784) has been updated. To add additional comments, reply to this email.



Maricar (Zillow Help Center)

Feb 12, 2:50 PM PST

Hello,

Thank you for reaching back and I apologize for the delay.

Please be advised that your property page has been updated. The erroneous sold transaction has been removed. You may verify the changes made here:

https://www.zillow.com/homedetails/924-Bel-Air-Rd-Los-Angeles-CA-90077/20529647_zpid/?fullpage=true

Thank you for using Zillow!

Maricar

Consumer Care Advocate

Zillow Help Center

<https://zillow.zendesk.com/hc/en-us>



Ronald Richards

Feb 9, 10:14 AM PST

Dear Sirs,

This is the second time in a week you have falsely reported a sale. Now you are reporting this sold at \$90,000,000.

Please remove this false and libelous reporting immediately.

We are reserving all rights and claims.

Sincerely,

Ronald Richards, Esq.

Law Offices of Ronald Richards & Associates, A.P.C.

310-556-1001 Office

310-277-3325 Fax

www.ronaldrichards.com (<http://www.ronaldrichards.com/>)

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Attachment(s)

[image001.jpg](#)



Maricar (Zillow Help Center)

Feb 7, 1:34 PM PST

Hello,

Thank you for taking the time to report this to us. I apologize for any inconvenience this has caused. Our developers are aware of the issue and are actively working towards a resolution. I appreciate your patience and will follow up with you as soon as possible.

In the meantime, please let me know if there is anything else that I can assist with.

Thank you for using Zillow!

Maricar

Consumer Care Advocate

Zillow Help Center

<https://zillow.zendesk.com/hc/en-us>



Ronald Richards

Feb 7, 8:52 AM PST

Dear Sirs,

You are falsely reporting my clients property has been sold for \$110,000,000, when in fact the property has not been sold.

Please remove this false and libelous reporting immediately. We are reserving all rights and claims.

Sincerely,

Ronald Richards, Esq.

Law Offices of Ronald Richards & Associates, A.P.C.

310-556-1001 Office

310-277-3325 Fax

www.ronaldrichards.com (<http://www.ronaldrichards.com/>)

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Attachment(s)

[image001.jpg](#)

EXHIBIT F

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Date: Friday, February 15, 2019 at 12:03:06 PM Pacific Standard Time

From: Kim Nielsen

To: Ronald Richards

CC: Morani Stelmach

Thank you for confirming. We are going to remove them as the owner of the home and block that email address from Zillow. If you can provide me with a name and email address, I can ask our team to auto-claim the home to that person so only that person and the listing agent can make any changes to this listings.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>

Date: Friday, February 15, 2019 at 11:51 AM

To: Kim Nielsen <knielsen@zillowgroup.com>

Cc: Morani Stelmach <morani@ronaldrichards.com>

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

No we don't know that person and I'm going to write them now and ask them why they're trying to claim the house

Ronald Richards, Esq.
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[Beverly Hills, CA 90213](mailto:BeverlyHillsCA90213@bellsouth.net)

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THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT BEFORE YOU PRINT THIS MESSAGE. THANK YOU.

On Feb 15, 2019, at 10:56 AM, Kim Nielsen <knielsen@zillowgroup.com> wrote:

Dear Mr. Richards,

The following email address just tried to claim ownership of this address. Can you please confirm for me if this email address should be associated with this home?
andersgraff@icloud.com

Best,
Kim

From: Kim Nielsen <knielsen@zillowgroup.com>
Date: Friday, February 15, 2019 at 10:06 AM
To: Ronald Richards <ron@ronaldrichards.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Mr. Richards,

Here is the information I received from our customer care team. These events were all generated by the same user account (910028863@qq.com) with the exception of an edit on 2/7/19 which is from the listing agent.

2/10/19 – Sold 94,300,000

This previously appeared in the Price History section and was removed in response to customer care ticket.

2/9/19 – Sold 90,540,000

This previously appeared in the Price History section. Removed per request by ZG legal.

2/9/19 – Edited facts

The same user edited home facts on the active listing.

[2/7/19 - The listing agent (shawn@shawnelliott.com, ZUID 1741495) edited the listing through Zillow directly. This may correspond to the Open House but we don't have a way of seeing that information.]

2/5/19 – Sold 110,000,000

This previously appeared in the Price History section and was removed in response to customer care ticket.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE
Date: Friday, February 15, 2019 at 10:06:32 AM Pacific Standard Time
From: Kim Nielsen
To: Ronald Richards
CC: Morani Stelmach
Attachments: image001.jpg

Dear Mr. Richards,

Here is the information I received from our customer care team. These events were all generated by the same user account (910028863@qq.com) with the exception of an edit on 2/7/19 which is from the listing agent.

2/10/19 – Sold 94,300,000

This previously appeared in the Price History section and was removed in response to customer care ticket.

2/9/19 – Sold 90,540,000

This previously appeared in the Price History section. Removed per request by ZG legal.

2/9/19 – Edited facts

The same user edited home facts on the active listing.

[2/7/19 - The listing agent (shawn@shawnelliott.com, ZUID 1741495) edited the listing through Zillow directly. This may correspond to the Open House but we don't have a way of seeing that information.]

2/5/19 – Sold 110,000,000

This previously appeared in the Price History section and was removed in response to customer care ticket.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>
Date: Friday, February 15, 2019 at 5:42 AM
To: Kim Nielsen <knielsen@zillowgroup.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: RE: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Hi Kim,

Thank you to your and your team for the explanation. Now that we had a chance to review your explanation, three more events we want to button up.

There was a posting that there was an open house on 2-7-19 and two more sales on 2-9 and 2-10.

One for \$90.540M and one for \$94.3m. This is in addition to the one for \$110m on 2-4.

Can you please document how all of these were reported because your explanation indicates that the user did this when they were releasing the property but these are three more distinct acts so we want to make sure it was the same user or different users or a system error.

Can you team please verify this? We can give you more detail if you have trouble seeing these postings. We have three different sales and prices plus an open house. We need to verify each one's cause.

Please confirm you have enough information to assist and that we can get this info today. Thank you again and I still don't have a phone number to call you on.

Sincerely,

Ronald Richards, Esq.
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**THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT BEFORE YOU PRINT THIS MESSAGE.
THANK YOU.**

From: Kim Nielsen [mailto:knielsen@zillowgroup.com]
Sent: Thursday, February 14, 2019 3:53 PM
To: Ronald Richards <ron@ronaldrichards.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Mr. Richards,

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Date: Thursday, February 14, 2019 at 5:12:06 PM Pacific Standard Time

From: Kim Nielsen

To: Ronald Richards

CC: Morani Stelmach

Unfortunately, if someone is able to provide responses to the verification questions, they are able to claim the home. As I mentioned, we do not manually check each time someone attempts to claim a home. One suggestion would be for the listing agent or company selling the home to go in and claim the home until it is sold. This will at least prevent someone else from being able to fraudulently claim ownership of the home.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>

Date: Thursday, February 14, 2019 at 5:00 PM

To: Kim Nielsen <knielsen@zillowgroup.com>

Cc: Morani Stelmach <morani@ronaldrichards.com>

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Thanks Kim I appreciate that information. How is it that someone with a fake phone number (bad area code) and Chinese IP address and email can hijack \$150 million home? Does the screening require any verification because these are obviously bogus users? I was just trying to understand it better so if you could please help me that would be great.

Ronald Richards, Esq.

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THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT BEFORE YOU PRINT THIS MESSAGE. THANK YOU.

On Feb 14, 2019, at 4:41 PM, Kim Nielsen <knielsen@zillowgroup.com> wrote:

Here is the contact information and IP of the user that input the false sales information.

Email: 910028863@qq.com

Phone: (177) 458-7597

IP Address: 27.227.30.61

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>

Date: Thursday, February 14, 2019 at 4:06 PM

To: Kim Nielsen <knielsen@zillowgroup.com>

Cc: Morani Stelmach <morani@ronaldrichards.com>

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

OK I appreciate this explanation but without the IP in the email address it's gonna be hard for me to verify this so if you could get that to me that would be very helpful and save a lot of resources. You're obviously under no obligation to shield an improper use.

When do you think you could let me know if you will be providing me the IP address and email address of the person who claimed the home was there's?

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
[310-556-1001](tel:310-556-1001) Office
[310-277-3325](tel:310-277-3325) Fax
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Mailing Address:
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[Beverly Hills, CA 90213](http://www.bhsnet.net)

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THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT BEFORE YOU PRINT THIS MESSAGE.
THANK YOU.

On Feb 14, 2019, at 3:53 PM, Kim Nielsen <knielsen@zillowgroup.com> wrote:

Dear Mr. Richards,

Thank you for your patience. We've been a bit stumped on your situation and it took a lot of Zillow team members to piece it all together. Below is the summary of what we understand happened:

1. We first received this new listing in our feed from The MLS/CLAW feed around January 15th.
2. On February 6th, an unknown person went in and claimed the home (for purposes of this email, I will call them User X).
 - a. Any home on our website can be claimed by the homeowner. There are a series of questions that must be answered, but if someone attempts to claim it enough times, they will know the questions asked (and be able to figure out what information they need to verify their identity).
 - b. Our verification process is not manually reviewed by an individual each time, and the person who claimed the home was able to get around some of our standard required information, such as name and phone number.
 - c. We typically would not release any personally information without a subpoena, but since we feel user X used our website in violation of our TOU, I am waiting for confirmation from our director of privacy that we can share the email and IP address with you to help prevent further fraudulent transactions. I should know within the next hour, but do not want to hold up this email any longer waiting to connect with him.
3. On February 7th, The MLS/CLAW listing was replaced by a listing directly from NestSeekers.
4. On February 10th, User X released their claim on the home.
 - a. When someone who has claimed ownership of a home releases that ownership, we ask them to provide us with a reason. The options are:

- (i) home was recently sold, (ii) person claimed ownership of the wrong home, or (iii) they no longer want to be the claimed owner of the home on Zillow.
 - b. If a person chooses option (i), they are given the option to provide us with the sale price and date. If a 'verified' homeowner provides us with a sale price and date, we display that information on our site until we are provided with evidence that it is incorrect.
 - c. User X choose option (i), and provided us with a sale date of 2/9/19 in the amount of \$90M
- 5. On February 10th, the posted was taken down as an active for-sale listing because we had receive manual notification that the home had sold.
 - 6. The listing was reposted as an active for-sale listing when it reappeared in the NestSeekers feed on February 11th.
 - 7. Upon receipt of your email on February 12th, we immediately looked into this issue and removed the sales information from February 9th.
 - 8. We have blocked the email address for User X from being able to interact with the Zillow site, but we recognize that this unfortunately does not prevent the person from creating a new account. If a false sale is reported again, please feel free to reach out to me directly and I will work with the teams to again remove it as quickly as we can.

I hope this provides you with the additional details you are looking for. I will let you know when I hear back from our director of privacy if we are able to share the email address and IP with you without a subpoena.

Please let me know if you have any additional questions.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>

Date: Thursday, February 14, 2019 at 1:31 PM

To: Kim Nielsen <knielsen@zillowgroup.com>

Cc: Morani Stelmach <morani@ronaldrichards.com>

Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Thank you.

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
[310-556-1001](tel:310-556-1001) Office
[310-277-3325](tel:310-277-3325) Fax
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On Feb 14, 2019, at 1:28 PM, Kim Nielsen <knielsen@zillowgroup.com> wrote:

Dear Mr. Richards,

Just want to send you a timing update - I have a meeting with the team in a few minutes and will get a response back to you within the next hour.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>
Date: Wednesday, February 13, 2019 at 4:21 PM
To: Kim Nielsen <knielsen@zillowgroup.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: RE: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Thank you. Your phone number is not on your signature header. Can you please provide?

Sincerely,

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
310-556-1001 Office

310-277-3325 Fax
www.ronaldrichards.com

Mailing Address:
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BEFORE YOU PRINT THIS MESSAGE. THANK YOU.**

From: Kim Nielsen <knielsen@zillowgroup.com>
Sent: Wednesday, February 13, 2019 4:20 PM
To: Ronald Richards <ron@ronaldrichards.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD,
PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Mr. Richards,

Great - I will plan to send additional details tomorrow. I am also available tomorrow at 1:30 for a call if needed to discuss this matter further.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>
Date: Wednesday, February 13, 2019 at 4:15 PM
To: Kim Nielsen <knielsen@zillowgroup.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: RE: NUMEROUS FALSE REPORTING OF SALES, 924 BEL
AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

No, of course not, but an update would be great. This was great.
Thank you.

Tomorrow is fine. Please let us know tomorrow if we are not going to get the information tomorrow.

Thank you again for the response.

This was what we needed.

Sincerely,

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
310-556-1001 Office
310-277-3325 Fax
www.ronaldrichards.com

Mailing Address:
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Beverly Hills, CA 90213

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**THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT
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From: Kim Nielsen <knielsen@zillowgroup.com>
Sent: Wednesday, February 13, 2019 4:13 PM
To: Ronald Richards <ron@ronaldrichards.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD,
PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Mr. Richards,

You originally requested information by February 15th, and that is the deadline I have set for the team that is looking into this matter. Although you have not heard from me today, we are diligently looking into this issue and trying to figure out what happened. I have some details, but they are not complete and I am not prepared to share what we think happened until we understand the entire chain of events. I can let you know that we removed the errant sales price from the price history yesterday. I anticipate having additional information for you tomorrow, but if your client needs to file the complaint today, we understand.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>
Date: Wednesday, February 13, 2019 at 3:08 PM
To: Kim Nielsen <knielsen@zillowgroup.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: RE: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD, PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Ms. Nielsen,

We have a draft complaint we can send over to see if you want to mediate this first or we can just file it. absent you providing us the information.

Our client is very upset about this and it is hard for us to keep delaying him. Can you please help us with some information?

Can we have a short call?

Sincerely,

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
310-556-1001 Office
310-277-3325 Fax
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Mailing Address:
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**THINK GREEN. PLEASE CONSIDER THE ENVIRONMENT
BEFORE YOU PRINT THIS MESSAGE. THANK YOU.**

From: Kim Nielsen <knielsen@zillowgroup.com>
Sent: Tuesday, February 12, 2019 11:52 AM
To: Ronald Richards <ron@ronaldrichards.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: Re: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD,
PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Mr. Richards,

Confirming receipt of your email. We are looking into the source of the sold information and will get back to you as soon as we have that information.

Best,
Kim

From: Ronald Richards <ron@ronaldrichards.com>
Date: Tuesday, February 12, 2019 at 7:09 AM
To: Zillow Group Legal <legal@zillowgroup.com>
Cc: Morani Stelmach <morani@ronaldrichards.com>
Subject: NUMEROUS FALSE REPORTING OF SALES, 924 BEL AIR RD,
PRE LITIGATION DEMAND-TIME SENSITIVE

Dear Legal,

Our office represents 924 Bel Air Rd LLC, the owner of 924 Bel Air Rd. in Los Angeles, CA, 90077. The accurate listing prices is \$150,000,000.

For the past week, your site has falsely reported numerous sales tens of millions of dollars below the actual listing price, causing measurable and serious loss to my client's asset and ability to market

the property.

Please provide us with the basis and source attributable to such reporting within five days or we assume it was simply an error on your sites software.

If would like to try and resolve this matter pre-litigation, please contact my office no later than February 15, 2019.

Otherwise, we have been instructed to file a large damages complaint against your company, which we are in the process of preparing and are happy to forward you upon request.

We look forward to your immediate attention to this matter.

Sincerely,

Ronald Richards, Esq.
Law Offices of Ronald Richards & Associates, A.P.C.
310-556-1001 Office
310-277-3325 Fax
www.ronaldrichards.com

Mailing Address:
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