

# 133th JUDICIAL DISTRICT

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market for stolen real property. Further, Defendant Antia Martinez has aided Defendants Francisca Rodriguez and Francisco Diaz Martinez by fraudulently obtaining notarizations for them to attach to forged deeds. This pattern of behavior is not new for Defendant Antia Martinez. She previously forged a deed and claimed ownership of real property, forcing the victim to resolve the fraud by a suit to quiet title.<sup>1</sup>

2. Defendant Jorge Villatoro and David Garcia Garcia were parties in a fraudulent chain of title that began with Defendant Vilatoro's deed forgery and ended with Defendant Antia Martinez's false claim to title, as well as her use and/or possession, of a property she did not own. In these transactions, Defendants Jorge Villatoro and David Garcia Garcia have hidden their identity using the false personas "Joe Wade" and "Marcos Diaz R," respectively. These instances of fraud are not anomalous for either of them. On at least one occasion, Defendant Jorge Villatoro forged a warranty deed, forcing the heirs of the legal owner to resolve the fraud through a suit to quiet title.<sup>2</sup> Separately, Defendant David Garcia Garcia has bought or otherwise received title to properties in which the "grantors" Alba and Jarin Martinez filed forged deeds falsely claiming

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<sup>1</sup> In a suit filed against Antia Martinez, Mario Cavazos, and Amelia Martinez, the court ordered that title to a property be quieted in its legal owner Anita Moore. *Moore v. Martinez*, Cause No. 201721456 (234th Dist. Ct. of Harris County, Tex. June 13, 2019). In the final judgement, the deed purporting to grant title Antia Martinez, as well as the one intended to grant title from Antia Martinez to Mario Cavazos and Amelia Martinez, were declared to have no force and effect; the court ordered that those documents be stricken from the records and that Anita Moore have immediate possession of the property. [1]

<sup>2</sup> The heirs of the deceased owner of a property in which Defendant Jorge Villatoro filed a forged deed filed a suit to quiet title against him. *Spencer v. Villatoro*, Cause No. 202335607 (295th Dist. Ct. of Harris County, Tex. Aug. 9, 2023). A default judgment was granted for the plaintiffs, declaring the deed void.

their ownership.<sup>3</sup>

3. Defendant Juan Guevara is another individual who has committed deed fraud with Defendant Antia Martinez. After forging a warranty deed purporting to transfer real property to himself, he fraudulently conveyed the property to her. Like other defendants in this lawsuit, Defendant Juan Guevara has been a somewhat prolific perpetrator of deed fraud. He previously forged deeds and claimed ownership of at least three properties, one of which he and his family continued to occupy after the filing of the forged deed. Further, he has been convicted of felony theft, including several counts of theft of real estate.<sup>4</sup>

4. Defendant David Carmona is believed to be Defendant Antia Martinez's husband or domestic partner. With Defendant Antia Martinez as "co-owner", he has bought at least one property which the seller, namely Defendant Juan Guevara, had obtained through deed fraud. He and Defendant Antia Martinez later conveyed the property to Victor Hugo Carmona-Silva, who is believed to be their relative.

5. Defendants Francisca Rodriguez and Francisco Diaz Martinez have emerged on the deed fraud market with the aid of the more experienced Defendant Antia Martinez. Defendant

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<sup>3</sup> In 2025, Harris County and the State of Texas filed a lawsuit against Alba Martinez and Jarin Martinez, alleging DTPA violations, real estate fraud, and fraudulent claims on real property. *State v. Martinez*, No. 202525038, (281st Dist. Ct, Harris County, Tex. July 30, 2025). Alba and Jarin Martinez had filed documents in the real property records, falsely claiming ownership of multiple properties, and had sold properties they did not own. In a default judgement for the plaintiffs, the court granted a permanent injunction prohibiting the defendants from engaging in fraud under the DTPA and ordered the recovery of civil penalties. The fraudulent documents were declared null, void, and of no legal effect.

<sup>4</sup> *State v. Guevara*, No. 156850501010, (178th Dist. Ct., Harris County, Tex. July 6, 2018), later refiled as *State v. Guevara*, No. 15929201010, (178th Dist. Ct, Harris County, Tex. Aug. 28, 2019.)

Francisca Rodriguez and/or Francisco Diaz Martinez created and forged three warranty deeds purporting to transfer property title to Defendant Francisco Diaz Martinez or to the fictitious persona “Juaquin Lozano.” Defendant Antia Martinez assisted in fraudulently obtaining notarizations to attach to the deeds. All three deeds were presented to the Harris County Clerk’s office by Defendant Francisca Rodriguez. It is believed that the three are related by birth or marriage.

6. The Defendants are engaging in an organized and broad scheme with each other to steal from the residents of Harris County. Title to real property is being fraudulently transferred from the rightful owners/heirs, only to be conveyed multiple times within the Defendants’ organization in an effort to hide their misdeeds.

7. Defendants’ conduct—stealing properties for financial gain by forging real property instruments—has no place in Harris County. Harris County, on behalf of the public, files this Original Petition and Application for Permanent Injunction, and complains that the Defendants (1) engaged in unlawful conduct in violation of the DTPA and (2) made, presented, and used false documents to be recorded as real property records in violation of Civil Practice and Remedies Code chapter 12.

8. Plaintiffs ask the Court to enjoin Defendants from engaging in further illegal conduct and award civil penalties, damages, and/or restoration of property or money to the victims of Defendants’ wrongful conduct, and any further relief authorized by law.

#### **I.** **DISCOVERY CONTROL PLAN**

9. Plaintiffs intend to conduct discovery under Level 2 in accordance with Texas Rule of Civil Procedure 190.3. This case is not subject to the restrictions of expedited discovery under

Texas Rule of Civil Procedure 169 because the relief sought includes non-monetary injunctive relief.

## **II.** **CLAIM OF RELIEF**

10. Plaintiffs seek non-monetary relief and civil penalties, damages to the victims, and/or the restoration of money and property acquired by means of unlawful acts or practices to victims, in a total amount that exceeds \$1,000,000.00. *See* Tex. R. Civ. P. 47(c)(4).

## **III.** **PARTIES**

11. Plaintiffs are the State of Texas and Harris County, Texas, acting by and through the Harris County Attorney, Abbie Kamin, under the authority of the laws of the State of Texas.

12. Defendant Antia Martinez is an individual who may be served with process at 10706 Bauman Rd, Houston, Texas 77076, or wherever she may be found.

13. Defendant Francisco Diaz Martinez is an individual who may be served with process at 910 Dunkley Dr, Houston, Texas 77076, or 207 Aldine Mail Route Rd, Houston, Texas 77037, or wherever he may be found.

14. Defendant Francisca Rodriguez is an individual who may be served with process at 514 Northaire Dr, Houston, Texas 77073, or wherever she may be found.

15. Defendant Jorge Villatoro is an individual who may be served with process at 2213 Pannell St, Houston, Texas 77026, or wherever he may be found.

16. Defendant David Garcia Garcia is an individual who may be served with process at 9614 Wind Flower Ln, Houston, Texas 77086, or wherever he may be found.

17. Defendant Juan Guevara is an individual whose last known address of residence was 601 Korff Drive, Houston, Texas 77037 but who has since been deported to El Salvador.

Defendant Juan Guevara's current whereabouts are unknown. Accordingly, Plaintiffs intend to request service by publication or other available and appropriate means of service from this Court after diligent search efforts are finalized.

18. Defendant David Carmona is an individual who may be served with process at 10706 Bauman Rd, Houston, Texas 77076, or wherever he may be found.

#### **IV. JURISDICTION AND AUTHORITY**

19. The relief sought is within the Court's subject matter jurisdiction under Article V, Section 8 of the Texas Constitution and Texas Government Code sections 24.007, 24.008, and 24.011.

20. Plaintiffs, acting by and through the Harris County Attorney, Abbie Kamin, are authorized to bring this action under: (1) DTPA sections 17.47 and 17.48, which protect consumers against false, misleading, and deceptive trade practices and (2) Texas Civil Practice and Remedies Code chapter 12, which prohibits the making, presenting, or use of fraudulent records.

#### **V. VENUE**

21. Venue is proper in Harris County pursuant to Texas Business and Commerce Code subsection 17.47(b) in that (1) Defendants have done business in Harris County, (2) transaction(s) that are the basis of this suit occurred in Harris County, and (3) Defendants, apart from Juan Guevara, reside in Harris County. During the conduct alleged, Juan Guevara lived in Harris County, but he has since been deported to El Salvador. Venue is also proper in Harris County pursuant to Civil Practice and Remedies Code section 12.004 in that the applicable documents were recorded in Harris County and the real properties at issue are located in Harris County.

**VI.**  
**PURPOSE OF SUIT**

22. The purpose of this suit is to obtain a permanent injunction; obtain an order that Defendants pay money damages, penalties, and/or exemplary damages to injured persons; and obtain any other further relief authorized by law resulting from Defendants' unlawful conduct as alleged in this Petition.

23. Plaintiffs have reason to believe Defendants have engaged in, and will continue to engage in, the unlawful acts or practices set forth in this Petition, and that Defendants adversely affected the lawful conduct of trade and commerce, thereby directly and indirectly affecting the people of Harris County and the State of Texas. Therefore, these proceedings are in the public interest.

**VII.**  
**TRADE AND COMMERCE**

24. At all times described herein, Defendants have engaged in conduct that constitutes "trade" and "commerce," as those terms are defined in DTPA subsection 17.45(6).

**VIII.**  
**ACTS OF AGENTS**

25. Whenever in this Petition it is alleged that Defendants did any act, it is meant that the named Defendants performed or participated in the act, or that the officers, agents, or employees of Defendants performed or participated in the act on behalf of and under the authority of Defendants.

**IX.**  
**PRESUIT NOTICES**

26. Prior to filing this suit, Plaintiffs, acting through the Office of the Harris County Attorney, notified Defendants of the general nature of the violations that are the subject matter of

this suit. In addition, prior to filing this suit, the Office of the Harris County Attorney provided notice of the general nature of the violations that are the subject matter of this suit to the Consumer Protection Division of the Office of the Attorney General.

## **X. BACKGROUND**

27. Defendants Antia Martinez, Francisca Rodriguez, Francisco Diaz Martinez, Jorge Villatoro, David Garcia Garcia, Juan Guevara, and David Carmona have falsely claimed ownership of several Harris County properties by executing and filing forged and/or fraudulent real property records with the Harris County Clerk's Office to be recorded in the real property records. Defendants have fraudulently conveyed title to properties they falsely claimed to own in order to hide their wrongdoing.

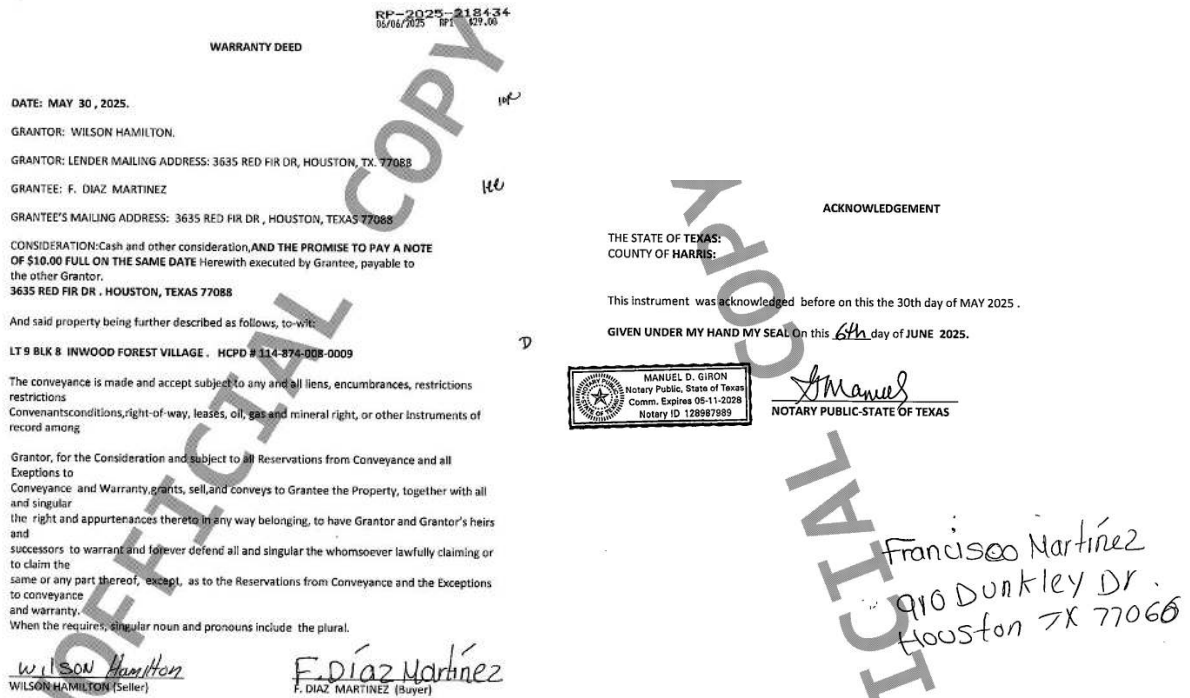
28. Below are examples of the Defendants' unlawful conduct. Subsection E, titled "Fraudulent Instruments Used by Defendants," lists the instruments used by the Defendants in their scheme.

29. This Petition and Application are supported by the Affidavit of Boyd Thomas, Legal Investigator, Office of the Harris County Attorney, attached as Exhibit A and incorporated herein by reference.

### **A. Deed Forgery involving Francisca Rodriguez, Antia Martinez, and/or Francisco Diaz Martinez**

30. In 2025, Defendant Francisca Rodriguez presented to the Harris County Clerk's office three forged warranty deeds for properties at 3635 Red Fir Drive (the 'Red Fir' property), 7222 Bywood Street (the 'Bywood' property), and 3819 Black Locust Drive (the 'Black Locust' property). One of the deeds purports to transfer title to the fictional persona "Juaquin Lozano,"

while the other two purport to transfer title to an “F. Diaz Martinez” or “F. Martinez D.” Despite the use of initials, the identity of this “grantee” is clear: on the deed for the Red Fir property appears Defendant Francisco Diaz Martinez’s name and address.

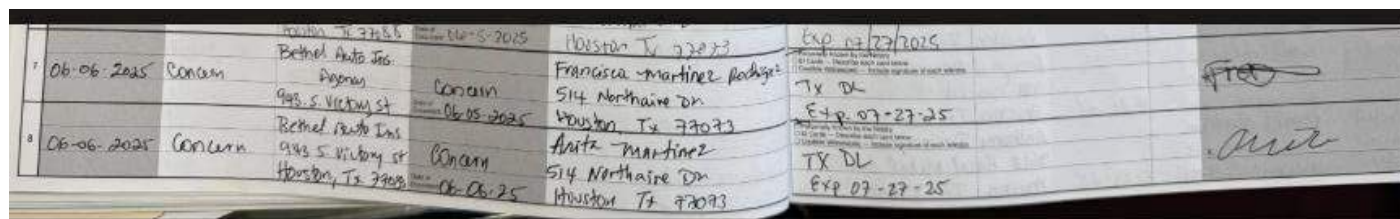
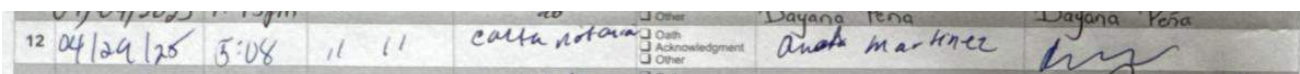


31. None of the purported “grantors” executed the deeds. Their signatures are forgeries:
  - a. JB and Jimmie Brossie, the legal owners of the Bywood property, had both died years before the purported execution of the deed and therefore did not sign it.
  - b. Curtis Carker, the legal owner of the Black Locust property, was living in an adult group home during the time the deed purports to have been executed. He was not aware of the creation or filing of the deed until his neighbor checked his mail for him and found a letter from the Clerk’s office indicating that he no longer had title to the property. The signature on the deed, purporting to be his, was forged.
  - c. “Wilson Hamilton,” the purported “grantor” on the deed in the Red Fir property is a fictitious person. The legal owner of the property is Latoya Hamilton, who

inherited the property from her mother. No person named “Wilson Hamilton ever had title to the property, nor does Latoya Hamilton have any relatives of that name.

32. Defendant Antia Martinez assisted Defendants Francisca Rodriguez and Francisco Diaz Martinez by tricking notaries into giving them notarizations to use on the deeds.

- a. On April 29, 2025 (the day before the deed was dated), Defendant Antia Martinez used notary Xiomara Mendoza’s services to notarize a letter for her child’s school. Twenty minutes after leaving the office, Defendant Antia returned and told Mendoza that she forgot to notarize a page. Mendoza stamped and signed the page, which included only a notary acknowledgement. The page was then attached to the forged deed in the Bywood property. Mendoza kept a scan of Antia Martinez’s driver’s license as well as a copy of the letter she notarized, which she showed to the Harris County Attorney’s Office.
- b. Defendant Antia Martinez, this time with Defendant Francisca Rodriguez, used the same or a similar scheme to obtain notary Manuel Giron’s notarization for the deed for the Red Fir property. Giron’s notary log contains both of their signatures. As shown in the below image of his notary log, Giron wrote the word “concern” beside their names.
- c. Notary Rodrigo Ortiz Martinez, whose notarization was used on the deed in the Black Locust property, has no record of the deed’s execution. It is likely that the defendants either fabricated a notary seal with Ortiz Martinez’s name and notary ID number or lifted the image of his seal from a document he notarized.



Images: Notary logs of Xiomara Mendoza (above) and Manuel Giron (below), showing the signatures of Defendants Francisca Rodriguez and Antia Martinez.

33. Now, due to the fraudulent conduct of Defendants Antia Martinez, Francisco Diaz Martinez and Francisca Rodriguez, the legal owners of and/or heirs to the properties lack clear title. Further, there is a risk these defendants will sell the property to bona fide purchasers or to other fraudsters seeking to profit from stolen real property.

## B. Deed Forgery and Fraudulent Transactions involving Antia Martinez, Jorge Villatoro, and David Garcia Garcia

### i. 4510 Teton, Houston, Texas 77051

34. In 2023, Defendant Jorge Villatoro presented a forged warranty deed to the Harris County Clerk's office to be filed in the real property records, which purported to transfer a property at 4510 Teton, Houston, Texas 77051 (the 'Teton property') from the deceased legal owner Emily Wade to "Joe Wade." Despite using the false persona "Joe Wade," Defendant Jorge Villatoro failed to conceal his identity. On the last page of the deed appear his name and address.

2  
REC  
A

THIS SPACE PROVIDED FOR RECORDER'S USE ONLY

RP-2023-4203  
01/04/2023 RP1 \$22.00

**Warranty deed**

Date: July 30, 2022

Grantor: WADE MRS EMILY O W  
Grantor's Mailing Address: 4510 Teton ST, TX 77051  
LT 19 BLK 16  
East Sunnyside Court Sec 1

Grantee: WADE JOE  
Grantee's Mailing Address: 6113 West Montgomery Rd Houston Texas, TX 77091

Consideration: Ten thousand and No/1000 (\$10,000.00) Dollars and other valuable consideration

Property (including any improvements)  
LT 19 BLK 16  
EAST SUNNYSIDE COURT SEC 1  
4510 TETON ST  
HOUSTON, TX 77051

RECORDED IN HARRIS COUNTY ACCOUNT NUMBER (072-020-016-0019).

For the consideration Grantors quit claims to Grantee all of Grantor's right, title, and interest in and to the property, to have and to hold in to Grantee, Grantee's heirs, executors, administrators, successors, or assigns forever. Neither Grantor nor Grantor's heirs, executors, administrators, successors, or assigns shall have, claim or demand any right or title to the property or any part of it

When the context requires, singular nouns and pronouns include the plural

WADE MRS EMILY  
WADE, MRS EMILY O W (Seller)

WADE JOE  
WADE, JOE (BUYER)

STATE OF TEXAS  
COUNTY OF HARRIS

This instrument was acknowledged before on this the 30<sup>th</sup> of July 2022

Notary Public  
NOTARY PUBLIC, STATE OF TEXAS

Notary Seal: State of Texas, Notary Public, My Commission Expires 01/01/2025, ID No. 12081846

pk Jorge D. Cruz Villatoro JJ  
223 Pennell St Houston TX 77026

*Images: Warranty deed with the forged signatures of Emily Wade and the fictitious “Joe Wade” (left). Excerpt of same warranty deed, showing Defendant Jorge Villatoro’s name and address (right).*

35. “Joe Wade” is a fictional person. No member of Emily Wade’s family is named Joe Wade. As Emily Wade had died in 2016, she could not have signed the deed which purports to have been executed in 2022.

36. Later in 2023, Jorge Villatoro executed a warranty deed purporting to transfer the Teton property to “Marcos Diaz R,” a false persona used by Defendant David Garcia Garcia to hide his identity<sup>5</sup>.

37. In 2025, David Garcia Garcia (still under the name “Marcos Diaz R.”) conveyed title to Defendant Antia Martinez, who presented to the Clerk’s office the warranty deed purporting

<sup>5</sup> The Harris County Clerk’s office keeps scans of the IDs of people who file documents in the real property records. David Garcia Garcia presented the deed to be filed in the Clerk’s office, and the Clerk’s office kept a scan of his ID along with a receipt for the filing fee.

to transfer title to her.

38. Emily Wade's heirs and family members have lost possession of the Teton property. As of a year before this filing, the house was occupied by people unknown to the Wade family, and alterations had been made to the exterior of the house and to the landscaping. No member of the Wade family has given anybody permission to occupy or alter the property after Emily Wade's death. It is believed that either Defendant Antia Martinez or individuals renting the property from her are in possession of the property.

39. Now, due to the fraudulent conduct of Defendants Jorge Villatoro, David Garcia Garcia, and Antia Martinez, Defendant Antia Martinez, who has no legal ownership interest, is reflected as having title to the property. The heirs of Emily Wade lack clear title and have been deprived of the use and possession of the property.

**C. Deed Forgery and Fraudulent Transactions involving Antia Martinez, David Carmona, and Juan Guevara**

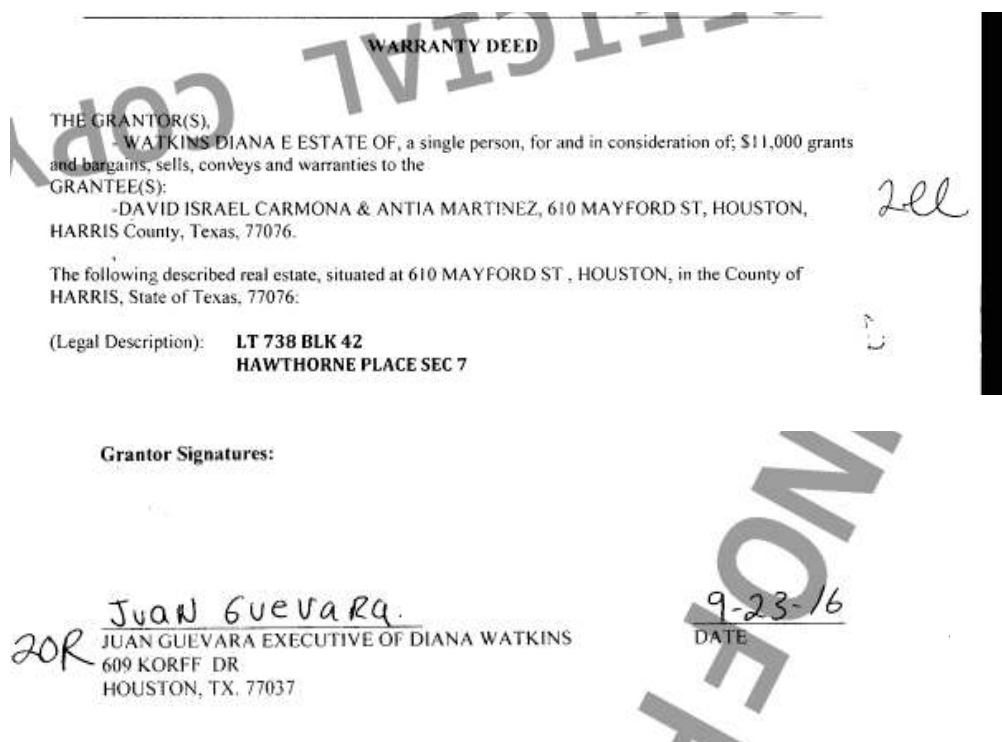
**i. 610 Mayford St, Houston, Texas 77076**

40. In 2015, Juan Guevara forged a warranty deed, which he had filed in the real property records, falsely claiming ownership of a property at 610 Mayford St, Houston, Texas 77076 (the 'Mayford property'). The deed purports to transfer title from the deceased legal owner Diana Watkins to Defendant Juan Guevara.

41. The legal owner Diana Watkins had died in 2009 and therefore could not have signed the deed dated April 6, 2015. Further, Michael Watkins, Diana Watkins's son and heir, was unaware of the transactions until after the deeds were filed. He does not know any of the parties to the deed transactions.

42. Twice, Defendant Juan Guevara deeded the Mayford property to Defendant Antia

Martinez and David Carmona. First, he executed a warranty deed purporting to transfer title from himself to Defendants Antia Martinez and David Carmona. The next year, they had Defendant Juan Guevara execute another warranty deed as “executive of Diana Watkins,” to make the transaction look legitimate. This representation was a blatant lie. Defendant Juan Guevara had no relationship with Diana Watkins and was not an executor or administrator of her estate.



43. In 2018, Defendants Antia Martinez and David Carmona executed a warranty deed purporting to transfer title to their relative Victor Hugo Carmona-Silva. They then had Maria Del Refugio Canchola Silva (another family member) present the deed to the Clerk’s office to be filed.

44. Now, because of the fraudulent conduct of Defendants Antia Martinez, David Carmona, and Juan Guevara, the heirs of Diana Watkins lack clear title, and Victor Hugo Carmona-Silva, who has no legitimate ownership interest, is reflected as having title to the Mayford property.

#### **D. Other Deed Forgery Committed by Juan Guevara**

45. The Mayford property was not the only property Defendant Juan Guevara attempted to steal through deed forgery. He also forged deeds transferring to himself properties at 601, 605, and 609 Korff Drive, Houston, Texas (the “601 Korff” and “605 and 609 Korff” properties, respectively).

##### **i. 605 and 609 Korff Dr, Houston, Texas 77037**

46. Sedric Willis was the legal owner of the 605 and 609 Korff properties. While he was experiencing financial troubles around 2013, he listed the properties for sale.

47. After seeing a for sale sign, Defendant Juan Guevara approached Sedric Willis and offered to buy the properties. Willis accepted his offer, and Defendant Juan Guevara had him execute a sale agreement. However, except for a deposit fee, Defendant Juan Guevara failed to pay Sedric Willis for the property.

48. Because of Defendant Juan Guevara’s failure to pay, Sedric Willis never signed a warranty deed to convey the 605 and 609 Korff properties to him. However, without Sedric Willis’s permission or knowledge, Defendant Juan Guevara attached a signature page from the sale agreement to a warranty deed (titled “Guarantee Deed”) purporting to transfer title to himself and Elsa Flores Aguilera. The fraudulent deed was filed in the real property records.

49. Defendant Juan Guevara did not retain his false ownership for long, as the properties were sold in tax foreclosure sales.

##### **ii. 601 Korff Dr, Houston, Texas 77037**

50. Sedric Willis co-owned with his brother Carl Willis another property at 601 Korff Drive.

51. Around the time of the sale agreement for the 605 and 609 Korff Properties,

Defendant Juan Guevara convinced Sedric Willis to allow him and his family to stay at the 601 Korff property in exchange for monthly rent. During his occupancy, he forged a warranty deed (titled “Guarantee Deed”) purporting to transfer title to the 601 Korff property from Carl and Sedric Willis to himself and his wife Elsa Flores Aguilera. The deed was recorded in the real property records.

52. Defendant Juan Guevara and his family continued to live on the property after the filing of the forged deed.

53. After Juan Guevara was indicted for theft of money and real property, Sedric Willis discovered the forged deed. In 2019, Sedric Willis drove to the jail where Defendant Juan Guevara was incarcerated, and he had Defendant Juan Guevara execute a general warranty deed transferring title back to him. Sedric Willis also had Elsa Flores Aguilera sign the deed.

54. Sedric Willis, feeling that Defendant Juan Guevara’s family were innocent victims of his criminality, was unwilling to evict them. In 2026, Sedric Willis sold the property to Elsa Flores as well as to Defendant Juan Guevara’s children, who continue to live on the property.

#### **E. List of Fraudulent Instruments Used by Defendants**

55. Listed below are forged and fraudulent real property instruments, mentioned earlier in this petition, that Defendants have made, presented, and used to falsely claim ownership of real properties.

##### **1. Real Property known as Lot 9, Block 8, Inwood Forest Village, commonly known as 3635 Red Fir Drive, Houston, Texas**

Title: Warranty Deed  
Grantor: Wilson Hamilton  
Grantee: F. Diaz Martinez  
Document Date: May 30, 2025 or June 6, 2025  
Recording Date: June 6, 2025  
Clerk File No.: RP-2025-218434

Notary: Manuel Giron  
Presented to the Clerk's Office by: Francisca Rodriguez

**2. Real Property known as Lot 109, Rosewood Estates, commonly known as 7222 Bywood Street, Houston, Texas**

Title: Warranty Deed  
Grantors: JB Brossie and Jimmie Brossie  
Grantee: Juakin Lozano  
Document Date: April 25, 2025  
Recording Date: August 8, 2025  
Clerk File No.: RP-2025-313304  
Notary: Xiomara Mendoza  
Presented to the Clerk's Office by: Francisca Rodriguez

**3. Real Property known as Lot 25, Block 6, Inwood Pines, Section 1, commonly known as 3819 Black Locust Drive, Houston, Texas**

Title: Warranty Deed  
Grantor: Curtis Carker  
Grantee: F. Martinez D.  
Document Date: September 2, 2025  
Recording Date: September 19, 2025  
Clerk File No.: RP-2025-374024  
Notary: Rodrigo Ortiz Martinez  
Presented to the Clerk's Office by: Francisca Rodriguez

**4. Real Property known as Lot 19, Block 16, East Sunnyside Court, Section 1, commonly known as 4510 Teton Street, Houston, Texas**

Title: Warranty Deed  
Grantor: Emily O. W. Wade  
Grantee: Joe Wade  
Document Date: July 30, 2022  
Recording Date: January 4, 2023  
Clerk File No.: RP-2023-4203  
Notary: Sadie Pearl Jackson  
Presented to the Clerk's Office by: Jorge Villatoro

Title: Warranty Deed  
Grantor: Joe Wade  
Grantee: Marcos Diaz R  
Document Date: June 27, 2023  
Recording Date: July 5, 2023  
Clerk File No.: RP-2023-249459

Notary: Suleyma Reyes  
Presented to the Clerk's Office by: David Garcia Garcia

Title: Warranty Deed  
Grantor: Marcos Diaz R  
Grantee: Antia Diaz Martinez  
Document Date: March 7, 2025  
Recording Date: March 11, 2025  
Clerk File No.: RP-2025-87227  
Presented to the Clerk's Office by: Antia Martinez

**5. Real Property known as Lot 738, Block 42, Hawthorne Place, Section 7, commonly known as 610 Mayford Street, Houston, Texas**

Title: Warranty Deed  
Grantor: Diana E. Watkins  
Grantee: Juan Guevara  
Document Date: April 6, 2015  
Recording Date: October 5, 2015  
Notary: Adelida C. Briones  
Clerk File No.: 20150453231

Title: Warranty Deed  
Grantor: Juan Guevara  
Grantees: David Israel Carmona and Antia Martinez  
Document Date: November 19, 2015  
Recording Date: November 23, 2015  
Notary: Adelida C. Briones  
Clerk File No. 20150530690

Title: Warranty Deed  
Grantor: Estate of Diana E Watkins (signed by Juan Guevara as "executive")  
Grantees: David Israel Carmona and Antia Martinez  
Document Date: September 23, 2016  
Recording Date: September 26, 2016  
Notary: Kenya Ramirez  
Clerk File No.: RP-2016-433926

Title: Warranty Deed  
Grantors: Anita Martinez and David Israel Carmona  
Grantee: Victor Hugo Carmona-Silva  
Document Date: November 17, 2018  
Recording Date: November 19, 2018  
Notary: Jorge Ramirez  
Presented to the Clerk's Office by: Maria Del Refugio Canchola Silva

Clerk File No.: RP-2018-522398

**6. Real Property known as Lots 25 and 26, Blue Bell Place, Section 1, commonly known as 605 and 609 Korff Drive, Houston, Texas**

Title: Warranty Deed  
Grantor: Sedric Willis  
Grantee: Juan Guevara and Elsa Flores  
Document Date: April 6, 2013  
Recording Date: May 15, 2013  
Notary: Claudia Laurencio  
Clerk File No.: 20130233276

**7. Real Property known as Lot 27, Blue Bell Place, Section 1, commonly known as 601 Korff Drive, Houston, Texas**

Title: Guarantee Deed (sic)  
Grantors: Carl E. Willis and Sedric J. Willis  
Grantee: Juan Guevara and Elsa Flores Aguilera  
Document Date: July 20, 2015  
Recording Date: August 28, 2015  
Notary: Adelida C. Briones  
Clerk File No.: 20150392579

**XI.**

**OTHER LAWSUITS INVOLVING DEFENDANTS**

**A. At least one suit to quiet title has been filed against Jorge Villatoro.**

**i. 3635 Ward St, Houston, Texas 77021**

56. Jorge Villatoro forged a deed (Clerk File #RP-2023-55058), purporting to transfer title to a property at 3635 Ward St, Houston, Texas 77021 from the legal owner Vivian Seals to himself. The deed is dated November 22, 2022 and was filed on February 17, 2023.

57. The heirs of Vivian Seals filed a suit to quiet title in June 2023 in Harris County (Cause No. 2023-35607). As Villatoro failed to file an answer, a default judgment against Villatoro was signed, and the title was quieted.

**B. At least one suit to quiet title has been filed against Antia Martinez.**

**i. 102 Tomlin Rd, Houston, Texas 77037)**

58. In 2015, a deed was filed with “E.S. Moore” as grantor and Antia Martinez as grantee (Clerk File #20150238309). Later that year, another deed was filed naming Antia Martinez as grantor and Amelia Martinez and Mario Cavazos as grantees (Clerk File #20150530692).

59. Eugene Stanley Moore and his wife Anita Moore were the legal owners of the property. Anita Moore filed a suit to quiet title in 2017. *Moore v. Martinez*, No. 201721456 (234th Dist. Ct., Harris County, Tex. June 13, 2019). In 2019, the court ordered that the title be quieted in Anita Moore and that possession of the property be immediately given to her. The documents purporting to transfer title to Antia Martinez, Amelia Martinez, and Mario Cavazos were declared of no force and effect. Further, the court ordered that those documents be stricken from the real property records.

**C. A criminal case was filed against Defendant Juan Guevara, accusing him of theft of real estate and money, which resulted in a felony conviction.**

60. In a criminal case filed in 2017, Juan Guevara was accused of stealing real property and money. *State v. Guevara*, No. 156850501010, (178th Dist. Ct., Harris County, Tex. July 6, 2018). The properties he was indicted for stealing included 610 Mayford St, Houston, Texas; 4620 Werner Street, Houston, Texas; 12013 Anchick Street, Houston, Texas; and 407 Cool Spring Drive, Houston Texas. The case was eventually dismissed and refiled.

61. In the refiled case, Juan Guevara was indicted for stealing the Werner St Property and the Anchick St Property, as well as a property not included in the previous indictment, located at 1735 Beaver Bend, Houston, Texas. *State v. Guevara*, No. 15929201010, (178th Dist. Ct, Harris County, Tex. Aug. 28, 2019). However, in the new indictment, Juan Guevara’s alleged theft of the Mayford Street property was not included.

62. In four out of the six properties Juan Guevara was accused of stealing in the original and refiled cases, he had fraudulent deeds filed in the real property records.

**i. 12013 Anchick Street, Houston, Texas 77076**

63. In 2015, a deed (Clerk File #20150459715) was filed in the real property records, purporting to transfer title to a property at 12013 Anchick Street, Houston, Texas 77076 from its legal owner Vondel Carnes to Amilcar Antonio Peraza and/or Ecriselda Benitez Peraza. The deed uses the notarization of Adelida C. Briones. In both the original criminal case and the refiled case, Juan Guevara was indicted for stealing the property from the heirs of Vondel Carnes as well as for stealing money from the Perazas.

**ii. 407 Cool Spring Drive, Houston, Texas 77037**

64. In 2016, a deed (Clerk File #RP-2016-372100) was filed in the property records, purporting to transfer title to a property at 407 Cool Spring, Houston, Texas 77037 from Juan Guevara to Luciano Estrada Robledo and Maria del Socorro Cruz Merla. In both the original and refiled cases, Juan Guevara was indicted for stealing the property from its legal owner and for stealing money from Merla and Robledo. As of the date of this filing, Cruz and Robledo are reflected as owners of the property even though they likely have no legitimate ownership interest, and the legal owner of the property lacks clear title.

**iii. 1735 Beaver Bend, Houston, Texas 77088**

65. In 2017, a deed (Clerk File #RP-2017-321966) was filed in the real property records, purporting to transfer title to a property at 1735 Beaver Bend, Houston, Texas 77088 from Juan Guevara to Herminio Ortuno-Bello and Juana Arana Gonzalez. In the refiled criminal case, Juan Guevara was indicted for stealing the property from its legal owner Richard Pickar and for stealing money from Ortuno-Bello and Gonzalez. After Juan Guevara was convicted, Ortuno-Bello

and Gonzales executed a quit claim deed transferring title back to Richard Pickar.

**iv. 610 Mayford Street, Houston, Texas 77076**

66. As described in the “Background” section of this petition, Juan Guevara forged deeds falsely purporting to transfer title from Diana Watkins, the legal owner of the property, to himself and sold it to David Carmona and Antia Martinez, who later transferred title to Victor Hugo Carmona. As Diana Watkins died in 2009, she could not have signed the deed, which purports to be executed in 2015. In the original criminal case (but not the refiled case) Juan Guevara was indicted for stealing the property and later convicted for felony theft. However, in the real property records, Victor Hugo Carmona Silva, who has no legitimate ownership interest, is still reflected as the owner of the property.

**D. Several instruments purporting to transfer property title to David Garcia Garcia have been declared fraudulent by a court order.**

**i. Lots 37 and 38, Block 23, Highland Heights, commonly referred to as 0 Knox Street**

67. On August 25, 2023, a deed (Clerk File #RP-2023-325883) was filed purporting to transfer title to a property known as Lots 37 and 38, Block 23, Highland Heights from Jarin A. Martinez to Micaela Moreno Hernandez and David Garcia Garcia. The deed purports to be executed August 24, 2023 and uses Lawrence L. Pope, Jr.’s notarization. Prior to this transaction, Jarin Martinez had filed an affidavit (Clerk File # RP-2023-314747) in the real property records, falsely claiming he owned the property.

68. On December 19, 2024, another deed (Clerk File #RP-2024-473376) was filed, purporting to transfer title to the property from a “Willie Johnson” to David Garcia Garcia. The deed purports to be executed December 18, 2024 and uses the notarization of Monica Gonzalez.

69. An order of final judgment in *State of Texas and Harris County, Texas v. Alba Martinez and Jarin Martinez* declared that the instruments filed by Jarin Martinez and David Garcia Garcia concerning this property constitute fraudulent claims made against the property and/or interests in the property and are null, void, of no legal effect, and do not reflect or convey any interest in or title to the Property. *State v. Martinez, No. 202525038*, (281st Dist. Ct, Harris County, Tex. July 30, 2025).

**ii. 6731 Knox Street, Houston, Texas 77091**

70. On December 2, 2022, a deed (Clerk File #RP-2022-571493) was filed purporting to transfer title to a property at 6731 Knox Street, Houston, TX 77091 from Katheryn Pickins to Alba Martinez. The deed purports to be executed September 13, 2022 and uses the notarization of Sadie Pearl Jackson.

71. On July 19, 2023, another deed (Clerk File #RP-2023-270786) was filed purporting to transfer title from Alba Martinez to David Garcia Garcia and Micaela Moreno Hernandez. The deed is dated July 19, 2023 and uses the notarization of Sadie Pearl Jackson.

72. An order of final judgment in *State of Texas and Harris County, Texas v. Alba Martinez and Jarin Martinez* declared that the instruments filed by Alba Martinez and David Garcia Garcia concerning this property constitute fraudulent claims made against the property and/or interests in the property and are null, void, of no legal effect, and do not reflect or convey any interest in or title to the Property. *Id.*

**XII.**  
**CAUSES OF ACTION**

**A. Count One: DTPA Violations**

i. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding

paragraph of this Petition.

- ii. As alleged and detailed in this Petition, Defendants have, in the course of trade and commerce, engaged in false, misleading, and deceptive acts and practices declared to be unlawful in DTPA subsections 17.46(a) and (b) and section 17.50, including, but not limited to:
  - a. Engaging in false, misleading, or deceptive acts and practices declared to be unlawful, in violation of DTPA §17.46(a);
  - b. Causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services, in violation of DTPA § 17.46(b)(2);
  - c. Representing that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law, in violation of DTPA § 17.46(b)(12) and Texas Property Code § 53.260; and
  - d. Engaging in an unconscionable action or course of action, in violation of the DTPA § 17.50(a)(3).

**B. Count two: Recording of Fraudulent Lien**

- iii. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this Petition.
- iv. Defendants as alleged and detailed in this Petition, knowingly made, presented, or used a fraudulent lien or claim against real or personal property or an interest in real or personal property, in violation of Texas Civil Practice and Remedies Code section 12.002.
- v. Defendants made, presented, or used the above-described record with the intent that said record be given the same legal effect as a valid lien or claim against real or personal property or an interest in real or personal property, and with the intent to cause another

person physical injury, financial injury, or mental anguish or emotional distress.

**XIII.**  
**TRIAL BY JURY**

- vi. Plaintiffs herein request a jury trial and tender the jury fee to the Harris County District Clerk's Office pursuant to Texas Rule of Civil Procedure 216.

**XIV.**  
**APPLICATION FOR PERMANENT INJUNCTION**

- vii. Plaintiffs incorporate and adopt by reference the allegations in each and every preceding paragraph of this Petition.
- viii. Plaintiffs' application for permanent injunction is authorized by DTPA section 17.47 and Texas Civil Practice and Remedies Code section 12.003. Plaintiffs have reason to believe that Defendants are engaging in, have engaged in, and/or are about to engage in, acts and practices declared to be unlawful under the DTPA and Civil Practice and Remedies Code chapter 12. Plaintiffs further plead that these proceedings are in the public interest.
- ix. Plaintiffs request the Court grant a permanent injunction enjoining Defendants and their officers, agents, servants, employees, attorneys, and any other person or entity in active concert or participation with them—whether acting directly or through any corporation, company, partnership, trust, entity, subsidiary, division, or other device—from the following:
- a. Representing to any person that Defendant or any other person has an ownership interest in real property in which Defendant or the person does not have an ownership interest;
  - b. Executing, agreeing to execute, attempting to execute, or taking any action in furtherance of executing any document or instrument including, but not limited

to, any deed, that claims or purports to show an interest in property that Defendant does not own, other than executing an instrument transferring or returning title to property fraudulently or wrongfully obtained or claimed by Defendant to the lawful owner of said property or withdrawing an unlawful ownership interest in real property;

- c. Recording, agreeing to record, attempting to record, or taking any action in furtherance of recording with the Harris County Clerk's Office any real property instrument, including, but not limited to, any deed, that claims or purports to show an interest in property that Defendant or any other person or entity does not own, other than recording an instrument transferring or returning title to property fraudulently or wrongfully obtained or claimed by Defendant to the lawful owner of said property or withdrawing an unlawful ownership interest in real property;
- d. Transferring or selling, agreeing to transfer or sell, attempting to transfer or sell, or taking any action in furtherance of transferring or selling any interest in any real property that Defendants or their agents, representatives, employees, or any other person or entity in active concert or participation with them are purported to own but do not own, included, but not limited to, entering into any agreement to sell real property, advertising the sale of any real property, or communicating to any third party that Defendant will or may transfer Defendant's ownership interest in the property, regardless of whether the transfer is for consideration, other than transferring or returning title to property fraudulently or wrongfully obtained or claimed by Defendant to the lawful owner of said property or

- withdrawing an unlawful ownership interest in real property;
- e. Engaging in false, misleading, or deceptive acts and practices declared to be unlawful;
  - f. Causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services;
  - g. Advertising goods or services with the intent not to sell them as advertised;
  - h. Representing that an agreement confers or involves rights, remedies, or obligations which it does not have or involve, or which are prohibited by law; and
  - i. Failing to disclose information concerning goods or services which was known at the time of the transaction with the intent to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed.

## **XV.**

### **WRIT TO ISSUE WITHOUT BOND**

- x. Plaintiffs request that the Clerk of the Court issue such Writs of Injunction pursuant to any Injunction issued by this Court in conformity with the law, and that the same be issued and be effective without the execution and filing of a bond as Plaintiffs are exempt from such bonds under DTPA subsection 17.47(b).

## **XVI.**

### **CONDITIONS PRECEDENT**

- xi. All conditions precedent to Plaintiffs' claims for relief have been performed or have occurred.

- xii. WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this Court:
- a. Cite Defendants according to the law to appear and answer herein;
  - b. Grant a permanent injunction restraining Defendants and their officers, agents, servants, employees, attorneys, and any other person or entity in active concert or participation with them, as requested in Plaintiffs' Application for Permanent Injunction;
  - c. Void forged real property records and fraudulent title transfers;
  - d. Order Defendants to transfer title back to any property owner whose property has not been conveyed to a third party in a good faith transaction;
  - e. Order Defendants to pay civil penalties of up to \$10,000.00 per violation of the DTPA and civil penalties of up to \$250,000.00 per violation of the DTPA, when the act or practice acquired or deprived money or property from a consumer who was 65 years of age or older when the act or practice occurred;
  - f. Order Defendants to pay money damages and restitution of money or property acquired by means of an unlawful act or practice under the DTPA;
  - g. Order Defendants pay injured persons exemplary damages in an amount determined by the Court, in accordance with Civil Practice and Remedies Code subsection 12.002(b)(4);
  - h. Award Plaintiffs all costs of bringing the action, including all court costs, attorney's fees, and related expenses, such as investigative expenses, as provided by Civil Practice and Remedies Code section 12.006;
  - i. Award-judgment and post-judgment interest on all awards of damages or penalties, as provided by law;
  - j. Decree that all of Defendants' penalties are not dischargeable in bankruptcy to the maximum extent permitted by 11 U.S.C. § 523 and/or any other applicable law; and

- k. Award Plaintiffs any such other and further relief to which they are justly entitled.

Respectfully submitted,

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*/s/ Allison Lee* \_\_\_\_\_

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**ATTORNEYS FOR PLAINTIFFS THE STATE  
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### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Erin Robinson on behalf of Allison Lee

Bar No. 24150649

Erin.Robinson@harriscountytexas.gov

Envelope ID: 118475520

Filing Code Description: Petition

Filing Description: Plaintiffs' Original Petition and Application for Permanent Injunction

Status as of 8/11/2026 2:06 PM CST

#### Case Contacts

| Name        | BarNumber | Email                             | TimestampSubmitted    | Status   |
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| Allison Lee |           | Allison.Lee@harriscountytexas.gov | 8/11/2026 12:43:09 PM | NOT SENT |