

CAUSE NO. 2026-70357

622 SOFI LAKES, LP,	§	IN THE DISTRICT COURT OF
GO-M REALTY LLC, and	§	
DAMAC INVESTMENTS LLC,	§	
Plaintiffs/Counter-Defendants,	§	
	§	
v.	§	
	§	
JONATHAN GARCIA,	§	
Defendant/Counter-Plaintiff/	§	
Third-Party Plaintiff,	§	HARRIS COUNTY, TEXAS
	§	
v.	§	
	§	
SOPHIA FILFIL, et al.,	§	
including ZACHARY PETERS,	§	
ZAZA LANDSCAPE,	§	
MARTIN FILFIL, and	§	
MICHAEL LLOYD,	§	515TH JUDICIAL DISTRICT
Third-Party Defendants.	§	

**JONATHAN GARCIA’S VERIFIED APPLICATION FOR TEMPORARY
INJUNCTION, ACCOUNTING, AND PRESERVATION OF RECORDS CONCERNING
SOFI LAKES FUNDS**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant, Counter-Plaintiff, and Third-Party Plaintiff Jonathan Garcia (“Garcia”), appearing pro se, applies for a temporary injunction, after notice and hearing, requiring disclosure and preservation of, and restraining undisclosed, payments of Sofi Lakes project funds to companies and persons connected to Sophia Filfil, until final judgment or further order of the Court. Garcia asks that this application be heard with his application for temporary injunction (Filing 66). In support, Garcia shows:

I. FACTS

1. Ms. Filfil promised Garcia an equity position in her development company, which develops Sofi Lakes, and later promised him equity in specific projects, including Sofi Lakes.

(Answer ¶¶ 5B(g), 17; Answer Exh. 17.) Garcia worked on the Sofi Lakes development for approximately four years. Sofi Lakes development costs are to be reimbursed through public improvement or municipal utility district bonds.

2. In an in-person conversation before this suit was filed, Ms. Filfil told Garcia that she could not put her own name on Zaza Landscape, a landscaping company of her husband, Martin Filfil, and that she would use it to make money from the Sofi Lakes project. She had asked Garcia in 2024 to prepare a pitch deck for a “landscape and design company”; she told him on August 2, 2025, “I am doing the landscaping work” at Sofi Lakes; and on August 7, 2026 she referred to a landscape trade-show booth “For Zaza landscape.” Mr. Filfil shared Sofi Lakes project files with Garcia from July through September 2026. (Exhibit A.)

3. Zaza’s website, captured October 5, 2026, states that it was “established in 2024” in Houston, serves “Developers” and “Builders,” and lists its team as Martin Filfil, Chief Operating Officer; Michael Lloyd, Chief Financial Officer; and “Zack Peters,” Chief Operating Officer — the same Zachary Peters who is the broker of Ms. Filfil’s brokerage, Yaalx Realty Group, LLC. (Exhibit B.)

4. On information and belief, Ms. Filfil controls Zaza Landscape through her husband and Mr. Peters, and the arrangement routes Sofi Lakes funds — including costs to be reimbursed with district bond proceeds — to her indirectly, diminishing the value of the Sofi Lakes interest she promised Garcia.

II. GROUNDS

5. A temporary injunction preserves the status quo pending trial where the applicant pleads a cause of action, shows a probable right to relief, and shows a probable, imminent, and irreparable injury. *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002). Garcia’s live claims include breach of fiduciary duty, fraud, and unjust enrichment, and request an accounting and a constructive trust over Sofi Lakes funds diverted to Zaza Landscape, Martin Filfil, and Michael Lloyd. (Answer, Counts 4, 6, and 12.) Once diverted funds are spent or commingled, they cannot be traced or recovered, and records of related-party payments are in the exclusive control of Ms. Filfil and her companies. The relief requested is modest: it requires disclosure and

preservation and restrains only undisclosed related-party payments, and does not interfere with the ordinary development of Sofi Lakes.

III. RELIEF REQUESTED

Garcia asks that, after hearing, the Court order, until final judgment or further order of the Court, that:

(a) Sophia Filfil, 622 Sofi Lakes, LP, GO-M Realty LLC, Zaza Landscape, Martin Filfil, Michael Lloyd, and Zachary Peters preserve all documents relating to Sofi Lakes contracts, invoices, payments, and district bond reimbursement requests, and all records of Zaza Landscape;

(b) within fourteen days, Ms. Filfil and 622 Sofi Lakes, LP file an accounting of all payments made since January 1, 2025, from Sofi Lakes funds or district reimbursements, to Zaza Landscape, Martin Filfil, Michael Lloyd, Zachary Peters, or any entity owned or controlled by Ms. Filfil, a member of her family, or Mr. Peters; and

(c) no such payment be made without first filing with the Court a disclosure of the payee, amount, and purpose.

Garcia asks that bond be set at \$100, because the relief requires disclosure and preservation and does not stop the project. Tex. R. Civ. P. 684.

IV. PRAYER

Garcia respectfully asks the Court to set this application for hearing with Filing 66, grant the temporary injunction described in Part III, and grant all other relief to which he is entitled.

Respectfully submitted,

/s/ Jonathan Garcia

JONATHAN GARCIA, pro se

[REDACTED]

[REDACTED]

Tel. [REDACTED]

Jon.garcia.a@gmail.com

DEFENDANT/COUNTER-PLAINTIFF/
THIRD-PARTY PLAINTIFF

VERIFICATION — UNSWORN DECLARATION

My name is Jonathan Garcia, my [REDACTED]
[REDACTED]

under penalty of perjury that the facts stated in paragraphs 1 through 4 of this application are within my personal knowledge or are shown by the exhibits cited, except those stated on information and belief, which I believe to be true. Exhibit A is a true and correct reproduction of iMessages between Sophia Filfil and me, exported from my iPhone using iMazing, and a summary of Google Drive sharing notices I received from Martin Filfil. Exhibit B is a true and correct reproduction of the text of zazalandscapes.com/about as it appeared on October 5, 2026, with screen captures I took that morning. Tex. Civ. Prac. & Rem. Code § 132.001.

Executed in Orange County, State of Florida, on the 5th day of October, 2026.

/s/ Jonathan Garcia
Jonathan Garcia, Declarant

CERTIFICATE OF CONFERENCE

On October 5, 2026, Garcia emailed this application to counsel for Plaintiffs and Ms. Filfil, Connor J. Smith, asking whether they oppose it. Counsel had not agreed to the relief before filing.

CERTIFICATE OF SERVICE

I certify that on October 5, 2026, a true and correct copy of this application was served under Texas Rule of Civil Procedure 21a on Connor J. Smith, Doré Rothberg Law, P.C., csmith@dorelaw.com, through the electronic filing manager and by email. Third-party defendants not yet served will be served with citation.

/s/ Jonathan Garcia
Jonathan Garcia

INDEX OF EXHIBITS

Exhibit A — Zaza Landscape and Martin Filfil: iMessages (2024–2026) and Google Drive sharing notices

Exhibit B — zazalandscape.com “About us” page, captured October 5, 2026 (Martin Filfil, Michael Lloyd, Zack Peters)

Garcia also relies on Exhibits 1–37 to his Original Answer, Counterclaims, and Third-Party Petition.

EXHIBIT A

Zaza Landscape and Martin Filfil — iMessages and Google Drive notices

iMessage text is reproduced verbatim from the iMazing export of the conversation “Sophia Hotel,” arranged in iMessage layout. Gray bubbles are Ms. Filfil; blue bubbles are Mr. Garcia. Drive-sharing notices are summarized from emails in Mr. Garcia’s account.

Sophia Hotel (Sophia Filfil)
iMessage · [REDACTED]

May 1, 2024

Hi

Filfil · 5/1/24 10:31 PM EDT · Export p. 1357

Can u do a quick pitch deck on landscape and design company

Filfil · 5/1/24 10:32 PM EDT · Export p. 1357

August 2, 2025 — Sofi Lakes

I have a lot Of Work

Filfil · 8/2/25 1:14 PM EDT · Export p. 1817

Working to get things done Left and right

Filfil · 8/2/25 1:14 PM EDT · Export p. 1817

I spoke to all builders to Send ACRs

Filfil · 8/2/25 1:15 PM EDT · Export p. 1818

Chesmar in two week MHi Monday David weekly this week Lennar soon Taylor soon Westin done

Filfil · 8/2/25 1:15 PM EDT · Export p. 1818

I am doing the landscaping work

Filfil · 8/2/25 1:16 PM EDT · Export p. 1818

August 7, 2026

[https://www.facebook.com/events/s/29th-annual-woodlands- landscap/990914050419036/](https://www.facebook.com/events/s/29th-annual-woodlands-landscap/990914050419036/)

Garcia · 8/7/26 1:41 PM EDT · Export p. 2774

I will attend

Filfil · 8/7/26 1:51 PM EDT · Export p. 2774

We can setup booth

Garcia · 8/7/26 1:51 PM EDT · Export p. 2774

Ok

Filfil · 8/7/26 1:52 PM EDT · Export p. 2775

U coming

Filfil · 8/7/26 1:52 PM EDT · Export p. 2775

For Zaza landscape

Filfil · 8/7/26 1:52 PM EDT · Export p. 2775

Emails from Martin Filfil (mfilfil76@gmail.com) sharing Sofi Lakes project files with Garcia

Jul. 18, 2026 — “0717 (1)(1).mov”; Jul. 26, 2026 — “317627126_100DRONE_NORM0024.MP4” and “copy_D3143CEE...mov”; Aug. 10, 2026 — “copy_2085DD28...MOV”; Aug. 14, 2026 — “167535987_100DRONE_NORM0016.MP4” and “1952432335_100DRONE_NORM0020.MP4”; Sept. 7, 2026 — shared folder “sofi.” (Google Drive sharing notices received at jongarciaa@gmail.com.)

EXHIBIT B

zazalandscape.com — “About us – ZAZA” page, captured October 5, 2026

Text captured from <https://zazalandscape.com/about/> on October 5, 2026 by Mr. Garcia using his Chrome browser; reproduced verbatim (headshot photographs omitted). The site’s header lists telephone [REDACTED] and sales@zazalandscape.com. Highlighting added by Mr. Garcia. Mr. Garcia’s four screen captures of the page follow.

URL: <https://zazalandscape.com/about/> · **Title:** About us – ZAZA

Who we are?

“ZAZA Landscape & Design is your one-stop solution for all things landscape and design. ... We specialize in transforming outdoor spaces into luxurious, functional environments tailored to the unique needs of our clients.”

ZAZA is a company that simplifies your landscape desire and helps to build your dream garden fast, efficient, effective and for all customers, Homeowners, **Developers of every property Builders.**

Since 2024! — **ZAZA, established in 2024, is an American landscape company based in Houston City.**

History — “While ZAZA is a new entity, our team brings decades of experience in the industry, blending innovative solutions with market needs.”

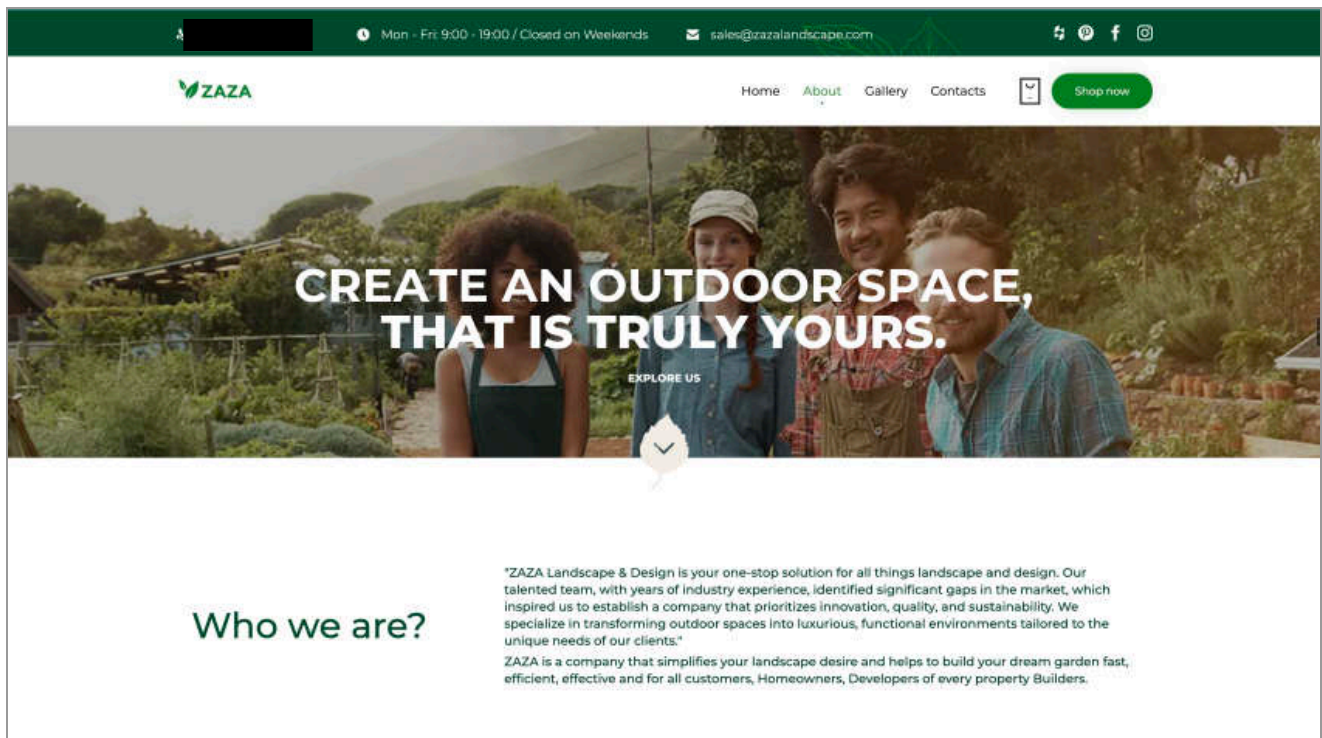
Meet the Team

MARTIN FILFIL — Chief Operating Officer — martin@zazalandscape.com

MICHAEL LLOYD — Chief Financial Officer — mark@zazalandscape.com

ZACK PETERS — Chief Operating Officer — zach@zazalandscape.com

Exhibit B — screen capture 1 of 4: top of page — phone [REDACTED], sales@zazalandscape.com, “Who we are?”
zazalandscape.com/about — October 5, 2026, 9:37:45 a.m.



Meet the Team

Our team of skilled professionals includes landscape architects, horticulturists, and project managers, each bringing extensive knowledge and creativity to every project.



MARTIN FILFIL

Chief Operating Officer

martin@zazalandscape.com

"Our mission is to create beautiful, sustainable outdoor spaces that enhance quality of life."

Exhibit B — screen capture 3 of 4: Michael Lloyd, Chief Financial Officer
zazalandscape.com/about — October 5, 2026, 9:37:08 a.m.



MICHAEL LLOYD

Chief Financial Officer

mark@zazalandscape.com

"Our goal is to design stunning, eco-friendly outdoor environments
that improve everyday living."

ZACK PETERS

Exhibit B — screen capture 4 of 4: Zack Peters, Chief Operating Officer
zazalandscape.com/about — October 5, 2026, 9:37:18 a.m.



ZACK PETERS

Chief Operating Officer

zach@zazalandscape.com

"We aim to create beautiful, sustainable
outdoor spaces that promote a better quality of life."