

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ♦ South Orange, NJ 07079-0978  
Residence—NO MAIL: 541 Scotland Rd ♦ South Orange, NJ 07079-3009

MOTION FOR PROOF HEARING  
Superior Court of New Jersey DOCKET NO. ESSEX-L-004753-13  
Page 1 of 126

February 20, 2015

Superior Court of New Jersey  
Essex Vicinage – Finance Division  
Civil Central Processing Unit  
Room 131 Veterans Courthouse  
50 West Market Street  
Newark, NJ 07102

Attn: Judge Carey

Subject: Motion for Proof Hearing, Case Docket ESSX L – 004753-13

Dear Judge Carey,

This is my Motion for Proof Hearing for Case Docket No. Essex-L-004753-13.

My initial motion was submitted to Judge Stephanie Ann Mitterhoff, Michelle M. Smith, Esq., Clerk, Office of the Superior Court Clerk and the defendants' attorney, Stewart Seiden. As directed by the Court staff, I have added the following forms to this motion:

- Filing Fee Waiver Request Pages 2 – 5
- Return of Documentation form Page 6
- Form A: Court Dates & Discovery End Date & Certification Regarding Attempts to Resolve Page 8
- Form B: Civil Action, Certification In Support of Motion Pages 10 – 13
- Form B: Certification of Service Pages 14 – 15
- Form C: Civil Action Order Page 16

A copy of these added documents will be sent to Mr. Seiden via Federal Express Tracking No. 772960890568. As instructed by the Court, a self-addressed, stamped envelope is enclosed with this submission of the Motion to the Superior Court of New Jersey.

I shall continue to represent myself and also continue to search for an attorney that I can afford. I can be reached at:

Mail: P.O. Box  
South Orange, NJ 07079-0978

Phone: 202-486-4565

To receive a digital copy of this Motion for Proof Hearing and the Discovery document submitted to the Court for this case, simply send an email to [BankFraud@FinFix.org](mailto:BankFraud@FinFix.org) and you will receive an email with links to condensed and full copies of each document.

Sincerely,

Veronica Williams  
Plaintiff & Owner of 541 Scotland Road since 1983

cc: Michelle M. Smith, Esq., Clerk, Office of the Superior Court Clerk Pages 1, 7-16  
cc: S. Seiden, Duane Morris LLP, Pages 1, 7-16

Superior Court of New Jersey – Essex Vicinage – Finance Division  
Civil Central Processing Unit – Room 131 Veterans Courthouse  
50 West Market Street, Newark, NJ 07102

RETURN OF DOCUMENTS

Law Division

Date: 2-12-15	Docket: L-4753-13
Plaintiff: Williams	Defendant: Litten Loan Servicing

Please be advised that the enclosed document has NOT been filed and is being returned for the following reason(s)

New Civil Case Information Statement (CIS) is not attached as per Rule 1:5-6(c).

Filing fee not attached. 50.00

Filing fee insufficient. Filing fee of \$ \_\_\_\_\_ is required for this document type.

Restoration (sanction) fee is not required until order is signed. Return signed order.

Case is closed by initiated court order Rule 1:13-7(a) on \_\_\_\_\_.

Filed out of time. Formal motion required. Expired date \_\_\_\_\_.

Original signature needed on document.

Original signature needed on check.

Original signature needed on CIS form.

Not venued in Essex County.

Case has been transferred on \_\_\_\_\_.

Case in default on \_\_\_\_\_.

Document already filed.

Trial De Novo form required (form attached).

Make check payable to: Treasurer, State of New Jersey.

Other: Please Complete the forms to file a motion for Proof Hearing

NOTE: If document is retransmitted together with the CIS or the filing fee as appropriate within ten business days, after the receipt date stamped thereon, filing will be deemed to have been made on said date. Rule 1:5-6(c).

EXCLUDING MOTIONS

Returned by JD

Phone # (973) 693-~~6596~~ 6596

PLEASE RETURN ALL DOCUMENTS.

## MOTION FOR PROOF HEARING

Veronica Ann Williams	SUPERIOR COURT OF NEW JERSEY LAW DIVISION	
<u>Your Name</u>	<u>Essex</u> County	
541 Scotland Road	Docket Number	<u>ESSX_L - 004753-13</u>
<u>Street Address</u>		
South Orange, NJ 07079		
<u>Town, State, Zip Code</u>		
202-486-4565		
<u>Telephone Number</u>		
Veronica Williams	CIVIL ACTION Notice of Motion	
<u>Plaintiff vs.</u>		
Litton Loan Servicing, HSBC Bank USA, N.A., Fremont Home Loan		
<u>Defendants</u>		
Trust 2006-C Mortgage-Backed Certificates, Series 2006-C, Goldman Sachs, Ocwen, Stern & Eisenberg, PC, Powers Kim, LLC		

TO:

Take Notice that the undersigned will apply to the above named Court located at 50

West Market Street, Newark, NJ 07102 on \_\_\_\_\_ at 9:00 a.m. for an Order to:

Hold a Proof Hearing to determine damages for Default Judgment awarded on Nov. 17, 2014.

I will rely on witness testimony and the attached certification which contains the grounds for the relief sought.

Pursuant to R. 1:6-2(d), the undersigned: **(check one)**

- Waives oral argument and consents to disposition on the papers.
- Requests oral argument if this matter is contested.
- Requests oral argument for the following reasons

A proposed form of Order is attached.

FORMA

### COURT DATES

No pre-trial conference, arbitration proceeding, calendar call or trial date has been set except as follows:  
(If any dates have been scheduled, note them here; otherwise state "none")

### DISCOVERY END DATE

Check one

- Discovery in this matter is was completed on November 27, 2014
- A discovery end date has not been assigned to this matter.

### CERTIFICATION REGARDING ATTEMPTS TO RESOLVE (Required for discovery and calendar motions -check one)

- I certify that I have personally discussed this matter with the attorney for the opposing party, or the opposing party if appearing pro se, in order to resolve the issues raised by this motion. This effort was not successful.
- I certify that I have made a good faith effort to personally discuss this matter with the attorney for the opposing party, or with the party if appearing *pro se*, in order to resolve the issues raised by this motion. The effort I made included the following action: (specify attempts to confer):
- I certify that I have advised the attorney for the opposing party, or the party if appearing pro se, by letter that if I will make this motion if she/he continues to fail to comply with my discovery request.
- I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Date: Feb. 20, 2015

\_\_\_\_\_  
Signature:

Veronica Ann Williams

(print or type your name)

If this is the first paper you are filing in this case, you must sign the following certification. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-1(b).

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature:

(print or type your name)



**THIS PAGE  
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FORM B

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION

Veronica Ann Williams

Your Name

541 Scotland Road

Street Address

South Orange, NJ 07079-3009

Town, State, Zip Code

973-715-8580

Telephone Number

Veronica Ann Williams

Plaintiff  
vs.

Essex County

Docket Number ESSX L – 004753-13

CIVIL ACTION

*Certification in Support of Motion*

Litton Loan Servicing, HSBC Bank USA,, N.A., Fremont Home Loan

Defendants

Trust 2006-C Mortgage-Backed Certificates, Series 2006-C,  
Goldman Sachs, Ocwen, Stern & Eisenberg, PC, Powers Kirn, LLC

*I, Veronica Ann Williams*

am the



plaintiff



defendant

in the above-captioned matter. I make this certification in support of my motion to (state what you want the court to do)

Hold a Proof Hearing with a jury to determine damages for the Default Judgment awarded on Nov. 17, 2014. I will rely on witness testimony and the attached certification which contains the grounds for the relief sought.

*This motion should be granted because:*

(State the basis for your motion and why it should be granted. Use extra paper if necessary.)

**FULL TEXT AND ATTACHMENTS ON THE PAGES IMMEDIATELY FOLLOWING THIS PAGE**

Have I made attempts to resolve this dispute? Indeed, I have tried long and hard enough. I first tried to get the defendants to honor their commitment in 2009. After many, many phone calls, letters and facsimiles with no attempt by the defendants to rectify their errors, I filed a legal complaint in 2010. After the defendants' attorneys nullified the complaint on a technicality, I tried again to reason with the defendants. After the stress of the defendants' actions caused me to be hospitalized 3 times (2012-2013), I retained a lawyer to represent me (2013). After the 6 law firms representing the defendants milked my support resources with damaging and unresponsive legal activity (2010-2015), I met with the lawyer who had been charged with representing all defendants. His offer was totally unreasonable and insulting for it was less than one thousandth of a percent (0.001%) of what had been awarded to other plaintiffs who suffered far less than I. Moreover, it expected me to pay money to which the defendants were not entitled. After presenting an invalid form that I received from the defendants' attorney ([Discovery Exhibit 53](#) – attached) when I appeared on our assigned court date Nov. 17, 2014, I was issued a default judgment. 5 years is long enough. The defendants have had more than ample opportunity to seek a resolution in good faith. The stress of their actions persists (see attachment). I am exercising my right to have a jury of my peers determine the amount I am to be awarded. The defendants have failed to respond to correspondence sent since 2009 including a copy of this motion sent to their attorney.

*I certify that the above statements made by me are true and that if any of the statements are willfully false, I am subject to punishment.*

Date: Feb. 19, 2015

Signature:

Veronica Ann Williams

(print or type your name)

## DUPLICATE OF PREVIOUS PAGE WITH ATTACHMENTS

*This motion should be granted because:*

Have I made attempts to resolve this dispute? Indeed, I have tried long and hard enough. I first tried to get the defendants to honor their commitment in 2009. After many, many phone calls, letters and facsimiles with no attempt by the defendants to rectify their errors, I filed a legal complaint in 2010. After the defendants' attorneys nullified the complaint on a technicality, I tried again to reason with the defendants. After the stress of the defendants' actions caused me to be hospitalized 3 times (2012-2013), I retained a lawyer to represent me (2013). After the 6 law firms representing the defendants milked my support resources with damaging and unresponsive legal activity (2010-2015), I met with the lawyer who had been charged with representing all defendants. His offer was totally unreasonable and insulting for it was less than one hundredth of a percent \$20,000 of \$20,000,000 (0.001%) of what had been awarded to other plaintiffs who suffered far less than I. Moreover, it expected me to pay money to which the defendants were not entitled. After presenting an invalid form that I received from the defendants' attorney ([Discovery Exhibit 53](#) – attached) when I appeared on our assigned court date Nov. 17, 2014, I was issued a default judgment.

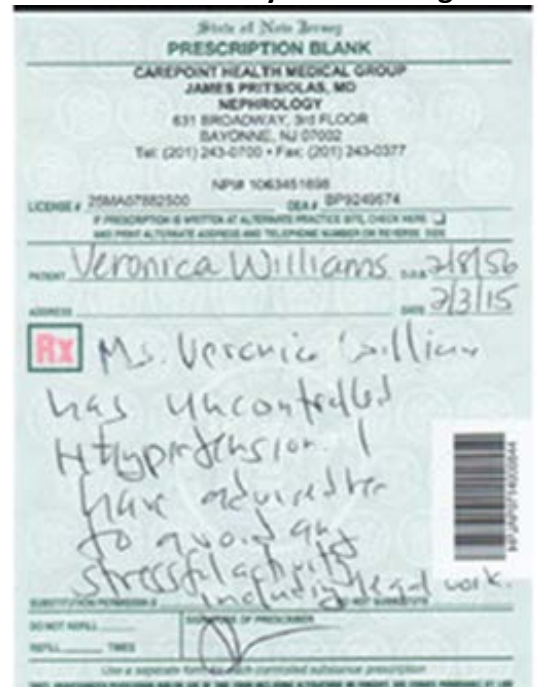
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### STRESS IMPOSED BY DEFENDANTS' – GLIMPSE OF RECENT IMPACT

The full impact will be presented by witnesses who have agreed to appear on my behalf.

2010 – 2012	BP	Defendants refuse to provide transaction history or fix mortgage errors. BP increases Hospitalized 3 times in 2012
4-25-13		Retained Denbeaux & Denbeaux
after 2013		BP normalizes
8-26-14		Realized Mediation Not Scheduled as Expected
9-19-14	130/80	Kessler
Sept – October	BP increases	Trial delayed to Jan. 15, 2015 without mediation; Denbeaux begins to pull out
9-22-14	152/90	Kessler
9-26-14	148/98	Kessler
10-4-14	HIGH	Dr. Sangosse
10-8-14	150/98	Kessler
10-15-14	158/88	Kessler
10-17-14	158/86	Kessler
10-21-14	HIGH	Dr. Pritsiolis
10-22-14	150/90	Kessler
10-24-14	148/88	Kessler
10-27-14	168/98	Kessler
11-8-14		Denbeaux withdrew
11-17-14		VW in court
11-21-14	136/76	Kessler
12-5-14		Judge Mitterhoff would not speak with me
Dec.	3 calls	Judge Mitterhoff would not speak with me
12-16-14	HIGH	Dr. Sangosse
12-17-14	160/100	Kessler
12-22-14	178/110	Kessler
1-12-15	150/96	Kessler
1-21-15	148/100	Kessler
2-3-15	170/100	Dr. Pritsiolis

### Doctor Restricts My Work on Legal Case



DISCOVERY EXHIBIT 53

Rec'd 10/23/14

Adam Deutsch, Esq. 016542010  
Denbeaux & Denbeaux  
366 Kinderkamack Road  
Westwood, New Jersey 07675  
(201) 664-8855 / Fax: (201) 666-8589  
*Counsel for Plaintiff Veronica Williams*

SUPERIOR COURT OF NJ  
CIVIL DIVISION  
ESSEX VICIAGE  
2014 OCT 14 A 10:38  
FINANCE DIVISION  
RECEIVED/FILED  
29

VERONICA WILLIAMS,  
  
Plaintiff  
  
v.  
  
LITTON LOAN SERVICING, HSBC BANK  
USA, N.A., FREEMONT HOME LOAN TRUST  
2006-C MORTGAGE-BACKED  
CERTIFICATES, SERIES 2006-C; GOLDMAN  
SACHS; OCWEN, Stern & Eisenberg, PC, Powers  
Kim LLC,  
  
Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY

DOCKET No.: ESX-L-4753-13

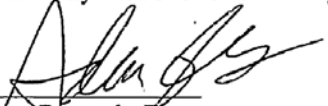
**STIPULATION EXTENDING DISCOVERY  
AND ADJOURNING THE TRIAL**

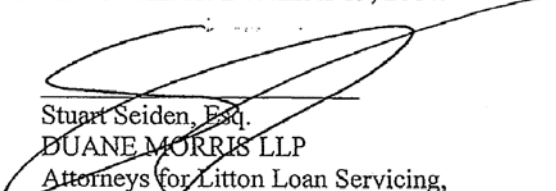
Counsel for remaining parties, having first conferred with the Office of the Clerk of Essex

County Superior Court, hereby agree and enter into this **STIPULATION AGREEMENT** as

follows:

1. The Trial presently scheduled for November 17, 2014 is hereby adjourned to January 15, 2015.
2. Discovery is hereby re-opened and shall continue until November 1, 2014.
3. Any motions for summary judgment shall be filed returnable December 19, 2014.

  
Adam Deutsch, Esq.  
DENBEAUX & DENBEAUX  
Attorneys for Plaintiff Veronica Williams

  
Stuart Seiden, Esq.  
DUANE MORRIS LLP  
Attorneys for Litton Loan Servicing,  
Goldman Sachs, HSBC Bank USA, N.A.,  
Freemont Home Loan Trust 2006-C  
Mortgage Backed Certificates Series 2006-  
C, and Ocwen Loan Servicing, LLC

**DISCOVERY EXHIBIT 53 cont'd.**

Adam Deutsch, Esq. 016542010  
Denbeaux & Denbeaux  
366 Kinderkamack Road  
Westwood, New Jersey 07675  
(201) 664-8855 / Fax: (201) 666-8589  
*Counsel for Plaintiff Veronica Williams*

VERONICA WILLIAMS,

Plaintiff

v.

LITTON LOAN SERVICING, HSBC BANK  
USA, N.A., FREEMONT HOME LOAN TRUST  
2006-C MORTGAGE-BACKED  
CERTIFICATES, SERIES 2006-C; GOLDMAN  
SACHS; OCWEN, Stern & Eisenberg, PC, Powers  
Kim LLC,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY

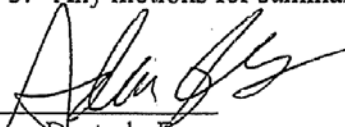
DOCKET No.: ESX-L-4753-13

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Adam Deutsch, Esq.  
DENBEAUX & DENBEAUX  
Attorneys for Plaintiff Veronica Williams

  
Stuart Seiden, Esq.  
DUANE MORRIS LLP  
Attorneys for Litton Loan Servicing,  
Goldman Sachs, HSBC Bank USA, N.A.,  
Freemont Home Loan Trust 2006-C  
Mortgage Backed Certificates Series 2006-  
C, and Ocwen Loan Servicing, LLC

FORM B

**CERTIFICATION OF SERVICE**

I certify that on Feb. 20, 2015 sent a copy of the Notice of Motion, Certification, and proposed form of Order to the following parties by to the following by: (Check which mailing method you chose. If you sent it by both regular and certified mail, check both)

regular mail       certified mail       Federal Express Tracking No. **772960890568**

List each party to the lawsuit; use the attorney's name and address if the party is represented by counsel.

Name Mr. Stuart I. Seiden

Name \_\_\_\_\_

Address Duane Morris LLP

Address \_\_\_\_\_

30 S. 17<sup>th</sup> St. , Floor 5

Philadelphia, PA 19103

Attorney for All Defendants – listed below

Attorney for \_\_\_\_\_

Date: February 20, 2015

\_\_\_\_\_  
Signature:

Veronica Ann Williams

(print or type your name)

**Defendants represented by Mr. Seiden:**

Litton Loan Servicing,  
HSBC Bank USA, N.A.,  
Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates, Series 2006-C,  
Goldman Sachs,  
Ocwen,  
Stern & Eisenberg, PC,  
Powers Kirn, LLC

**NOTE: THE FIRST MOTION OF PROOF HEARING WAS SENT TO JUDGE MITTERHORFF ON FEB. 6, 2015 AND DELIVERED ON FEB. 11, 2015; AND SENT TO STUART SEIDEN ON FEB. 9, 2015 AND DELIVERED FEB. 12, 2015. THIS REVISED MOTION OF PROOF HEARING INCLUDES ADDITIONAL FORMS REQUESTED BY THE COURT. ATTORNEY SEIDEN IS BEING SENT THE ADDITIONAL DOCUMENTS REQUESTED BY THE COURT. THESE DOCUMENTS INCLUDE PAGES 1 & 7 – 16 OF THIS DOCUMENT. THE REMAINING PAGES OF THE MOTION DELIVERED TO SEIDEN ON FEB. 12, 2015 REMAIN UNCHANGED.**



## CERTIFICATION OF SERVICE SUPPORTING INFORMATION

DELIVERED TO DEFENDANTS' ATTORNEY: STEWART SEIDEN

**U.S. Postal Service™  
 CERTIFIED MAIL™ RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$ 45.95
Certified Fee	\$ 3.30
Return Receipt Fee (Endorsement Required)	\$ 2.70
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
<b>Total Postage &amp; Fees</b>	<b>\$ 11.95</b>

Sent To: Stuart Seiden, Duane Morris  
30 S. 17th St, Floor 5  
Philadelphia, PA 19103-4196

PS Form 3800, August 2006 See Reverse for Instructions

SOUTH ORANGE POST OFFICE  
 SOUTH ORANGE, New Jersey  
 070799998  
 3356730355-0098  
 02/09/2015 (800)275-8777 12:46:34 PM

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Sales Receipt

Product Description	Sale Unit Qty	Price	Final Price
@@ ~ PHILADELPHIA PA 19103-4001 Zone-2 Priority Mail 2-Day By Weight			\$5.95
1 lb. 15.70 oz.			
Expected Delivery: <u>Wed 02/11/15</u>			
Includes \$50 insurance			
Return Rcpt (Green Card)			\$2.70
@@ Certified USPS Certified Mail #: 70082810000223569708			\$3.30
Issue Postage:			\$11.95
<b>Total:</b>			<b>\$11.95</b>
Paid by: Debit Card			\$11.95
Account #:	XXXXXXXXXXXX8477		
Approval #:	787660		
Transaction #:	907		
	23903310878		
Receipt#:	002073		

@@ For tracking or inquiries go to [USPS.com](http://USPS.com) or call 1-800-222-1811.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
MR. Stuart I. Seiden  
Duane Morris  
30 S. 17th St, Floor 5  
Philadelphia, PA  
19103-4196

2. Article Number (Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee  
[Signature]

B. Received by (Printed Name) [Signature] C. Date of Delivery 2/12

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

FEB 12 2015

DELIVERED TO JUDGE MITTERHOF Fedex Tracking Number 772852766813

Your package has been delivered

Tracking # 772852766813

<p>Ship (P/U) date:  <b>Friday, 2/6/15</b></p> <p>ACT, Inc. NJ Office Attn V                  Williams                  ACT INC                  SOUTH ORANGE, NJ 07079                  US</p>	<p>Delivery date:  <b>Wednesday, 2/11/15</b>  <b>11:00 AM</b></p> <p>Judge Stephanie Ann                  Mitterhoff                  Superior Court of New Jersey                  470 Dr. Martin Luther King Jr.                  Blvd Historic Courthouse - 1st                  Floor                  NEWARK, NJ 07102                  US</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Delivered**

FORM C

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION**

\_\_\_\_\_  
Your Name

\_\_\_\_\_ County

\_\_\_\_\_  
Street Address

Docket Number \_\_\_\_\_

\_\_\_\_\_  
Town, State, Zip Code

**CIVIL ACTION  
Order**

\_\_\_\_\_  
Telephone Number

\_\_\_\_\_  
Plaintiff

vs.

\_\_\_\_\_  
Defendant

This matter having been brought before the Court on Motion of (check one)  
 plaintiff  defendant for an Order (describe relief requested)

and the Court having considered the matter and for good cause appearing,

It is on this \_\_\_\_\_ day of \_\_\_\_\_, 20  
ORDERED as follows:

\_\_\_\_\_, J.S.C.

- opposed
- unopposed



## MOTION FOR PROOF HEARING

The Plaintiff would like a jury to determine compensatory and punitive damages.

No amount of money can compensate for the near death incidents and trauma that the defendants put me through. The defendants' actions inflicted severe injury in the Plaintiff warranting payment of the following damages:

HURT TO PLAINTIFF	DAMAGES INCURRED	DAMAGES SOUGHT
<b>COMPENSATORY</b>	DOLLARS IN MILLIONS	
• Loss of ACT Inc. contracts	\$279.2 M	TBD
• Loss of Employability in field of experience (\$1.8M [\$300k * 6 YRS- 2009-2015])	\$2.1M	TBD
• Stress Induced Severe Prolonged Illness	\$500.0 M	TBD
<b>PUNITIVE</b>	SEVERE	TBD

Much of the proof is provided in the [Discovery](#) document filed with the court. Several witnesses will attest to injuries and proof documents are included. Recent validation from the Federal government is attached to this document.

### LOSS OF ACT INC. CONTRACTS

I invested 40 years, and in recent years, hundreds of thousands of dollars, to position ACT Inc. for lucrative, multi-year Federal task orders. ACT Inc. had been awarded Federal Supply Schedules, was positioned with multiple Federal agencies, and the Plaintiff was offered a FEMA job that would have given her a security clearance and the US Dept. Homeland Security past performance necessary to close task orders against ACT Inc.'s Federal Supply Schedule. The defendants' reneged on the modification, causing everything to be lost. Details are provided in the Discovery document.

### LOSS OF EMPLOYABILITY

As a financial, operations and information technology professional, the Plaintiff's ability to secure jobs depends on clean credit and no legal actions. While her record earned the Plaintiff and her firm contracts from major companies over her 35+ year career, she has been denied hundreds of jobs since the defendants' actions.

### STRESS INDUCED SEVERE PROLONGED ILLNESS

Defendants began deceptive actions in 2002. Their deception intensified in 2008. Despite convincing the Plaintiff that new ownership by Goldman Sachs had cleaned up their act, the deception of all defendants grew immensely. The Plaintiff did not realize the impact that the defendants' actions had on her health until her doctors began asking more probing questions. Soon it was clear that the Plaintiff's symptoms were directly correlated to and the direct result of, continued deception and depraved actions of the defendants. Between September 2012 and January 2013, she was hospitalized 3 times for stress induced illness. Her team of doctors ran every conceivable test to prove this.

### WHY HAVE DEFENDANTS SPENT MORE TO TAKE PLAINTIFF'S HOME THAN IT IS WORTH?

- The deception and fraud is clearly documented
- Dramatic decline in property value known to FEMA, HUD, HAMP, Ocwen and other defendants
- Hurricane Irene, Sandy, and poor maintenance warrant repairs that will exceed \$120,000
- Defendants fought with 6 law firms (Ex47: [PROOF](#)), plus investigators, insurance firms and other since 2010

### BECAUSE.....

- Plaintiff's case exposes "in and out" mortgage fraud
- 28.9% of US homeowners have been foreclosed upon (There have been [over 25 million foreclosures in the US since 2000.](#))
- New Jersey is #2 in foreclosures among US states
- HSBC is #2 bank in the world with assets of \$2.723Trillion
- Goldman Sachs is #28 bank in the world with assets of \$1.505Trillion
- \$263.7Million is what Ocwen paid Goldman Sachs for the Litton portfolio ([app 300K loans](#) ~ \$879 per loan?!)
- Value of mortgage portfolios involving HSBC likely to exceed \$100Billion [Forbes](#); HSBC sold only \$3.2Billion in 2013 [Bloomberg](#) & [NYTimes](#) & [HousingWire](#)
- HSBC left the US after underwriting Billions in mortgages and facilitating foreclosures
- There are foreclosures pending that will allow HSBC to take even more money out of the US

## SUMMARY OF WHAT HAPPENED

The first defendant (Litton Loan) purchased my mortgage when my equity was about three times the amount of the principal balance of my mortgage. Due to their predatory reputation, I refinanced with Fremont Investment and Loan to get it out of the hands of Litton Loan. Fremont Investment and Loan went out of business before rectifying their errors. Fremont's mortgage was part of the second defendant's trust, Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates 2006-C. Fremont's mortgage had been underwritten by the third defendant (HSBC). Fremont would prove as deceptive as the other defendants but Fremont Investment and Loan went out of business before the legal complaint had been filed. A year after executing the mortgage, Fremont Investment and Loan, the company that sold me the mortgage, went out of business and the first defendant (Litton Loan) acquired my mortgage again. During this time the fourth defendant (Goldman Sachs), a prominent US based financial firm, bought the first defendant (Litton Loan). So rather than move my mortgage to a financial firm with whom I had a 25-year stellar track record and who offered me a lower rate (Chase), I decided to accept the modification from the first defendant (Litton Loan) who was now owned by the fourth defendant (Goldman Sachs). A series of mistruths and deception by all defendants cost me everything I've worked for over the last 53 years, and almost took my life several times. To make matters worse, the defendants holding the mortgage have repeatedly failed to explain \$208,000 that has been added to the mortgage principal since this series of transactions began. The evidence supporting this statement is presented over and over in the Discovery document submitted to the Superior Court of New Jersey (download [click here](#)) as well as in this motion (download [click here](#)).

### ***COMPLETE MOTION AVAILABLE UPON REQUEST***

DEFENDANTS & CULPABLE, OUT OF BUSINESS FIRM	
1 <sup>st</sup>	Litton Loan
2 <sup>nd</sup>	Fremont Home Loan Trust 2006-C Mortgage Backed Certificates
3 <sup>rd</sup>	HSBC
4 <sup>th</sup>	Goldman Sachs
5 <sup>th</sup>	Stern & Eisenberg PC
6 <sup>th</sup>	Powers Kirn LLC
OUT OF BUSINESS	Fremont Investment and Loan

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**EXHIBIT A  
DEFENDANTS' POWER**

	<b>WORLD RANK</b>	<b>ASSETS</b>
		<b>US DOLLARS</b>
Goldman Sachs	28	\$1,505,000,000,000
HSBC	2-3	\$2,723,000,000,000
Ocwen	NA	\$7,873,770
Fremont	NA	NA
JP MorganChase	6-9	\$2,463,000,000,000

There have been [over 25 million foreclosures in the US since 2000](#). That is 28.9% of all homeowners!

Nearly 6 million Americans have been forced from their homes. Many were the victims of mortgage fraud. I too am one of these victims. I bought my home over 31 years ago. Now, I find myself fighting the firms that deceived me.

After 6 long years of deception, crafty legal maneuvers, and character assassination, I have won a default judgment and am seeking a proof hearing to determine damages.

This fight is about much, much more than saving my home. I have lost contracts, jobs and was hospitalized multiple times due to stress. I am "all in" to win my battle against HSBC, Goldman Sachs, Ocwen and those who have taken my income and health.

To learn more, please visit [www.FinFix.org](http://www.FinFix.org) or send an email to [BankFraud@FinFix.org](mailto:BankFraud@FinFix.org).

**EXHIBIT A – 1**

***“IN SEARCH OF REPRESENTATION” MESSAGE SENT TO ATTORNEYS***

I am in search of a NJ attorney who is honest, courageous and has won fraud cases against financial firms.

On Monday, November 17, 2014, The Superior Court of New Jersey Essex County Vicinage Law Division granted me a default judgment against Goldman Sachs, HSBC Bank USA, Ocwen, Fremont Home Loan Trust (**Docket ESSX L – 004753-13**). The Discovery summary, with updates, is attached (1\_GoldmanSachs-Story\_v5-attorney-search.docx ). You may click on the hyperlinks to see the proof as you read. Or, you can download the summary with all documents attached – 503 pages—by clicking on this link [http://finfix.org/proof/DD/Discovery-Documents ALL 11-18-14.pdf](http://finfix.org/proof/DD/Discovery-Documents_ALL_11-18-14.pdf). Additional information can be found at [www.FinFix.org](http://www.FinFix.org).

We need to schedule a proof hearing, file a motion to dismiss the foreclosure (**Docket F-00839-13**), file a motion to discharge mortgage, defeat an appeal (if necessary), and anything else the attorney advises me to do.

I can be reached by phone at 202-486-4565 or [VWilliams@OfficeThatWorks.com](mailto:VWilliams@OfficeThatWorks.com). Please contact me at any time, as soon as possible. I look forward to speaking with whomever can help.

Thank you,

Veronica Williams

[www.VeronicaWilliams.com](http://www.VeronicaWilliams.com)

## EXHIBIT B

### PUTTING IT INTO PERSPECTIVE: Info Not Included in Discovery Document (SEE EXHIBIT C – DISCOVERY SUBMISSION FOR DOCKET NO. ESSEX-L-004753-13)

#### RELEVANT ACTIONS PRIOR TO DEFENDANTS DECEIVING PLAINTIFF

Many actions transpired that created the environment for deceit and that embodies practices that results in conduct that is unfair to customers. The restructuring of long-established financial institutions; alliances with firms that do not employ best practices; and fast moving changes in ownership and a quick paced flow of funds combine to facilitate actions that do not properly record transactions and deceive customers. *The apparent strategy was to acquire mortgages of homeowners with high equity and do everything possible to take their homes.* At least 2 defendants admitted their roles publicly; this document interprets those admissions by finding pertinent data and connecting the dots. The environment and just a few of these actions are highlighted below:

Larry Litton Jr., Litton Loan's President, ran ads in major financial publications to boost the company's perceived value while internal operations were likely damaging customers' credit and adding unjust amounts to the loan principal. Litton Loan had systematic and systemic flaws in the firm's operations that damaged customers' financial positions and boosted Litton Loan's portfolio value. Larry Litton's ads were, therefore, a red herring that diverted attention away from the reason for trial modification *offers*, and focused on creating a positive public image and a perceived value for investors.

Goldman Sachs acquired a huge liability with the purchase of Litton Loan. Before transferring the Litton Loan portfolio to Ocwen, Goldman Sachs agreed to "remediate" the problem. Goldman Sachs' deal with the SEC was barely a slap on the wrist. Selling the Litton Loan portfolio to Ocwen diluted the impact of the problems temporarily while dispersing and transferring responsibility for deceiving customers to Ocwen. Creating a \$100 million fund is not enough. Every single mortgage that was once part of the Litton Loan portfolio should be **discharged** and written off. In other words, customers should no longer be held responsible for making any payments, now and forever more. Mortgages that were underwritten or serviced by HSBC may also need to be discharged. The defendants surely did to others what they did to me. The damage has been inflicted for years, across multiple mortgage servicing firms. The current owner of the mortgages owns the cost. The legal profession would call these damages incurred from "the fruit of the poisonous tree".

- 7-10-1850 Marine Midland began (Ex B-1: [Wikipedia](#))
- 3-3-1865 The **Hongkong and Shanghai Banking Corporation** (HSBC) was established in Hong Kong, China (Ex-B-2: [Cited](#)) HSBC Bank USA, N.A. CIK#: [0001582152](#) (Ex-B-3: [first SEC filing date](#) 7-23-13)
- 12-2-1938 Ocwen Federal Bank established ( Ex-B-4: [FDIC Certificate #: 30028](#))
- 1967 Midland Bank purchases a one-third share in the parent of London merchant bank Samuel Montagu & Co. Limited (now HSBC Republic Bank (UK) Limited (Ex-B-5: [HSBC reference](#))
- 1985 Enhance Financial Services established (Ex-B-6: CIK# [0000881889](#) & [About](#))
- 1987 HSBC extended 51% share to full ownership of Marine Midland Bank (Ex-B-7: [Cited](#))
- Feb. 1988 Ocwen established (Ex-B-8: [About](#), CIK# [0000873860](#))
- 1988 Litton Loan established (Ex-B-9: [Profile](#))
- 2-8-1995 ENHANCE FINANCIAL SERVICES GROUP INC (Ex-B-10: CIK#: [0000881889](#) Ex-B-6: [first SEC filing date](#))



- **1997/2007** When did Enhanced Financial Services buy Litton Loan (Ex-B-11: [SEC Filing](#)) (Ex-B-11: [SEC Filing](#)) (Ex-B-12: [Money Trail](#))
- **6-4-1996** OCWEN FINANCIAL CORP Ex-B-8: CIK#: [0000873860](#) Ex-B-13: [initial SEC Filing](#)
- **1996** C-Bass was formed and “added” Litton Loan to its holdings. ([Standard & Poors evaluation](#))  
In 1996, Litton was added to a newly formed investment company, C-BASS, as part of an initial investment made by Enhance Financial Services, its owner at the time. Enhance, which later was purchased by Radian Group Inc. (Radian), co-invested in C-BASS with MGIC Investment Corp. (MGIC) in July 1996 to form C-BASS LLC. MGIC and Radian each owned a 42% interest in C-BASS LLC, with the remainder owned by C-BASS senior management. C-BASS was a large purchaser of credit-sensitive assets, which consisted primarily of subprime mortgages. As an outgrowth of this strategy, Litton began servicing subprime accounts in 1998. Due to liquidity pressures, C-BASS LLC sold Litton to Goldman Sachs Group Inc. in December 2007.
- **2-16-1999** HSBC acquired (Ex-B-14: [SEC listing](#)) Marine Midland Bank (Ex-B-14: CIK# [0000062346](#)) HSBC USA INC Ex-B-15: CIK#: [0000062348](#) & [6-2-1996 SEC Filing](#)
- **2-17-1999** Enhanced Financial Services first SEC filing (Ex-B-16: CUSIP No. [0000881889](#); [Statement of Acquisition](#))
- **7-27-1999** Republic National Bank initial SEC filing (Ex-B-17: CIK# [0000315053](#))
- **12-31-1999** HSBC acquired Republic National Bank (Ex-B-18: CIK#[0000083246](#)) [effective Jan. 3, 2000](#)
- **11-1-2000** C-Bass sells Litton Loan (Ex-B-19: [SEC filing 12-14-2001](#)) to Residential Asset Funding Corporation (Ex-B-20: [SEC filing](#)) Litton has complied with Section 3.27 of the Pooling and Servicing Agreement by and between Residential Asset Funding Corporation, as Depositor, Credit-Based Asset Servicing and Securitization LLC, as seller, The Chase Manhattan Bank, as Trustee and Litton Loan Servicing LP, as Servicer, dated November 1, 2000.
- **11-14-2000** Radian acquires Enhanced Financial Services (Ex-B-21: [PressRelease](#))
- **1-12-2001** SEC shows Litton Loan a subsidiary of Enhance Financial & affiliate of C-Bass (Ex-B-11: [SEC Filing](#))
- **2-26-2002** C-BASS CAPITAL LLC (Ex-B-22: CIK#: [0001038155](#) formerly: HEMLOCK CAPITAL LLC first SEC filing)
- **12-27-2000** Goldman Sachs advised Radian on acquisition of Enhanced Financial Services (Ex-B-23: [SEC filing](#))
- **1-22-2001** HSBC Bank formerly Republic National Bank HSBC BANK USA (Ex-B-24: CIK#: [0000315053](#) last SEC filing)
- **12-21-2004** **New Jersey Department of Banking and Insurance: NJ’s Predatory Lending Law Protecting Consumers** Ex-B-25: <http://www.state.nj.us/dobi/pressreleases/pr041221.htm>
- **2-16-2005** Deloitte & Touche Report on Litton Loan filed with SEC Ex-B-26: [filed with SEC](#)
- **8-25-2006** FREMONT HOME LOAN TRUST 2006-C (Subject) (Ex-B-27: CIK: [0001373810](#) [Initial SEC filing](#) by FREMONT MORTGAGE SECURITIES CORP (Filed by) Ex-B-27: CIK: [0001099390](#)
- **3-8-2007** The Federal Deposit Insurance Corp. announced the cease-and-desist order with Fremont Investment & Loan (Ex-B-28: [Article](#))
- **12-11-2007** C-Bass sells Litton Loan to Goldman Sachs (Ex-B-29: [Article](#))
- **11-21-2007** SEC Launches Probe of MGIC, Radian (Ex-B-30: [Article](#))
- **11-24-2007** **Financiers, Wall street Journal & other publications not fooled** (Ex-B-31: [Article](#) OR [Article](#))
- **12-2007** Goldman Sachs to Cash In Big Time with Acquisition of Litton Loan (Ex-B-32: [Article](#) or [Article](#))
- **2007** **One reason that Goldman Sachs may have bought Litton Loan:**  
C-Bass was among more than 100 mortgage lenders and investors forced to halt operations or find buyers in 2007 amid the worst housing slump in 16 years. Its majority owners were MGIC Investment Corp. and Radian, the nation’s No. 1 and No. 3- ranked mortgage insurers. - See more at: (Ex-B-32: [Article](#) or [Article](#))
- **9-21-2008** HSBC dumps over \$40 billion in loans (Ex-B-33: [Article](#) & [Article](#) & [Article](#))
- **7-15-2009** **New Jersey Attorney General Announces Mortgage Fraud Lawsuits** (Ex-B-34: [Article](#))
- **9-30-2009** HSBC moves headquarters to avoid fines (Ex-B-35: [Article](#) & [Article](#) & [Article](#) & [Article](#) & [Article](#))
- **1-27-2010** **Litton Loan not favorably viewed by industry** (Ex-B-36: [Article](#) & [Article](#) & [Article](#) & [Article](#))
- **4-16-2010** SEC is charging Goldman Sachs with fraud over its structuring of CDOs, saying “the bank created and sold a mortgage investment that was secretly devised to fail.” - See more at: **Ex-B-37: [Article](#)** [http://www.cjr.org/the\\_audit/goldman\\_sachs\\_fraud\\_charges\\_ar.php#sthash.CpLr1i0n.dpuf](http://www.cjr.org/the_audit/goldman_sachs_fraud_charges_ar.php#sthash.CpLr1i0n.dpuf)
- **6-22-2010** Larry Litton Jr., Litton Loan, claims 100,000 trial modifications, almost 1/3 of portfolio, in letter to Financial Times Ex-B-38: [Article](#) **How many modifications were actually granted? P 5**
- **7-9-2010** Legal Complaint alleges HSBC underwriting facilitates mortgage fraud (Ex-B-39: [Legal Complaint](#))
- **11-9-2010** Goldman Sachs suspended evictions & foreclosures in some states (Ex-B-40: [article](#))

- **11-12-2010** C-Bass (Credit-Based Asset Servicing and Securitization LLC) files bankruptcy (sold Litton Loan in 2007) (Ex-B-41: [Article](#))
- **3-6&13-11** **Financial Firms' Errors Recognized by Many** (Ex-B-42: [Article](#) & [Article](#))
- 6-6-2011 Goldman Sachs sells Litton Loan to Ocwen (Ex-B-43: [Article](#))
- **9-1-2011** Goldman Sachs Agreement with Federal Reserve **intended to provide remediation to borrowers who suffered financial injury WAS INSUFFICIENT.** The Federal Reserve Board announced a formal enforcement action against the Goldman Sachs Group, Inc. and Goldman Sachs Bank USA to address a pattern of misconduct and negligence relating to deficient practices in residential mortgage loan servicing and foreclosure processing involving its former subsidiary, Litton Loan Servicing LP. Ex-B-44: [Article](#)
- **9-6-2011** Goldman Sachs playing both sides of BofA \$8.5B settlement (Ex-B-45: [Article](#))
- **11-10-2011** **HSBC continues to dump billions in loans** (Ex-B-33: [Article](#) & [Article](#) & [Article](#))
- **8-2-2011** **HSBC lays off 30,000 U.S. employees; the number will rise as time goes on** (Ex-B-46: [Article](#) & [Article](#) & [Article](#))
- **6-7-2012** **Damages by HSBC recognized by people worldwide** (Ex-B-47: [Article](#) & [Article](#))
- **5-17-2013** **HSBC lays off another 14,000 employees** (Ex-B-46: [Article](#) & [Article](#) & [Article](#))
- **7-23-2013** **HSBC Bank USA, N.A.** Ex-B-40: CIK#: **0001582152** (Ex-B-48: Form 13F [first SEC filing date](#) 7-23-13) ♦ (Affiliated with ?? HSBC established in Hong Kong, China in 1865 (Ex-B-2: [Cited](#)) )
- **2-1-2014** **Plaintiff's Response to Character Assassination by Defendant's attorney** (Ex-B-49)
- **10-21-14** **HSBC Board Member chastises protestors** (Ex-B-50: [Article](#) & [Article](#))
- **10-30-2014** Ocwen sets aside \$100M for possible foreclosure settlements (Ex-B-51: [Article](#))
- **9-1-20014** **HSBC Culpability Recognized Worldwide** (Ex-B-51: [Article](#) & [Article](#))
- 12-13-14 **Recount of 'in and out' fraud** (Ex-B-52: [Article](#)) A CHRONOLOGY, COST & CONSEQUENCE OF "ERRORS" REFERENCE EXHIBIT FROM DISCOVERY DOCUMENT
- **11/14/14** The **Discovery** document submitted to the Superior Court of New Jersey and to the defendants' attorney, clearly documents "errors or fraud" by the defendants. This includes a financial amortization backed by official documents of the mortgages services and offered by the defendants. **At least \$208,000 of the mortgage principal balance has not been accounted for. Defendants still have not provided complete transactional reports for the mortgages in questions.** (Ex-C: [Download](#) )
- **2/4/15** The SBA has denied, multiple times, loans for which the Plaintiff was entitled. **The SBA cites the Defendants' actions as the reason why Plaintiff's loan was denied.** (Ex-D: [Letter](#) & [Letter](#) )
- **2/5/15** **Witnesses** will provide further collaboration. Witnesses were presented to the NJ Court and the defendants' attorney in the physical Discovery document submitted. **These witnesses will present indisputable evidence of wrongdoing by defendants and the consequential damages to the Plaintiff. Since some of our current and intended witnesses have been intimidated by people working on behalf of the Defendants, the names of those chosen to testify will not be revealed until the day of testimony.** (Ex-E: [Download](#) )
- TBA

*Firms that continue to appear throughout our research on this matter include, but are not limited to:*

*Chase  
Deloitte & Touche  
Goldman Sachs  
Residents of 335 Madison Ave., NY, NY*

**ADDITIONAL INFORMATION AVAILABLE ON A NEED TO KNOW BASIS**

EXHIBIT B – 1  
MARINE MIDLAND IN WIKIPEDIA

1/18/2015

Marine Midland Bank - Wikipedia, the free encyclopedia

## Marine Midland Bank

From Wikipedia, the free encyclopedia

**Marine Midland Bank** was a bank formerly headquartered in Buffalo with several hundred branches throughout the state of New York.

Marine Midland began in 1850 in Buffalo as the Marine Trust Company with the objective of financing the new shipping trade on the Great Lakes. As the bank expanded into New York state it added the Midland to its name.

In the summer of 1850, eight men gathered in Buffalo to form a new commercial bank. They had come from throughout the state—General James S. Wadsworth of Geneseo, J. P. Beekman of Kinderhook, John Arnot of Elmira, John Magee and Constant Cook of Bath, William R. Gwinn of Medina, and George Palmer and James M. Ganson of Buffalo. [Both Palmer and Wadsworth of Buffalo had railroad connections. The two had financial interests in and served as directors of the Attica and Hornell Railroad, while Palmer had links also with the Buffalo and State Line Railroad.] The geographic diversity of the men indicated that the plan was to extend eventually the bank's services across the state.

[By 1981] Marine Midland Bank N.A. accomplished that goal and has gone even further. It was the nation's 13th largest commercial bank with about 300 banking offices in more than New York communities and about 25 offices in foreign countries.

### History

Marine Bank was founded as a state-chartered bank on July 10, 1850, with capital of \$170,000. Palmer was elected president and Ganson was named cashier.

The new institution was called Marine Bank because much of its early business depended on the economic vitality of the city's lakefronts and riverfronts. From the first day it opened its doors on August 27 at 79 Main Street, Marine was the prominent bank for the thriving grain and milling industry on the waterfront.

By the start of the 20th century, Marine Bank of Buffalo began to expand through merger. In 1897 it absorbed the American Exchange Bank and in 1902 it acquired the Buffalo Commercial Bank. That same year it became a national bank and changed its name to Marine National Bank of Buffalo.

**Marine Midland Bank, N.A. (1980–1999)**

**Marine Midland Banks Inc (1929–1995)  
HSBC Americas (1995–1999)**



<b>Former type</b>	NYSE MM 1920–1987 Subsidiary of HSBC Holdings plc 1987–1999
<b>Industry</b>	Finance and Insurance
<b>Fate</b>	Acquired by HSBC, 51% 1980 and 100% 1987 renamed HSBC Bank USA 1999
<b>Founded</b>	July 10, 1850
<b>Defunct</b>	March 29, 1999
<b>Headquarters</b>	Buffalo, NY, United States
<b>Key people</b>	Malcom Burnett, President and CEO
<b>Products</b>	Financial Services
<b>Slogan</b>	Let's work it out together
<b>Website</b>	<a href="http://www.us.hsbc.com">http://www.us.hsbc.com</a>

**EXHIBIT B – 1 cont'd.**  
**MARINE MIDLAND IN WIKIPEDIA**

1/18/2015

Marine Midland Bank - Wikipedia, the free encyclopedia

The next acquisition came in 1913 when Marine absorbed Columbia National Bank. That same year, the bank built a new 17-story office building in Buffalo known as the Marine Midland Trust Company Building.

Six years later Bankers Trust was acquired. Marine chose to become a state bank again, this time under the name Marine Trust Company of Buffalo. By the mid-1930s, Marine had acquired eight other banks.

Marine had also taken the lead in the formation of Marine Midland Corporation, a holding company for affiliating 17 banks throughout New York. That first multibank holding company in the state was formed October 4, 1929.<sup>[1]</sup> 20 days later would be the Wall Street Crash of 1929.

As a result of 11 mergers throughout Western New York, Marine Trust Company became Marine Midland Trust Company of Western New York in the 1950s. The name was changed again in the 1960s to Marine Midland Trust Company of Western New York and again in 1970 to Marine Midland Bank-Western.

On January 1, 1976, all previously independent Marine Banks were merged into a single Marine Midland Bank with headquarters in Buffalo. The new bank was divided into regions, with Marine Midland Bank-Western Region based in Buffalo.

Marine Midland Bank became a national-chartered bank in early 1980. As it entered the 1980s, assets were close to \$20 billion.<sup>[2]</sup>

In 1980 The Hongkong and Shanghai Banking Corporation acquired a 51% shareholding in Marine Midland Bank, which it extended to full ownership in 1987. In 1994, Marine Midland acquired Spectrum Home Mortgage, which operated in eight states. Then in 1995, Marine acquired United Northern Federal Savings Bank, with branches in Watertown and Lowville, New York. Marine Midland also acquired The Hongkong and Shanghai Banking Corporation's six New York City retail branches, and the next year Hang Seng Bank's two branches in New York City. That same year, Marine Midland acquired 11 branches from the East River Savings Bank in the New York Metropolitan area. Marine also acquired the US dollar clearing business of J P Morgan. At the same time, HSBC transferred two branches in the northwestern United States to HSBC Bank Canada. The next year, Marine completed its acquisition of First Federal Savings and Loan from Toronto-based CT Financial Services, for \$620 million. First Federal Savings, headquartered in Rochester, had \$7.2 billion in assets, 1,600 employees, 79 retail branches in New York State and 15 mortgage origination offices in nine states.

In 1998, Marine Midland acquired First Commercial Bank of Philadelphia, which had been established in 1989 as the first state-chartered Asian-American bank in Pennsylvania. The bank served the local Asian community, which often faced language and cultural barriers at traditional American banks. Marine paid \$23.75 million for First Commercial, which had \$90 million in assets and \$78 million in deposits in two branches.

The bank continued to operate under the Marine Midland name until 1998, when the branch offices were rebranded as HSBC and the legal name changed to HSBC Bank USA N.A.. In 1983, Marine Midland Bank acquired Carroll McEntee & McGinley (now HSBC Securities (USA)), a New York-based primary dealer in US government securities. Most of Marine Midland's Upstate New York branches are now owned by Buffalo based First Niagara Bank.

## EXHIBIT B – 1 cont'd. MARINE MIDLAND IN WIKIPEDIA

1/18/2015

Marine Midland Bank - Wikipedia, the free encyclopedia

Marine Midland owned, either wholly or in part, several prominent New York City properties, including 250 Park Avenue (100%) and the Marine Midland Building at 140 Broadway in Manhattan (indirect 20% participation in Harry Helmsley's interest), near the World Trade Center. Completed in 1967, this 52-story, 688 ft (209.7 m) highrise provides 1.2 million square feet (110,000 m<sup>2</sup>) of office space in lower Manhattan and is noted for Isamu Noguchi's distinctive *Cube* sculpture at its entrance.

Also of note, Marine Midland had purchased naming rights to the Buffalo sports and entertainment venue constructed in 1996, the Marine Midland Arena, home of the Buffalo Sabres. Today, the venue is known as the First Niagara Center.

### References

- <sup>^</sup> "Huge New Company Will Buy 16 Banks" (<http://select.nytimes.com/gst/abstract.html?res=FB0F13F73A5C177A93CBA81782D85F4D8285F9>). *New York Times*. September 19, 1929. Retrieved 2012-08-12. "The Marine Midland Corporation, a holding and management company, is being organized by New York banking interests to acquire ownership of banks and trust companies in New York State and ultimately in other States. ..."
- <sup>^</sup> Brown, Richard C.; Bob Watson (1981). *Buffalo: Lake City in Niagara Land*. Windsor Publications. p. 297. ISBN 0-89781-036-8.

Retrieved from "[http://en.wikipedia.org/w/index.php?title=Marine\\_Midland\\_Bank&oldid=616792765](http://en.wikipedia.org/w/index.php?title=Marine_Midland_Bank&oldid=616792765)"

Categories: Defunct banks of the United States | HSBC acquisitions

| Defunct companies based in New York | Banks based in New York | Banks established in 1850

- 
- This page was last modified on 13 July 2014, at 14:52.
  - Text is available under the Creative Commons Attribution-ShareAlike License; additional terms may apply. By using this site, you agree to the Terms of Use and Privacy Policy. Wikipedia® is a registered trademark of the Wikimedia Foundation, Inc., a non-profit organization.

EXHIBIT B – 2  
HONG KONG SHANGHAI BANKING CORPORATION (HSBC) FOUNDING DATE

1/18/2015

hsbc bank established date - Google Search

hsbc bank established date

+Veronica

Web News Images Shopping Maps More Search tools

About 37,800,000 results (0.01 seconds)

**HSBC Bank - hsbc.com**

Ad [www.us.hsbc.com/](http://www.us.hsbc.com/)

Bank Around the World as Easily as You Do at Home.

Rating: Website 8.5/10 - Introductory rates 8/10 - Balance transfers 8/10

You've visited hsbc.com 2 times. Last visit: yesterday

Branch Locator

Global Cash Management

HSBC Premier

HSBC Advance

March 3, 1865

HSBC, Date founded



Photo by

**HSBC - Wikipedia, the free encyclopedia**

en.wikipedia.org/wiki/HSBC - Wikipedia

HSBC Holdings plc was established in the United Kingdom in 1991 as the parent company to the Hongkong and Shanghai Banking Corporation in preparation ...

List of largest banks - The Hongkong and Shanghai ... - Douglas Flint - Middle East  
You visited this page on 1/18/15.

**HSBC's History**

[www.hsbc.com/hk/about/home/hsbc-s-history](http://www.hsbc.com/hk/about/home/hsbc-s-history) - HSBC

Hongkong Bank of Canada (now HSBC Bank Canada) was established in 1991 and ...  
Midland was founded in 1838 in Birmingham and had grown in the ...

**HSBC's history | HSBC Holdings plc - HSBC.com**

[www.hsbc.com/about-hsbc/company-history/hsbc-history](http://www.hsbc.com/about-hsbc/company-history/hsbc-history) - HSBC

Soon after its formation, the bank began opening branches to expand the services it could offer customers. Although that network reached as far as Europe and ...

## HSBC

Banking company

HSBC Holdings plc is a British multinational banking and financial services company headquartered in London, United Kingdom. It is the world's second largest bank. [Wikipedia](#)

Customer service: 1 (800) 875-4722

Stock price: **HSBC (NYSE)** \$26.58 -0.04 (-0.04%)

Jan 18, 4:03 PM EST - [Disclaimer](#)

Headquarters: London, Greater London

CEO: Stuart Gulliver

Founder: Thomas Sutherland

Founded: March 3, 1865, Hong Kong, China

### Profiles



LinkedIn



Facebook



Twitter



Google+

### People also search for

View 15+



Santander Group



BNP Paribas



Industrial and Commercial Bank of China



Scotiabank



Capital One

EXHIBIT B – 3  
 HSBC Bank USA, N.A. CIK#: [0001582152](#) First SEC Filing Date

1/18/2015

EDGAR Filing Documents for 0001582152-13-000002



[Home](#) | [Latest Filings](#) | [Previous Page](#)

U.S. Securities and Exchange Commission

Filing Detail

[Search the Next-Generation EDGAR System](#)

[SEC Home](#) » [Search the Next-Generation EDGAR System](#) » [Company Search](#) » [Current Page](#)

Form 13F-NT - Quarterly report filed by institutional managers, Notice

SEC Accession No. 0001582152-13-000002

<b>Filing Date</b> 2013-07-23	<b>Period of Report</b> 2013-06-30
<b>Accepted</b> 2013-07-23 11:59:25	<b>Filing Date</b> Changed
<b>Documents</b> 1	<b>Effectiveness Date</b> 2013-07-23

Document Format Files

Seq	Description	Document	Type	Size
1		<a href="#">primary_doc.html</a>	13F-NT	
1		<a href="#">primary_doc.xml</a>	13F-NT	1873
	Complete submission text file	<a href="#">0001582152-13-000002.txt</a>		2964

HSBC Bank USA, N.A. (Filer) CIK: [0001582152](#) ([see all company filings](#))


IRS No.: 201177241 | State of Incorp.: VA | Fiscal Year End: 1231  
 Type: 13F-NT | Act 34 | File No.: [028-16662](#) | Film No.: 13880782


Business Address  
 1000 TYSONS BLVD.  
 SUITE 60  
 MCLEAN VA 22102  
 710 841-7497

Mailing Address  
 ATRIUM BUILDING  
 98 WASHINGTON  
 STREET, SIXTH  
 FLOOR  
 BUFFALO NY 14203



**EXHIBIT B – 4**  
**OCWEN FEDERAL BANK ESTABLISHED**

**Federal Deposit Insurance Corporation**  
Each depositor insured to at least \$250,000 per insured bank

  
Advanced Search

---

Home > [Industry Analysis](#) > [Bank Data & Statistics](#) > [Institution Directory Home](#)

**Search**

[BankFind](#) | [Institution Directory](#) | [Banks](#) | [Locations](#) | [Bank Holding Companies](#) | [All](#) | [Download Data](#) | [Disclaimer and Methodology](#) | [Questions](#)

[Print this page](#)

---

Key demographic information as of January 15, 2015

**Ocwen Federal Bank FSB**  
2400 Lemoine Avenue  
Fort Lee, NJ 07024

FDIC Certificate #: 30028	Date Established: 12/2/1938	Date of Deposit Insurance: 12/2/1938
<a href="#">Bank Charter Class:</a> Savings Association		
<a href="#">Primary Federal Regulator:</a> <a href="#">Office of Thrift Supervision</a>		<a href="#">More Demographic Information</a> →
<a href="#">Primary Internet Web Address:</a> Web site not available.		<a href="#">Generate History</a> →

---

**This is an inactive institution.**

Inactive as of: June 30, 2005	This institution was involved in a <b>Voluntary Liquidation and Closing</b> .
Closing history:	This action did not result in a new institution.
Acquiring institution:	

---

**Information Gateway**

ID Report Selections: <input type="text" value="Assets and Liabilities"/>	Report Date: <input type="text" value="March 31, 2005"/>	<input type="button" value="Generate Report"/>
------------------------------------------------------------------------------	-------------------------------------------------------------	------------------------------------------------

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[More Information](#)



**EXHIBIT B – 5**  
**MIDLAND BANK PURCHASES 1/3 OF HSBC REPUBLIC BANK UK**



Search in site [Search](#)

[Our Vision and Values](#) [HSBC Group](#) [HSBC Turkey](#) [Corporate Social Responsibility](#)

[Home Page](#) / [About HSBC](#) / [HSBC Group](#)

[Türkçe](#)

[> HSBC Group](#)

## HSBC Group

### Key events in the growth of the HSBC Group

The HSBC Group evolved from The Hongkong and Shanghai Banking Corporation Limited, which was founded in 1865 in Hong Kong with offices in Shanghai and London and an agency in San Francisco. The Group expanded primarily through offices established in the bank's name until the mid-1950s when it began to create or acquire subsidiaries. The following are some key developments in the Group's growth since 1959.

1959	The Hongkong and Shanghai Banking Corporation acquires The British Bank of the Middle East (formerly the Imperial Bank of Persia, now called HSBC Bank Middle East).
1965	The Hongkong and Shanghai Banking Corporation acquires a majority shareholding in Hang Seng Bank Limited, now the second-largest bank incorporated in Hong Kong.
1967	Midland Bank purchases a one-third share in the parent of London merchant bank Samuel Montagu & Co. Limited (now HSBC Republic Bank (UK) Limited).
1972	Midland Bank acquires a shareholding in UBAF Bank Limited (now known as British Arab Commercial Bank Limited).
1978	The Saudi British Bank is established under local control to take over The British Bank of the Middle East's branches in Saudi Arabia.
1980	The Hongkong and Shanghai Banking Corporation acquires 51% of New York State's Marine Midland Bank, N.A. (now called HSBC Bank USA). Midland acquires a controlling interest in leading German private bank Trinkaus & Burkhardt KGaA (now HSBC Trinkaus & Burkhardt KGaA).
1981	Hongkong Bank of Canada (now HSBC Bank Canada) is established in Vancouver. The Group acquires a controlling interest in Equator Holdings Limited, a merchant bank engaged in trade finance in sub-Saharan Africa.
1982	Egyptian British Bank S.A.E. is formed, with the Group holding as 40% interest.
1983	Marine Midland Bank acquires Carroll McEntee & McGinley (now HSBC Securities (USA) Inc.), a New York-based primary dealer in US government securities.

EXHIBIT B – 6  
 ENHANCE FINANCIAL SERVICES GROUP – SEC & BLOOMBERG

1/18/2015

EDGAR Filing Documents for 0000732812-95-000084



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U.S. Securities and Exchange Commission

Filing Detail

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[SEC Home](#) » [Search the Next-Generation EDGAR System](#) » [Company Search](#) » [Current Page](#)

Form SC 13G - Statement of acquisition of beneficial ownership by individuals [amend]			SEC Accession No. 0000732812-95-000084
<b>Filing Date</b> 1995-02-08	<b>Group Members</b> CAPITAL GROUP COMPANIES INC/CAPITAL GUARDIAN TRUST COMPANY	<b>SRGc</b> NYSE PHLX	
<b>Accepted</b> 1995-02-08 00:00:00			
<b>Documents</b> 1			

Document Format Files

Seq	Description	Document	Type	Size
1	Complete submission text file	0000732812-95-000084.txt	SC 13G/A	12705

**CAPITAL GROUP COMPANIES INC (Filed by) CIK: 0000732812 (see all company filings)**  
 State of Incorp.: CA | Fiscal Year End: 1231  
 SIC: 0000  
 Business Address: 333 SO HOPE ST, 62ND FL, LOS ANGELES CA 90071 213469426  
 Mailing Address:

**ENHANCE FINANCIAL SERVICES GROUP INC (Subject) CIK: 0000881889 (see all company filings)**  
 IRB No.: 133333448 | State of Incorp.: NY | Fiscal Year End: 1231  
 Type: SC 13G/A | Act: 34 | File No.: 006-42278 | Film No.: 86508334  
 SIC: 8399 Insurance Carriers, NEC  
 Assistant Director 1  
 Business Address: 336 MADISON AVE, NEW YORK NY 10017 2129533100  
 Mailing Address:

1/18/2015

Enhance Financial Services Group, Inc.: Private Company Information - Businessweek

Insurance  
 Company Overview of Enhance Financial Services Group, Inc. January 18, 2015 7:22 PM ET

Snapshot

People

Company Overview

Enhance Financial Services Group, Inc. provides financial guaranty insurance and reinsurance and other credit-based products. Enhance Financial Services Group, Inc. was founded in 1985 and is based in New York, New York. As of February 28, 2001, Enhance Financial Services Group Inc is a subsidiary of Radian Group Inc.

335 Madison Avenue  
 New York, NY 10017  
 United States

Phone: 212-983-3100

Founded in 1985  
 265 Employees

Key Executives For Enhance Financial Services Group, Inc.

<b>Mr. Daniel J. Gross</b> Chief Executive Officer Age: 71
<b>Mr. Samuel Bergman</b> Executive Vice President Age: 66
<b>Mr. Richard J. Dunn</b> Executive Vice President Age: 67

Compensation as of Fiscal Year 2014.

EXHIBIT B – 7

HSBC COMPLETES ACQUISITION OF MARINE MIDLAND BANK  
FOR COMPLETE DOCUMENT VISIT: [http://en.wikipedia.org/wiki/HSBC\\_Bank\\_USA](http://en.wikipedia.org/wiki/HSBC_Bank_USA)

1/18/2015

Marine Midland Bank - Wikipedia, the free encyclopedia

## Marine Midland Bank

From Wikipedia, the free encyclopedia

**Marine Midland Bank** was a bank formerly headquartered in Buffalo with several hundred branches throughout the state of New York.

Marine Midland began in 1850 in Buffalo as the Marine Trust Company with the objective of financing the new shipping trade on the Great Lakes. As the bank expanded into New York state it added the Midland to its name.

In the summer of 1850, eight men gathered in Buffalo to form a new commercial bank. They had come from throughout the state—General James S. Wadsworth of Geneseo, J. P. Beekman of Kinderhook, John Arnot of Elmira, John Magee and Constant Cook of Bath, William R. Gwinn of Medina, and George Palmer and James M. Ganson of Buffalo. [Both Palmer and Wadsworth of Buffalo had railroad connections. The two had financial interests in and served as directors of the Attica and Hornell Railroad, while Palmer had links also with the Buffalo and State Line Railroad.] The geographic diversity of the men indicated that the plan was to extend eventually the bank's services across the state.

[By 1981] Marine Midland Bank N.A. accomplished that goal and has gone even further. It was the nation's 13th largest commercial bank with about 300 banking offices in more than New York communities and about 25 offices in foreign countries.

### History

Marine Bank was founded as a state-chartered bank on July 10, 1850, with capital of \$170,000. Palmer was elected president and Ganson was named cashier.

The new institution was called Marine Bank because much of its early business depended on the economic vitality of the city's lakefronts and riverfronts. From the first day it opened its doors on August 27 at 79 Main Street, Marine was the prominent bank for the thriving grain and milling industry on the waterfront.

By the start of the 20th century, Marine Bank of Buffalo began to expand through merger. In 1897 it absorbed the American Exchange Bank and in 1902 it acquired the Buffalo Commercial Bank. That same year it became a national bank and changed its name to Marine National Bank of Buffalo.

Marine Midland Bank, N.A. (1980–1999)

Marine Midland Banks Inc (1929–1995)  
HSBC Americas (1995–1999)



<b>Former type</b>	NYSE MM 1920–1987 Subsidiary of HSBC Holdings plc 1987–1999
<b>Industry</b>	Finance and Insurance
<b>Fate</b>	Acquired by HSBC, 51% 1980 and 100% 1987 renamed HSBC Bank USA 1999
<b>Founded</b>	July 10, 1850
<b>Defunct</b>	March 29, 1999
<b>Headquarters</b>	Buffalo, NY, United States
<b>Key people</b>	Malcom Burnett, President and CEO
<b>Products</b>	Financial Services
<b>Slogan</b>	Let's work it out together
<b>Website</b>	<a href="http://www.us.hsbc.com">http://www.us.hsbc.com</a>

EXHIBIT B – 8  
OCWEN ESTABLISHED  
OCWEN IN WIKIPEDIA

1/18/2015

Ocwen - Wikipedia, the free encyclopedia

## Ocwen

From Wikipedia, the free encyclopedia

**Ocwen Financial Corporation** is a provider of residential and commercial mortgage loan servicing, special servicing and asset management services. Ocwen is headquartered in Dunwoody, Georgia, with additional offices in West Palm Beach, Orlando, Florida, Houston, Texas, St. Croix, U.S. Virgin Islands and Washington, D.C.. It also has support operations in Philippines, Uruguay and India.<sup>[1]</sup>

### Contents

- 1 Corporate Affairs
  - 1.1 Key Acquisitions
  - 1.2 Making Home Affordable Program
  - 1.3 Altisource Spin-Off
  - 1.4 Home Loan Servicing Solutions Spin-Off
- 2 Employees
- 3 Controversies
- 4 References
- 5 External links

### Ocwen Financial Corporation Limited



<b>Type</b>	Public
<b>Traded as</b>	NYSE: OCN ( <a href="https://www.nyse.com/quote/XNYS:OCN">https://www.nyse.com/quote/XNYS:OCN</a> )
<b>Industry</b>	Financial Services (Mortgage)
<b>Founded</b>	February 1988
<b>Headquarters</b>	Dunwoody, Georgia (Atlanta mailing address)
<b>Key people</b>	William C. Erbey (Executive Chairman) Ronald M. Faris (President and CEO)
<b>Revenue</b>	<span>▲</span> US\$ 18.0 Billion 513.7 Million (Q3 2014)
<b>Net income</b>	<span>▲</span> US\$ 58.7 Million (Q3 2014)
<b>Number of employees</b>	15,610 (December 2014)
<b>Website</b>	Ocwen.com ( <a href="http://www.ocwen.com/">http://www.ocwen.com/</a> )

## Corporate Affairs

Ocwen is licensed to service mortgage loans in all 50 states, the District of Columbia and two U.S. territories. Ocwen has been servicing residential mortgage loans since 1988 and subprime mortgage loans since 1994.

As of 2010, Ocwen's subprime servicing volume was \$56 billion, ranking it fourth in subprime servicing behind American Home Servicing (\$78 billion), Bank of America/Countrywide (\$82 billion) and Chase Home Finance (\$90 billion).<sup>[2]</sup> As of December 31, 2011, Ocwen had serviced 671,623 residential loans

EXHIBIT B – 8 cont'd.  
 OCWEN ESTABLISHED  
 OCWEN SEC FILING

1/18/2015

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U.S. Securities and Exchange Commission

EDGAR Search Results

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OCWEN FINANCIAL CORP CIK#: 0000873860 (see all company filings)

SIC: 6162 - MORTGAGE BANKERS & LOAN CORRESPONDENTS  
 State location: 2Q | State of Inc.: GA | Fiscal Year End: 1231  
 (Assistant Director Office: 7)  
 Get [insider transactions](#) for this issuer.

Business Address  
 1000 ABERNATHY  
 ROAD NE  
 SUITE 210  
 ATLANTA 2Q 30328  
 661-662-8000

Mailing Address  
 1000 ABERNATHY  
 ROAD NE  
 SUITE 210  
 ATLANTA 2Q 30328

Filter Results:  Filing Type:  Prior to: (YYYYMMDD)  Ownership?  Include  exclude  only Limit Results Per Page

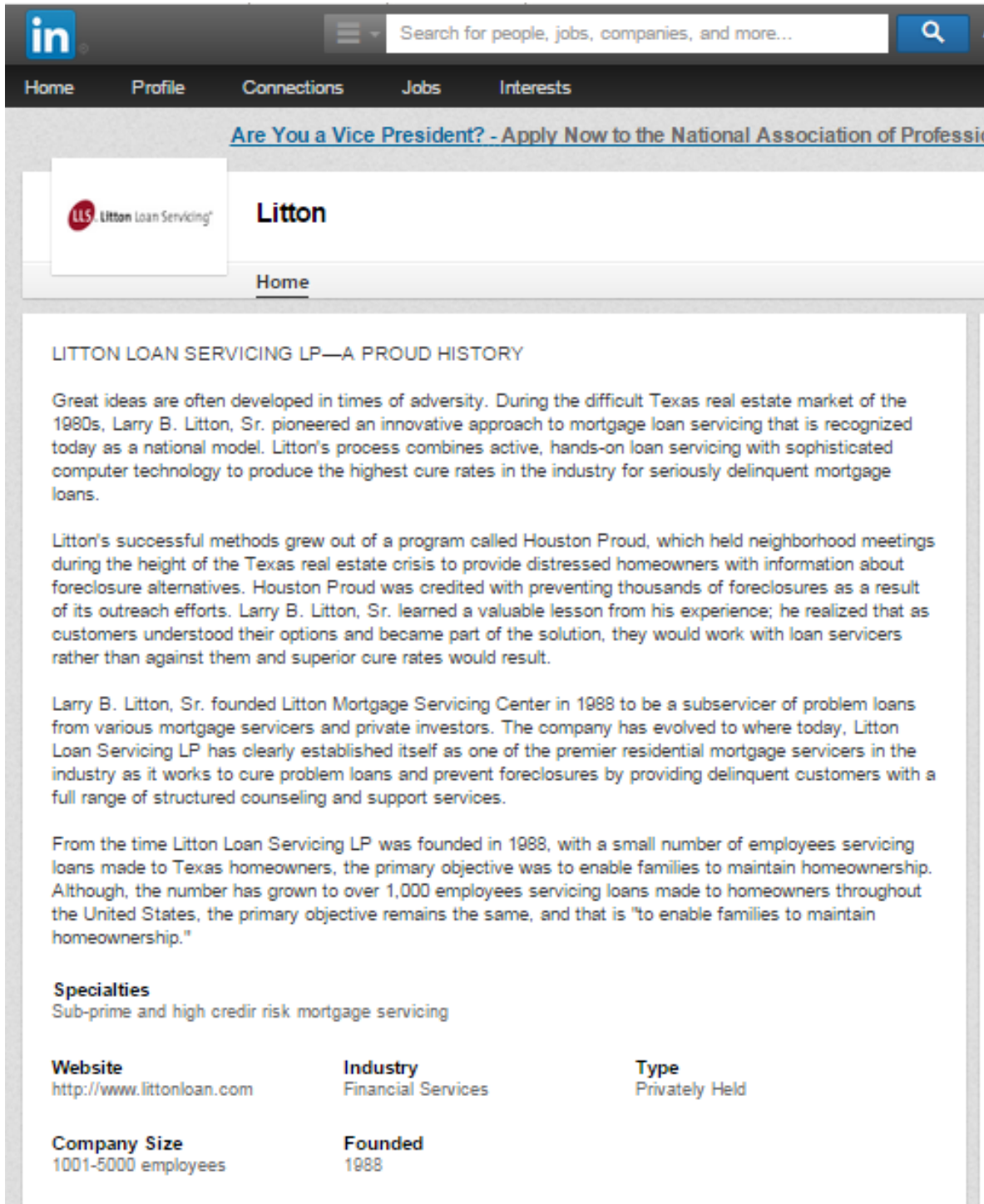
Items 81 - 87 [RSS Feed](#)

[Previous 40](#)

Filing	Format	Description	Filing Date	File/Film Number
424B1	Documents	Prospectus [Rule 424(b)(1)] Acc-no: 0000912057-96-021154 Size: 1 MB	1996-09-25	333-05153 96634497
S-1/A	Documents	[Amend]General form for registration of securities under the Securities Act of 1933 Acc-no: 0000912057-96-021067 Size: 1 MB	1996-09-25	333-05153 96634057
S-1/A	Documents	[Amend]General form for registration of securities under the Securities Act of 1933 Acc-no: 0000912057-96-020966 Size: 1 MB	1996-09-24	333-05153 96633518
S-A12G	Documents	Registration of securities [Section 12(g)] Acc-no: 0001002124-96-000032 Size: 3 KB	1996-09-11	000-21341 96628732
S-1/A	Documents	[Amend]General form for registration of securities under the Securities Act of 1933 Acc-no: 0000912057-96-019551 Size: 1 MB	1996-09-05	333-05153 96625891
S-1/A	Documents	[Amend]General form for registration of securities under the Securities Act of 1933 Acc-no: 0000912057-96-018457 Size: 1 MB	1996-08-21	333-05153 96618712
S-1	Documents	General form for registration of securities under the Securities Act of 1933 Acc-no: 0000912057-96-011496 Size: 811 KB	1996-06-04	333-05153 96576539

[Previous 40](#)

**EXHIBIT B – 9**  
**LITTON LOAN ESTABLISHED**



The image is a screenshot of a LinkedIn profile page for Litton Loan Servicing LP. At the top, there is a navigation bar with the LinkedIn logo, a search bar, and links for Home, Profile, Connections, Jobs, and Interests. Below the navigation bar, there is a banner with the text "Are You a Vice President? - Apply Now to the National Association of Professional..." and the Litton Loan Servicing logo. The main content area features the title "LITTON LOAN SERVICING LP—A PROUD HISTORY" followed by three paragraphs of text describing the company's history and mission. Below the text, there are sections for "Specialties", "Website", "Industry", "Type", "Company Size", and "Founded".

**LITTON LOAN SERVICING LP—A PROUD HISTORY**

Great ideas are often developed in times of adversity. During the difficult Texas real estate market of the 1980s, Larry B. Litton, Sr. pioneered an innovative approach to mortgage loan servicing that is recognized today as a national model. Litton's process combines active, hands-on loan servicing with sophisticated computer technology to produce the highest cure rates in the industry for seriously delinquent mortgage loans.

Litton's successful methods grew out of a program called Houston Proud, which held neighborhood meetings during the height of the Texas real estate crisis to provide distressed homeowners with information about foreclosure alternatives. Houston Proud was credited with preventing thousands of foreclosures as a result of its outreach efforts. Larry B. Litton, Sr. learned a valuable lesson from his experience; he realized that as customers understood their options and became part of the solution, they would work with loan servicers rather than against them and superior cure rates would result.

Larry B. Litton, Sr. founded Litton Mortgage Servicing Center in 1988 to be a subservicer of problem loans from various mortgage servicers and private investors. The company has evolved to where today, Litton Loan Servicing LP has clearly established itself as one of the premier residential mortgage servicers in the industry as it works to cure problem loans and prevent foreclosures by providing delinquent customers with a full range of structured counseling and support services.

From the time Litton Loan Servicing LP was founded in 1988, with a small number of employees servicing loans made to Texas homeowners, the primary objective was to enable families to maintain homeownership. Although, the number has grown to over 1,000 employees servicing loans made to homeowners throughout the United States, the primary objective remains the same, and that is "to enable families to maintain homeownership."

**Specialties**  
Sub-prime and high credit risk mortgage servicing

<b>Website</b> http://www.littonloan.com	<b>Industry</b> Financial Services	<b>Type</b> Privately Held
<b>Company Size</b> 1001-5000 employees	<b>Founded</b> 1988	

EXHIBIT B – 10  
 ENHANCE FINANCIAL SERVICES GROUP  
 SEC Filings



Home | Latest Filings | Previous Pa

U.S. Securities and Exchange Commissio

EDGAR Search Results

EDGAR Search Results  
 BETA View

SEC Home » Search the Next-Generation EDGAR System » Company Search » Current Page

**ENHANCE FINANCIAL SERVICES GROUP INC CIK#: 0000881889 (see all company filings)**

SIC: 6399 - INSURANCE CARRIERS, NEC State location: NY   State of Inc.: NY   Fiscal Year End: 1231 (Assistant Director Office: 1)	Business Address 335 MADISON AVE NEW YORK NY 10017 2129833100	Mailing Address 335 MADISON AVENUE 25TH FLOOR NEW YORK NY 10017
-----------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------	--------------------------------------------------------------------------

Filter Results: Filing Type:  Prior to: (YYYYMMDD)  Ownership?  include  exclude  only Limit Results Per Page 40 Entries

Items 1 - 40 [RSS Feed](#)

Filings	Format	Description	Filing Date	File/Film Number
25	<a href="#">Documents</a>	[Paper]Notification of the removal from listing and registration of matured, redeemed or retired securities Acc-no: 999999997-03-018186 Size: 1 KB	2003-04-07	001-10967 03018133
SC 13G/A	<a href="#">Documents</a>	[Amend]Statement of acquisition of beneficial ownership by individuals Acc-no: 0000869906-02-000113 Size: 8 KB	2002-02-14	005-42278 02546181
SC 13G/A	<a href="#">Documents</a>	[Amend]Statement of acquisition of beneficial ownership by individuals Acc-no: 0000810868-01-000185 Size: 8 KB	2001-03-14	005-42278 1567968
SC 13G/A	<a href="#">Documents</a>	[Amend]Statement of acquisition of beneficial ownership by individuals Acc-no: 0000928598-01-500066 Size: 22 KB	2001-03-14	005-42278 1568235
15-12B	<a href="#">Documents</a>	Securities registration termination [Section 12(b)] Acc-no: 0000898822-01-000271 Size: 4 KB	2001-03-13	001-10967 1567565
425	<a href="#">Documents</a>	Prospectuses and communications, business combinations Acc-no: 0000898822-01-000221 Size: 7 KB	2001-03-01	001-10967 1558343

**EXHIBIT B – 11**  
**ENHANCED FINANCIAL SERVICES & LITTON LOAN**

Excerpt from [EDGAR Archives 1129638 000105117001500267](#) EFSG-LittonLoan.docx & [EDGAR 0001051170-01-500260](#) EFSG-LittonLoan.docx

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM 10-K/A

[X] Annual report pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the fiscal year ended December 31, 2000

[ ] Transition report pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the transition period from to

Commission File Number 333-32857-03

ASSET BACKED FUNDING CORPORATION  
(Exact name of registrant as specified in its charter)

Delaware (State or other jurisdiction of incorporation) 75-2533468 (IRS Employer Identification No.)

100 North Tryon Street  
Charlotte, North Carolina (Address of principal executive offices) 28255 (Zip Code)

Registrant's telephone number, including area code : (704) 386-2400

**C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB2**  
(Title of each class of securities covered by this Form)

Securities registered pursuant to Section 12(b) of the Act: None  
Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes [X] No [ ]

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K/A or any amendment to this Form 10-K/A. [X]

Documents incorporated by reference: None  
<PAGE>

AMENDMENT NUMBER 1 OF 1  
-2-

<page>

ASSET BACKED FUNDING CORPORATION  
C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB2  
-----

PART IV

Item 14. Exhibits, Financial Statement Schedules and Reports on Form 8-K

(a) The following documents are filed as part of this report:

- (1) Financial Statements:  
Omitted.
- (2) Financial Statement Schedules:  
Omitted.
- (3) Exhibits:



Annual Servicer Statements of Compliance, filed as Exhibit 99.1 hereto.  
Annual Statement of Independent Accountants Report for the Servicer,  
filed as Exhibit 99.2 hereto.

(b) Reports on Form 8-K: The following Current Reports on Form 8-K were  
filed by the Registrant during the last quarter of 2000.

Current Reports on Form 8-K, dated October 25, 2000, November 27,  
2000, and December 26, 2000, were filed for the purpose of filing the  
Monthly Statement sent to the Holders of the Offered Certificates for  
payments made on the same dates. The items reported in such Current Report  
were Item 5 (Other Events).

(c) Exhibits to this report are listed in Item (14)(a)(3) above.

-3-

<PAGE>

SIGNATURE

Pursuant to the requirements of Section 13 or 15(d) of the Securities Exchange  
Act of 1934, the registrant has duly caused this report to be signed on its  
behalf by the undersigned thereunto duly authorized.

THE CHASE MANHATTAN BANK,  
not in its individual capacity but solely  
as Trustee under the Agreement referred  
to herein

Date: December 13, 2001

By: /s/ Karen Schluter  
Karen Schluter  
Assistant Vice President

-4-

<PAGE>

EXHIBIT INDEX

Exhibit	Description
99.1	Servicer's Annual Statements of Compliance
99.2	Servicer's Annual Independent Accountant's Report

-5-

EXHIBIT 99.1 - Servicer's Annual Statement of Compliance

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<page>

LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.

5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

Litton Loan Servicing LP  
Compliance Certification Year Ended December 31, 2000  
C-BASS, Series 2000-CB2

The undersigned Officer of Litton Loan Servicing LP certifies that for the  
year ended December 31, 2000, Litton has complied with Section 3.27 of the  
Pooling and Servicing Agreement by and between Asset Backed Funding Corporation,  
Inc., as Depositor, Credit-Based Asset Servicing and Securitization LLC, as  
seller, The Chase Manhattan Bank, as Trustee and Litton Loan Servicing LP, as  
Servicer, dated May 1, 2000, as they relate to the Internal Revenue Service  
Information reporting requirements including those under Sections 6050J.

By: /s/ Janice McClure Dated: May 8, 2001  
Janice McClure  
Senior Vice President

State of Texas

County of Harris

On May 8, 2001, before me a Notary Public in and for said state, personally

appeared Janice McClure of Litton Loan Servicing LP, personally known to me to be the person whose name is subscribed to the within the instrument and acknowledged to me that he executed that same in his authorized capacity, and that by his signature on the instrument, the entity upon behalf of which the person acted executed the instrument.

WITNESS my hand and official seal.

/s/ Laurie Struecker  
Laurie Struecker  
Notary Public  
State of Texas  
My Comm. Exp 02-04-2002

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<page>

LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.

5373 West Alabama, Suite 600  
Houston, Texas 77056

Telephone 713.960.9676  
Fax 713.966.8856

March 30, 2001

Karen Schluter  
The Chase Manhattan Bank  
450 West 33rd Street, 14th floor  
New York, New York 10001-2697

Subject: C-BASS 2000-CB2

To Whom it May Concern:

The undersigned officer of Litton Loan Servicing LP (successor in interest to Litton Loan Servicing, Inc.) certifies that a review of the servicing activity for the year ended December 31, 2000 has been completed and that there were no defaults or exceptions to the requirements of the subject agreement between the above-listed parties. Litton Loan Servicing LP hereby certifies that:

1. All ad valorem taxes have been paid when due and without penalty to the Trust.
2. All assessments and ground rents of whatsoever kind or nature have been paid so as to prevent their taking priority to the purchase money lien or lien to which the trust is entitled.
3. All casualty insurance has been paid without lapse in coverage and in an amount sufficient to prevent the application of a co-insurance clause.
4. In compliance with terms of the agreement, flood insurance as required by the National Flood Insurance Act of 1994, P.L. 103-325 §511, if any, has been maintained without lapse.
5. Errors and Omissions Insurance is in forced in amounts sufficient to meet the requirements of Federal National Mortgage Association, Federal Home Loan Mortgage Corporation and the terms of the subject agreement.
6. Litton Loan Servicing LP has timely filed the required IRS informational returns including the forms 1098, 1099(A), and those required by code sections 6050(h)(j)(p) for the year ended December 31, 2000.
7. Litton Loan Servicing LP has not committed any act or omitted to act in any manner that would cause the trust to lose the REMIC tax treatment or be taxed on prohibited transaction.
8. All other items and requirements of the Servicing Agreement between the above parties have been complied with except as noted on the attachment to this letter if any.

Sincerely,

Litton Loan Servicing LP

/s/ Janice McClure  
Janice McClure  
Senior Vice President

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LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.

5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

January 12, 2001

As of December 31, 2000, Litton Loan Servicing LP has complied in all material respects with the minimum servicing set forth in the Mortgage Bankers Association of America's Uniform Single Attestation Program for Mortgage Bankers. As of and for this same period, Litton Loan Servicing LP had in effect a fidelity bond in the amount of \$10,000,000 and an errors and omissions policy in the amount of \$10,000,000.

/s/ Larry B. Litton, Sr.  
Larry B. Litton, Sr., President & CEO

/s/ Janice McClure  
Janice McClure, Senior Vice President

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EXHIBIT 99.2 - Servicer's Annual Independent Accountant's Report

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Deloitte & Touche LLP  
Suite 2300  
333 Clay Street  
Houston, Texas 77002

INDEPENDENT AUDITORS' REPORT

To the Partners of  
Litton Loan Servicing LP:

We have examined management's assertion about Litton Loan Servicing LP's (the "Company") compliance with the minimum servicing standards identified in the Mortgage Bankers Association of America's Uniform Single Attestation Program for Mortgage Bankers as of and for the year ended December 31, 2000, included in the accompanying management assertion. Management is responsible for the Company's compliance with those minimum servicing standards. Our responsibility is to express an opinion on management's assertion about the Company's compliance based on our examination.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about the Company's compliance with minimum servicing standards and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. **Our examination does not provide a legal determination of the Company's compliance with the minimum servicing standards.**

In our opinion, management's assertion that the Company complied with the aforementioned minimum servicing standards as of and for the year ended December 31, 2000 is fairly stated, in all material respects.

January 12, 2001

**EDGAR [0001051170-01-500260](#) EFSG-LittonLoan.docx**

ACCESSION NUMBER: 0001051170-01-500260  
CONFORMED SUBMISSION TYPE: 10-K/A  
PUBLIC DOCUMENT COUNT: 1  
CONFORMED PERIOD OF REPORT: 20001231  
FILED AS OF DATE: 20011214

FILER:

COMPANY DATA:

COMPANY CONFORMED NAME: PRUDENTIAL SEC C BASS MTG LN ASSET BKD CERT SER 2000-CB3  
CENTRAL INDEX KEY: 0001129640  
STANDARD INDUSTRIAL CLASSIFICATION: ASSET-BACKED SECURITIES [6189]

FISCAL YEAR END: 1231

FILING VALUES:  
FORM TYPE: 10-K/A  
SEC ACT: 1934 Act  
SEC FILE NUMBER: 333-37256-01  
FILM NUMBER: 1813293

BUSINESS ADDRESS:  
STREET 1: ONE NEW YORK PLAZA  
CITY: NEW YORK  
STATE: NY  
ZIP: 10292

MAIL ADDRESS:  
STREET 1: ONE NEW YORK PLAZA  
STREET 2: ONE NEW YORK PLAZA  
CITY: NEW YORK  
STATE: NY  
ZIP: 10292

</SEC-HEADER>  
<DOCUMENT>  
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<SEQUENCE>1  
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<DESCRIPTION>12/31/00  
<TEXT>

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM 10-K/A

Annual report pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the fiscal year ended December 31, 2000

Transition report pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the transition period from to

Commission File Number: 333-37256-01

PRUDENTIAL SECURITIES SECURED FINANCING CORPORATION  
(Exact name of registrant as specified in its charter)

Delaware (State or other jurisdiction of incorporation) 56-2064715 (IRS Employer Identification No.)

One New York Plaza  
New York, New York 10292  
(Address of principal executive offices) (Zip Code)

Registrant's telephone number, including area code : (212) 778-1000

C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB3  
(Title of each class of securities covered by this Form)

Securities registered pursuant to Section 12(b) of the Act: None  
Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes  No

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K/A or any amendment to this Form 10-K/A.

Documents incorporated by reference: None  
<PAGE>

AMENDMENT NUMBER 1 OF 1

<PAGE>

PRUDENTIAL SECURITIES SECURED FINANCING CORPORATION  
C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB3

-----  
PART IV

Item 14. Exhibits, Financial Statement Schedules and Reports on Form 8-K

(a) The following documents are filed as part of this report:

- (1) Financial Statements:  
Omitted.
- (2) Financial Statement Schedules:  
Omitted.
- (3) Exhibits:

Annual Servicer Statements of Compliance, filed as Exhibit 99.1 hereto.  
Annual Statement of Independent Accountants Report for the Servicer,  
filed as Exhibit 99.2 hereto.

(b) Reports on Form 8-K: The following Current Reports on Form 8-K were  
filed by the Registrant during the last quarter of 2000.

Current Reports on Form 8-K, dated October 25, 2000, November 27,  
2000, and December 26, 2000, were filed for the purpose of filing the  
Monthly Statement sent to the Holders of the Offered Certificates for  
payments made on the same dates. The items reported in such Current Report  
were Item 5 (Other Events).

(c) Exhibits to this report are listed in Item (14)(a)(3) above.

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SIGNATURE

Pursuant to the requirements of Section 13 or 15(d) of the Securities Exchange  
Act of 1934, the registrant has duly caused this report to be signed on its  
behalf by the undersigned thereunto duly authorized.

THE CHASE MANHATTAN BANK,  
not in its individual capacity but solely  
as Trustee under the Agreement referred  
to herein

Date: December 13, 2001

By: /s/ Karen Schluter  
Karen Schluter  
Trust Officer

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EXHIBIT INDEX

Exhibit	Description
99.1	Servicer's Annual Statements of Compliance
99.2	Servicer's Annual Independent Accountant's Report

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EXHIBIT 99.1 - Servicer's Annual Statement of Compliance

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LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.

5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

Litton Loan Servicing LP  
Compliance Certification Year Ended December 31, 2000  
C-BASS, Series 2000-CB3

The undersigned Officer of Litton Loan Servicing LP certifies that for the  
year ended December 31, 2000, Litton has complied with Section 3.27 of the  
Pooling and Servicing Agreement by and between Prudential Securities Secured  
Financial Corporation, as Depositor, Credit-Based Asset Servicing and  
Securitization LLC, as seller, The Chase Manhattan Bank, as Trustee and Litton  
Loan Servicing LP, as Servicer, dated August 1, 2000, as they relate to the  
Internal Revenue Service Information reporting requirements including those  
under Sections 6050J.

By: /s/ Janice McClure Dated: May 8, 2001  
Janice McClure  
Senior Vice President

State of Texas

County of Harris

On May 8, 2001, before me a Notary Public in and for said state, personally appeared Janice McClure of Litton Loan Servicing LP, personally known to me to be the person whose name is subscribed to the within the instrument and acknowledged to me that he executed that same in his authorized capacity, and that by his signature on the instrument, the entity upon behalf of which the person acted executed the instrument.

WITNESS my hand and official seal.

/s/ Laurie Struecker  
Laurie Struecker  
Notary Public  
State of Texas  
My Comm. Exp 02-04-2002

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<page>

LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.

5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

March 30, 2001

Karen Schluter  
The Chase Manhattan Bank  
450 West 33rd Street, 14th floor  
New York, New York 10001

Subject: C-BASS Trust 2000-CB3

To Whom it May Concern:

The undersigned officer of Litton Loan Servicing LP (successor in interest to Litton Loan Servicing, Inc.) certifies that a review of the servicing activity for the year ended December 31, 2000 has been completed and that there were no defaults or exceptions to the requirements of the subject agreement between the above-listed parties. Litton Loan Servicing LP hereby certifies that:

1. All ad valorem taxes have been paid when due and without penalty to the Trust.
2. All assessments and ground rents of whatsoever kind or nature have been paid so as to prevent their taking priority to the purchase money lien or lien to which the trust is entitled.
3. All casualty insurance has been paid without lapse in coverage and in an amount sufficient to prevent the application of a co-insurance clause.
4. In compliance with terms of the agreement, flood insurance as required by the National Flood Insurance Act of 1994, P.L. 103-325 §511, if any, has been maintained without lapse.
5. Errors and Omissions Insurance is in forced in amounts sufficient to meet the requirements of Federal National Mortgage Association, Federal Home Loan Mortgage Corporation and the terms of the subject agreement.
6. Litton Loan Servicing LP has timely filed the required IRS informational returns including the forms 1098, 1099(A), and those required by code sections 6050(h)(j)(p) for the year ended December 31, 2000.
7. Litton Loan Servicing LP has not committed any act or omitted to act in any manner that would cause the trust to lose the REMIC tax treatment or be taxed on prohibited transaction.
8. All other items and requirements of the Servicing Agreement between the above parties have been complied with except as noted on the attachment to this letter if any.

Sincerely,

Litton Loan Servicing LP

/s/ Janice McClure  
Janice McClure  
Senior Vice President

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<page>

LITTON LOAN SERVICING, LP  
An affiliate of C-Bass

5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

January 12, 2001

As of December 31, 2000, Litton Loan Servicing LP has complied in all material respects with the minimum servicing set forth in the Mortgage Bankers Association of America's Uniform Single Attestation Program for Mortgage Bankers. As of and for this same period, Litton Loan Servicing LP had in effect a fidelity bond in the amount of \$10,000,000 and an errors and omissions policy in the amount of \$10,000,000.

/s/ Larry B. Litton, Sr.  
Larry B. Litton, Sr., President & CEO

/s/ Janice McClure  
Janice McClure, Senior Vice President

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EXHIBIT 99.2 - Servicer's Annual Independent Accountant's Report

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Deloitte & Touche LLP  
Suite 2300  
333 Clay Street  
Houston, Texas 77002

#### INDEPENDENT AUDITORS' REPORT

To the Partners of  
Litton Loan Servicing LP:

We have examined management's assertion about Litton Loan Servicing LP's (the "Company") compliance with the minimum servicing standards identified in the Mortgage Bankers Association of America's Uniform Single Attestation Program for Mortgage Bankers as of and for the year ended December 31, 2000, included in the accompanying management assertion. Management is responsible for the Company's compliance with those minimum servicing standards. Our responsibility is to express an opinion on management's assertion about the Company's compliance based on our examination.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about the Company's compliance with minimum servicing standards and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination of the Company's compliance with the minimum servicing standards.

In our opinion, management's assertion that the Company complied with the aforementioned minimum servicing standards as of and for the year ended December 31, 2000 is fairly stated, in all material respects.

January 12, 2001

EXHIBIT B – 12  
MONEY TRAIL

# AMERICAN BANKER

THE FINANCIAL SERVICES DAILY

Thursday, June 22, 2006

## C-Bass Founder Has New Gig at Fortress

■ BY MARC HOCHSTEIN

Tony Ettinger, who in the 1990s helped start two specialists in distressed consumer loans, has joined the New York private equity firm Fortress Investment Group LLC as a managing director in charge of forming joint ventures.

As *American Banker* reported in April, Mr. Ettinger had been hunting private equity capital to build a servicer that would specialize in identifying borrowers in trouble and working out a modification or repayment plan for them before they default.

In an interview Wednesday, he said he had received "a flurry of interest" in the idea, and the project may yet come to fruition. He is "trying to sort it through right now," he said, and to figure out what makes sense for Fortress and how to deal fairly with the handful of employees at Credit-Based Capital, the Chappaqua, N.Y., firm he started in August of last year.

Mr. Ettinger, 49, said he got a phone call a couple of weeks ago from Peter L. Briger Jr., one of the principals at Fortress, who suggested that instead of "doing one deal for yourself, come



Ettinger: A principal "made it attractive, and the next day I joined."

here and do a bunch of them. He made it attractive, and the next day I joined."

Fortress, which manages \$21 billion of investments, was part of the consortium that bought the manufactured housing finance operations of Conseco Inc. for \$850 million in 2003. This year a Fortress-managed fund agreed to buy the Dallas home builder Centex Corp.'s nonprime lending unit for \$575 million. The lender will be renamed Nationstar Mortgage LLC when the deal closes, which is expected to happen this summer.

In 1996, Mr. Ettinger founded C-Bass LLC with veterans of Citicorp Securities' mortgage trading desk. The bond insurer Enhance Financial Services Group Inc., where Mr. Ettinger was an executive vice president, put up half the capital; the Milwaukee mortgage insurer MGIC Investment Corp. put up the other half.

C-Bass, based in New York, buys and securitizes subprime and nonperforming loans and services them through its Houston unit Litton Loan Servicing LP.

Two years later Mr. Ettinger set up another New York joint venture between Enhance and MGIC: Sherman Financial Group, which buys unsecured consumer debt such as charged-off credit card and Chapter 13 bankruptcy receivables. Radian Group Inc. of Philadelphia bought Enhance in 2001, and Mr. Ettinger retired.

In 2003 he joined Maple Financial Group Inc., an \$18 billion-asset company based in Toronto, where he ran the commercial finance business.

He said the investments he works on for Fortress will involve "a full array of assets that are attractive from a risk-return perspective" — both consumer and commercial. ■



**EXHIBIT B – 12 cont'd.**  
**MONEY TRAIL**

***Profile by Standard & Poors***

Founded in 1988 by its current director, Larry Litton Sr., the company initially serviced prime mortgage loans and eventually migrated to distressed assets for the Resolution Trust Corp. (RTC). Applying the significant amount of expertise gained through these RTC contracts, management decided to focus its future business efforts on resolving seriously delinquent mortgages. In 1996, Litton was added to a newly formed investment company, C-BASS, as part of an initial investment made by Enhance Financial Services, its owner at the time. Enhance, which later was purchased by Radian Group Inc. (Radian), co-invested in C-BASS with MGIC Investment Corp. (MGIC) in July 1996 to form C-BASS LLC. MGIC and Radian each owned a 42% interest in C-BASS LLC, with the remainder owned by C-BASS senior management. C-BASS was a large purchaser of credit-sensitive assets, which consisted primarily of subprime mortgages. As an outgrowth of this strategy, Litton began servicing subprime accounts in 1998. Due to liquidity pressures, C-BASS LLC sold Litton to Goldman Sachs Group Inc. in December 2007. Previously, Litton was a division of the parent's industrial bank chartered in Utah, but it was realigned to become a division of Goldman Sachs Bank USA (GS Bank), which is state-chartered in New York. Management reports to an operational reporting committee of the bank. <http://www.standardandpoors.com/ratings/articles/en/us/%3FassetID%3D1245205476943> Publication date: 27-Jan-2010 11:00:04 EST

**EXHIBIT B – 13**  
**OCWEN SEC FILING**

Excerpt from EDGAR\_0000912057-96-011496\_Ocwen-filing.docx

SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

-----  
FORM S-1  
REGISTRATION STATEMENT  
UNDER  
THE SECURITIES ACT OF 1933

**OCWEN FINANCIAL CORPORATION**

-----  
(Exact name of registrant as specified in its articles of incorporation)

Florida 6712,6035 65-0039856

-----  
(State or other jurisdiction of incorporation or organization) (Primary Standard Industrial Classification Code Number) (I.R.S. Employer Identification No.)

The Forum, Suite 1000  
1675 Palm Beach Lakes Blvd.  
West Palm Beach, Florida 33401  
(561) 681-8000

-----  
(Address, including zip code, and telephone number, including area code, of registrant's principal executive offices)

William C. Erbey  
President and Chief Executive Officer  
Ocwen Financial Corporation  
The Forum, Suite 1000  
1675 Palm Beach Lakes Blvd.  
West Palm Beach, Florida 33401  
(561) 681-8000

-----  
(Name, address, including zip code, and telephone number, including area code, of agent for service)

+++++

THE COMPANY

GENERAL

The Company is a financial services company which is primarily engaged in the acquisition and resolution of troubled loans and in diverse mortgage lending activities. The activities of the Company are primarily conducted through Berkeley Federal Bank & Trust FSB (the "Bank"), a federally-chartered savings bank and a wholly-owned subsidiary of the Company. At March 31, 1996, the Company had \$1.9 billion of total assets and stockholders' equity of \$142.1 million.

The Company's business strategy focuses on the identification and development of selected business lines that provide the highest return consistent with prudent risk management. This strategy has resulted in significant profitability in recent years. Exclusive of gains from the sale of branch offices and related income taxes and profit sharing expense, the

Company's income from continuing operations before extraordinary gain and cumulative effect of a change in accounting principle resulted in returns on average assets of 2.00%, 1.40% and 2.37% during 1995, 1994 and 1993, respectively, and returns on average equity of 25.02%, 20.06% and 27.89% during the same respective periods.

+++++

BUSINESS ACTIVITIES

DISCOUNTED LOAN ACQUISITION AND RESOLUTION ACTIVITIES. The Company has established a core expertise in the acquisition and resolution of non-performing or underperforming single-family residential, multi-family residential and commercial real estate loans, which generally are purchased at a discount to both the unpaid principal amount of the loan and the estimated value of the security property ("discounted loans"). The Company acquires discounted loans from a wide variety of sources, which in recent years have been primarily from the private sector and, to a lesser extent, governmental agencies. The Company believes that its experience in the acquisition and resolution of discounted loans, its investment in a state-of-the-art computer infrastructure and related technology which is utilized in this business and its national reputation and nationwide presence in this area make it one of the leaders in this relatively new and evolving business. Between commencing these activities in mid-1991 and March 31, 1996, the Company acquired over \$2.3 billion of gross principal amount of discounted loans, including \$791.2 million and \$826.4 million during 1995 and 1994, respectively. Recently, the Company formed a joint venture with an institutional investor that successfully bid to acquire \$679.3 million gross principal amount of discounted single-family residential loans (net of concurrent sales of loans) from the Federal Housing Administration ("FHA") of the U.S. Department of Housing and Urban Development ("HUD"), which was consummated in April 1996. At March 31, 1996, the Company's discounted loan portfolio amounted to \$606.4 million, net of \$239.8 million of unaccreted discount and an \$8.2 million allowance for loan losses, or 32.2% of the Company's total assets.

+++++

SINGLE-FAMILY RESIDENTIAL LENDING ACTIVITIES. During 1995, the Company established a program which focuses on the origination or purchase on a nationwide basis of single-family residential loans made to borrowers who have substantial equity in the properties which secure the loans but who, because of prior credit problems, the absence of a credit history or other factors, are unable or unwilling to qualify as borrowers from traditional sources. The Company utilizes the expertise, technology and other resources which it has developed in connection with the acquisition and resolution of discounted loans in conducting these activities, and believes that the higher risk of default generally associated with these loans, as compared to loans which conform to the requirements established by federal agencies, is more than offset by the higher yields on these loans and the higher amount of equity which the borrowers have in the properties which secure these loans. The Company acquired \$70.2 million of single-family residential loans to non-conforming borrowers during the three months ended March 31, 1996 and \$240.3 million of such loans during 1995, \$158.6 million of which was acquired during the last half of the year. The Company classifies its single-family residential loans to non-conforming borrowers as available for sale because it generally intends to sell such loans or to securitize such loans and sell substantially all of the securities backed by such loans. During the three months ended March 31, 1996, the Company sold \$62.0 million of such loans for a pre-tax gain of \$901,000, and in April 1996 the Company entered into commitments to sell an additional \$88.4 million of such loans. At March 31, 1996, the Company's single-family residential loans to non-conforming borrowers amounted to \$208.7 million or 11.1% of the Company's total assets.

EXHIBIT B – 14  
HSBC ACQUIRED MARINE MIDLAND BANK



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U.S. Securities and Exchange Commission

EDGAR Search Results

[Search the Next-Generation EDGAR System](#)

[SEC Home](#) » [Search the Next-Generation EDGAR System](#) » [Company Search](#) » [Current Page](#)

Companies with names matching "MARINE MIDLAND BANK"  
[Click on CIK to view company filings](#)

Items 1 - 2

CIK	Company	State/Country
0000316905	HSBC BANK USA SIC: 6189 - ASSET-BACKED SECURITIES formerly: MARINE MIDLAND BANK/NY (filings through 1999-02-16)	NY
0000062348	HSBC USA INC SIC: 6022 - STATE COMMERCIAL BANKS formerly: HSBC AMERICAS INC (filings through 1999-03-26) MARINE MIDLAND BANKS INC (filings through 1996-05-13)	NY



Detailed Company Information




The following information was found for the selected company:

Company Name: MARINE MIDLAND BANK  
CIK: 0000062346  
IRS Number: 160539090  
Reporting File Number: 028-00750  
Regulated Entity Type:  
SIC Code:  
Address: 140 BROADWAY ONE MARINE MIDLAND CENTER  
BUFFALO, NEW YORK 14240  
Phone Number: 7168434043  
State of Incorporation: DELAWARE  
Fiscal Year End:  
Date of Last Update:

[Return to Search Results](#)

[Return to Search](#)

EXHIBIT B – 15  
 HSBC BANK USA



Home | Latest Filings | Previous Page  
 U.S. Securities and Exchange Commission

**EDGAR Search Results** EDGAR Search Results BETA View

SEC Home » Search the Next-Generation EDGAR System » Company Search » Current Page

**HSBC USA INC CIK#: 000062348 (see all company filings)**

SIC: 6022 - STATE COMMERCIAL BANKS  
 State location: NY | State of Inc.: DE | Fiscal Year End: 1231  
 formerly: HSBC AMERICAS INC (filings through 1999-03-26)  
 formerly: MARINE MIDLAND BANKS INC (filings through 1996-05-13)  
 (Assistant Director Office: 7)

Business Address: ONE HSBC CENTER, BUFFALO NY 14203, 7168412424  
 Mailing Address: ONE HSBC CENTER, BUFFALO NY 14203

Filter Results: Filing Type: Prior to: (YYYYMMDD) Ownership?  include  exclude  only Limit Results Per Page: 40 Entries Search Show All

Items 1 - 40 [RSS Feed](#) Next 40

Filings	Format	Description	Filing Date	File/Film Number
25-NSE	<a href="#">Documents</a>	Notification filed by national security exchange to report the removal from listing and registration of matured, redeemed or retired securities Acc-no: 0000876661-07-000225 (34 Act) Size: 3 KB	2007-02-22	033-10523 07641158
25-NSE	<a href="#">Documents</a>	Notification filed by national security exchange to report the removal from listing and registration of matured, redeemed or retired securities Acc-no: 0000876661-06-000877 (34 Act) Size: 3 KB	2006-11-01	033-10523 061179015
SC 13G/A	<a href="#">Documents</a>	<b>[Amend]</b> Statement of acquisition of beneficial ownership by individuals Acc-no: 0001193125-06-205298 (34 Act) Size: 61 KB	2006-10-10	005-20863 061136758
15-12G	<a href="#">Documents</a>	Securities registration termination [Section 12(g)] Acc-no: 0000903423-00-000024 Size: 4 KB	2000-01-10	000-20583 504184
8-K	<a href="#">Documents</a>	Current report, Item 5 Acc-no: 0000903423-00-000024 Size: 1 KB	2000-01-10	001-02940 504184

Excerpt from EDGAR\_0000950152-96-002905\_HSBC-BANK.docx

FILED AS OF DATE: 19960612

SROS: NONE

FILER:

COMPANY DATA:

COMPANY CONFORMED NAME: HSBC AMERICAS INC  
 CENTRAL INDEX KEY: 0000062348  
 STANDARD INDUSTRIAL CLASSIFICATION: STATE COMMERCIAL BANKS [6022]  
 IRS NUMBER: 221093160  
 STATE OF INCORPORATION: DE  
 FISCAL YEAR END: 1231

FILING VALUES:

FORM TYPE: S-3  
 SEC ACT: 1933 Act  
 SEC FILE NUMBER: 333-05801  
 FILM NUMBER: 96580009

BUSINESS ADDRESS:

STREET 1: ONE MARINE MIDLAND CTR  
 STREET 2: MARINE MIDLAND BANK 22ND FL  
 CITY: BUFFALO  
 STATE: NY  
 ZIP: 14203  
 BUSINESS PHONE: 7168412424

MAIL ADDRESS:

STREET 2: ONE MARINE MIDLAND CENTER 22ND FL  
 CITY: BUFFALO  
 STATE: NY  
 ZIP: 14203

FORMER COMPANY:

FORMER CONFORMED NAME: MARINE MIDLAND BANKS INC

DATE OF NAME CHANGE: 19920703

FORMER COMPANY:

FORMER CONFORMED NAME: MARINE MIDLAND CORP

DATE OF NAME CHANGE: 19680614

+++++

THE CORPORATION

HSBC Americas, Inc. (the "Corporation"), formerly Marine Midland Banks, Inc., is a New York State based bank holding company registered under the Bank Holding Company Act of 1956, as amended. At March 31, 1996, the Corporation, together with its subsidiaries, had assets of \$21.6 billion and employed approximately 8,300 full and part time employees.


All of the Corporation's common stock is owned by HSBC Holdings B.V., an indirect wholly owned subsidiary of HSBC Holdings plc ("HSBC"). HSBC, with assets of \$352 billion at December 31, 1995 and net income of approximately \$3.9 billion for the year ended December 31, 1995, is one of the world's largest banking groups. HSBC, the ultimate parent company of The Hongkong and Shanghai Banking Corporation Limited and Midland Bank plc, is an international banking and financial services organization with major commercial and investment banking franchises operating under long established names in Asia, Europe, North America and the Middle East. Principal executive offices of HSBC are located in London.

The Corporation's principal subsidiary, Marine Midland Bank (the "Bank"), which had assets of \$21.4 billion and deposits of \$16.9 billion at March 31, 1996, is supervised and routinely examined by the Superintendent of Banks of the State of New York and the Board of Governors of the Federal Reserve System (the "Board of Governors"). The Bank is a regional bank with a distinctive geographic franchise encompassing the entire State of New York. Selected banking products are offered on a national basis. The Bank is engaged in a general commercial banking business, offering a full range of banking products and services to corporations, institutions, governments and individuals. Through its affiliation with HSBC, the Bank offers its customers access to global markets and services. In turn, the Bank plays a role in the delivery and processing of other HSBC products.

The Corporation's reported results are consolidated with Concord Leasing, Inc. ("Concord") and Oleifera Investments, Ltd. ("Oleifera"). Concord, which provides equipment financing through secured loan and finance lease transactions, had assets of \$1.5 billion at December 31, 1994. Concord was merged with the Corporation on January 1, 1995 through the contribution of Concord's outstanding common stock held by HSBC Holdings, B.V. to the Corporation. The merger transaction was accounted for as a transfer of assets between companies under common control, with the assets and liabilities of Concord combined with those of the Corporation at their historical carrying values. Oleifera had assets of \$183 million at December 31, 1995. The assets of Oleifera were transferred to the Corporation on January 1, 1996 through a transaction involving the contribution of common stock held by HSBC Holdings, B.V. to the Corporation. The transaction was

accounted for as a transfer of assets between companies under common control. The Corporation's consolidated financial statements set forth in the June 5th 8-K reflect a restatement of all prior periods to include the accounts and results of operations of Oleifera as though the transaction occurred as of the beginning of the earliest period presented.

EXHIBIT B – 16  
 ENHANCE FINANCIAL SERVICES GROUP



Home | Latest Filings | Previous Page  
 U.S. Securities and Exchange Commission

**EDGAR Search Results** **EDGAR** Search Results  
BETA View

SEC Home » Search the Next-Generation EDGAR System » Company Search » Current Page

**ENHANCE FINANCIAL SERVICES GROUP INC CIK#: 0000881889 (see all company filings)**

SIC: 6399 - INSURANCE CARRIERS, NEC  
 State location: NY | State of Inc.: NY | Fiscal Year End: 1231  
 (Assistant Director Office: 1)

Business Address: 335 MADISON AVE, NEW YORK NY 10017, 2129833100  
 Mailing Address: 335 MADISON AVENUE, 25TH FLOOR, NEW YORK NY 10017

Filter Results: Filing Type: Prior to: (YYYYMMDD) Ownership?  include  exclude  only Limit Results Per Page: 40 Entries Search Show All

Items 1 - 40 [RSS Feed](#) Next 40

Filings	Format	Description	Filing Date	File/Film Number
25	<a href="#">Documents</a>	[Paper] Notification of the removal from listing and registration of matured, redeemed or retired securities Acc-no: 999999997-03-018166 Size: 1 KB	2003-04-07	001-10967 03018133
SC 13G/A	<a href="#">Documents</a>	[Amend] Statement of acquisition of beneficial ownership by individuals Acc-no: 0000869906-02-000113 Size: 8 KB	2002-02-14	005-42278 02546181
SC 13G/A	<a href="#">Documents</a>	[Amend] Statement of acquisition of beneficial ownership by individuals Acc-no: 0000810868-01-000185 Size: 8 KB	2001-03-14	005-42278 1567968
SC 13G/A	<a href="#">Documents</a>	[Amend] Statement of acquisition of beneficial ownership by individuals Acc-no: 0000928598-01-500066 Size: 22 KB	2001-03-14	005-42278 1568235
15-12B	<a href="#">Documents</a>	Securities registration termination [Section 12(b)] Acc-no: 0000898822-01-000271 Size: 4 KB	2001-03-13	001-10967 1567565

STATEMENT OF ACQUISITION



Home | Latest Filings | Previous Page  
 U.S. Securities and Exchange Commission

**Filing Detail** Search the Next-Generation EDGAR System

SEC Home » Search the Next-Generation EDGAR System » Company Search » Current Page

**Form SC 13G - Statement of acquisition of beneficial ownership by individuals [amend]** SEC Accession No. 0000909518-99-000117

Filing Date: 1999-02-17  
 Accepted: 1999-02-17 00:00:00  
 Documents: 1

Document Format Files

Seq	Description	Document	Type	Size
1	Complete submission text file	0000909518-99-000117.txt	SC 13G/A	7935 9659

**MEDIAONE FINANCIAL SERVICES INC (Filed by) CIK: 0000780577 (see all company filings)**

IRS No.: 840931996 | State of Incorp.: CO | Fiscal Year End: 1231  
 SIC: 6199 Finance Services  
 Assistant Director 7

Business Address: 188 INVERNESS DR W, ENGLEWOOD CO 80112, 3038583545  
 Mailing Address: 188 INVERNESS DR W, ENGLEWOOD CO 80112

**ENHANCE FINANCIAL SERVICES GROUP INC (Subject) CIK: 0000881889 (see all company filings)**

IRS No.: 43333448 | State of Incorp.: NY | Fiscal Year End: 1231  
 Type: SC 13G/A | Act: 34 | File No.: 005-42278 | Film No.: 99543605  
 SIC: 6399 Insurance Carriers, NEC  
 Assistant Director 1

Business Address: 335 MADISON AVE, NEW YORK NY 10017, 2129833100  
 Mailing Address: 335 MADISON AVENUE, 25TH FLOOR, NEW YORK NY 10017



**EXHIBIT B – 17**  
**REPUBLIC NATIONAL BANK**  
**Excerpt from EDGAR\_0000315053-99-000007\_RepublicNationalBank**

INVESTOPEDIA EXPLAINS 'SEC FORM 13F'

SEC Form 13-F was made famous by investment con artist Bernie Madoff. It provides investors with an inside look at the holdings of Wall Street's largest investment managers. While this form can provide valuable insight into the management style of some of Wall Street's best, history has proven that these forms are only truly usable by investors when the investment manager reports accurately and honestly. SOURCE: <http://www.investopedia.com/terms/f/form-13f.asp>

CONFORMED SUBMISSION TYPE: 13F-HR  
PUBLIC DOCUMENT COUNT: 1  
CONFORMED PERIOD OF REPORT: 19990630  
FILED AS OF DATE: 19990727

FILER:

COMPANY DATA:

COMPANY CONFORMED NAM REPUBLIC NATIONAL BANK OF NEW YORK  
CENTRAL INDEX KEY: 0000315053  
STANDARD INDUSTRIAL CLASSIFICATION: []  
IRS NUMBER: 132774727

FILING VALUES:

FORM TYPE: 13F-HR  
SEC ACT:  
SEC FILE NUMBER: 028-00854  
FILM NUMBER: 99670674

BUSINESS ADDRESS:

STREET 1: ONE HANSON PLACE  
CITY: BROOKLYN  
STATE: NY  
ZIP: 11243  
BUSINESS PHONE: 2126192602

MAIL ADDRESS:

STREET 1: ONE HANSON PLACE  
CITY: BROOKLYN  
STATE: NY  
ZIP: 11243

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UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

FORM 13F

FORM 13F COVER PAGE

REPORT FOR THE CALENDAR YEAR OR QUARTER ENDED: 6/30/99



EXHIBIT B – 18  
HSBC ACQUIRED REPUBLIC NATIONAL BANK

NEW YORK TIMES

HOME PAGE TODAY'S PAPER VIDEO MOST POPULAR U.S. Edition ▼

**The New York Times** **Business Day**

WORLD U.S. N.Y. / REGION BUSINESS TECHNOLOGY SCIENCE HEALTH SPORTS OPINION

AUTOS

Search International DealBook Markets Economy Energy

**World-class culture in The Palm Beaches**

**HSBC to Pay \$10.3 Billion For Republic**  
By ALAN OWELL  
Published: May 11, 1999

**LONDON, May 10**— HSBC Holdings P.L.C. announced today that it would purchase the parent company of the Republic National Bank of New York for \$10.3 billion cash, the biggest foreign takeover deal for an American banking company.

The purchase of the Republic New York Corporation and an affiliate by HSBC -- an international banking group based in London with antecedents in Hong Kong and Shanghai -- would double the size of HSBC's private-banking business. It would also give HSBC the third-biggest retail branch network in the New York region, serving lower- and middle-income customers with low-cost checking and free automated teller machine services.

Banking industry analysts said the deal largely reflected HSBC's efforts to expand its highly profitable private-banking operations, which serve very wealthy clients.

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NOW PLAYING  
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**SEC'S EDGAR [0000903423-00-000022](#) RepublicNY.docx**

ACCESSION NUMBER: 0000903423-00-000022  
CONFORMED SUBMISSION TYPE: 8-K  
PUBLIC DOCUMENT COUNT: 2  
CONFORMED PERIOD OF REPORT: 19991231

ITEM INFORMATION:  
ITEM INFORMATION:  
ITEM INFORMATION:

FILED AS OF DATE: 20000110

FILER:

COMPANY DATA:

COMPANY CONFORMED NAME: REPUBLIC NEW YORK CORP  
CENTRAL INDEX KEY: 0000083246  
STANDARD INDUSTRIAL CLASSIFICATION: NATIONAL COMMERCIAL BANKS [6021]  
IRS NUMBER: 132764867  
STATE OF INCORPORATION: MD  
FISCAL YEAR END: 1231

FILING VALUES:

FORM TYPE: 8-K  
SEC ACT:  
SEC FILE NUMBER: 001-07436  
FILM NUMBER: 504094

BUSINESS ADDRESS:

STREET 1: 452 FIFTH AVE  
CITY: NEW YORK  
STATE: NY  
ZIP: 10018

BUSINESS PHONE: 2125256100

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<SEQUENCE>1  
<DESCRIPTION>8-K FILING  
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SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

-----  
FORM 8-K

CURRENT REPORT  
Pursuant to Section 13 or 15(d) of the  
Securities Exchange Act of 1934

Date of Report (Date of earliest event reported): December 31, 1999

HSBC USA Inc.  
(Exact Name of Registrant as Specified in Charter)

Maryland  
(State or Other Jurisdiction of Incorporation)

1-7436 13-2764867  
(Commission File Number) (IRS Employer Identification No.)

452 Fifth Avenue  
New York, New York 10018  
(Address of principal executive offices, including ZIP code)

(212) 525-6100  
(Registrant's telephone number, including area code)

Republic New York Corporation  
(former name or former address, if changed since last report)

<PAGE>

NOTE

Until January 3, 2000, Registrant was known as Republic New York Corporation.

Item 1. Change in Control of Registrant.

Effective at 12:00 noon on December 31, 1999, RNYC Merger Corporation, a Maryland corporation ("Merger Sub"), merged (the "Acquisition Merger") with and into Republic New York Corporation, a Maryland corporation ("Registrant") pursuant to a Transaction Agreement and Plan of Merger, dated as of May 10, 1999, as amended as of November 8, 1999 by and among HSBC Holdings plc, an English public limited company ("HSBC"), Merger Sub, Registrant and Safra Republic Holdings S.A. (the "Merger Agreement"). Merger Sub was a direct wholly owned subsidiary of HSBC North America Inc., a Delaware corporation ("HSBC NA"), and an indirect wholly owned subsidiary of HSBC.

Pursuant to the Merger Agreement, each outstanding share of common stock, par value \$5.00 per share of Registrant ("Registrant Common Stock"), was cancelled and converted solely into the right to receive \$72.00 in cash, without interest thereon. Also pursuant to the Merger Agreement, each (a) share of Registrant's Dutch Auction Rate Transferable Securities Preferred Stock, Series A (the "Republic Series A DART Preferred Stock"), (b) share of Registrant's Dutch Auction Rate Transferable Securities Preferred Stock, Series B (the "Republic Series B DART Preferred Stock"), (c) Depositary Share representing a one-fourth interest in a share of Registrant's Adjustable Rate Cumulative Preferred Stock, Series D (the "Republic Series D Preferred Stock"), (d) share of Registrant's \$1.8125 Cumulative Preferred Stock (the "Republic \$1.8125 Preferred Stock"), and (e) share of Registrant's \$2.8575 Cumulative Preferred Stock (the "Republic \$2.8575 Preferred Stock") remained unchanged as an issued and outstanding share of preferred stock of the same respective series of Registrant following the effective time of the Acquisition Merger. In addition, Registrant's 8 3/8% Debentures due 2007 (the "Republic 8 3/8% Debentures") remained unchanged as issued and outstanding publicly-held debt of the Registrant. Pursuant to the Merger Agreement, each share of common stock, par value \$0.01 per share, of Merger Sub was converted into one share of Registrant Common Stock. As a result, 100% of the Registrant Common Stock is owned directly by HSBC NA and indirectly by HSBC and Registrant became a subsidiary of HSBC NA and an indirect subsidiary of HSBC.

The Registrant's Proxy Statement filed on Schedule 14A, which was first mailed to stockholders of Registrant on or about August 9, 1999 (the "Proxy Statement"), and Registrant's Supplement to Proxy Statement filed as Definitive

Additional Materials on Schedule 14A, which was first mailed to stockholders of Registrant on or about November 10, 1999 (the "Supplement"), set forth certain information regarding HSBC; the amount of consideration used by HSBC; the date and a description of the Acquisition Merger.

HSBC NA obtained funds to pay holders of Registrant Common Stock from capital contributions and debt financing provided by HSBC and certain of HSBC's non-U.S. subsidiaries.

A copy of the press release announcing the closing of the Acquisition Merger and the Holding Company Merger (as defined below) is filed as Exhibit 99.1 to this Current Report on Form 8-K and is incorporated by reference herein.

Item 2. Acquisition or Disposition of Assets.

Effective at 12:15 p.m. on December 31, 1999, HSBC USA Inc., a Delaware corporation, a direct subsidiary of HSBC NA, and an indirect wholly owned subsidiary of HSBC ("Old HSBC USA"), merged with and into Registrant (the "Holding Company Merger"). In the Holding Company Merger, each issued and outstanding share of Registrant Common Stock, Republic Series A DART Preferred Stock, Republic Series B DART Preferred Stock, Republic Series D Preferred Stock, Republic \$1.8125 Preferred Stock and Republic \$2.8575 Preferred Stock issued and outstanding immediately prior to the Effective Time remained unchanged as an issued and outstanding share of Registrant Common Stock or preferred stock of the same respective series of the Registrant, respectively. In addition, the Republic 8 3/8% Debentures remained unchanged as issued and outstanding publicly-held debt of the Registrant.

Also pursuant to the Holding Company Merger, all of the shares of common stock, par value \$5.00 per share, of Old HSBC USA were converted into an aggregate of one share of Registrant Common Stock and each share of Series X Preferred Stock, without par value, of Old HSBC USA was converted into one share of Series X Preferred Stock, no par value, of Registrant.

A copy of the press release announcing the closing of the Acquisition Merger and the Holding Company Merger is filed as Exhibit 99.1 to this Current Report on Form 8-K and is incorporated by reference herein.

The Acquisition Merger will be treated for accounting purposes as a purchase of Registrant by HSBC NA, the sole common shareholder of Old HSBC USA prior to the Holding Company Merger. As a result, the historic balance sheet of Registrant is required to be restated at fair value as of December 31, 1999.

The Holding Company Merger will be treated for accounting purposes as an "as if" pooling of interests between Old HSBC USA and Registrant, as successor in the Acquisition Merger. As a result, the Quarterly Report on Form 10-Q filed by Registrant for the period ended September 30, 1999 was the last report filed by Registrant reflecting the historic financial position of Republic New York Corporation. From and after December 31, 1999, the financial statements filed by Registrant with the Securities and Exchange Commission will present the historic financial position of Old HSBC USA.

A description of the assets of Republic New York Corporation may be found in Registrant's Annual Report on Form 10-K for the year ended December 31, 1998, which is incorporated by reference herein.

Item 5. Other Events.

A. Name Change

On January 3, 2000, Registrant filed an Amendment to its charter to change its name to "HSBC USA Inc."

B. Registration

In the Holding Company Merger, Registrant assumed the payment obligations and all other covenants required to be performed or observed by Old HSBC USA in connection with the Old HSBC USA 7% Subordinated Notes due 2006 (the "7% Notes") listed on the New York Stock Exchange, Inc. (the "NYSE"). Pursuant to Rule 12g-3, the 7% Notes of Registrant, as successor issuer to Old HSBC USA, will be deemed registered for purposes of Section 12(b) of the Securities Exchange Act of 1934, as amended.

C. NYSE Symbols

Commencing on January 4, 2000, the Republic Series D Preferred Stock, Republic \$1.8125 Preferred Stock, Republic \$2.8575 Preferred Stock, the Republic 8 3/8% Debentures and the 7% Notes will be listed on the NYSE under the symbols

HBAPRD, HBAPRE, HBAPRF, HBA 07 and HBA 06, respectively.

Item 7. Financial Statements, Pro Forma Financial Information and Exhibits.

(a) FINANCIAL STATEMENTS OF BUSINESSES ACQUIRED. The consolidated statement of condition of Republic New York Corporation as of December 31, 1998 and December 31, 1997, the consolidated statements of income, cash flows and changes in stockholders' equity of Republic New York Corporation for the fiscal years ended December 31, 1998, 1997 and 1996, the related notes to the consolidated financial statements and the related accountant's report are incorporated herein by reference to the Annual Report on Form 10K of Republic New York Corporation for the fiscal year ended December 31, 1998 (previously filed on March 9, 1999, Commission File No. 1-7436). The unaudited consolidated statement of condition of Republic New York Corporation as of September 30, 1999, the unaudited consolidated statements of income, cash flows and changes in stockholders' equity of Republic New York Corporation for the quarters ended September 30, 1999 and 1998, and the related notes to the consolidated financial statements are incorporated herein by reference to the Quarterly Report on Form 10Q of Republic New York Corporation for the quarter ended September 30, 1999 (previously filed on November 12, 1999).

(b) PRO FORMA FINANCIAL INFORMATION. Pro forma financial information and exhibits required by Item 2 hereof will be filed by amendment to this Current Report on Form 8-K not later than 60 days after the date this Current Report on Form 8-K was required to be filed.

(c) EXHIBITS.

99.1 Press Release dated December 31, 1999.

<PAGE>

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the Registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Date: January 7, 2000

HSBC USA Inc.  
(Registrant)

By: /s/ Gerald A. Ronning

Name: Gerald A. Ronning  
Title: Executive Vice  
President & Controller

<PAGE>

EXHIBIT INDEX

EXHIBIT NO.	DESCRIPTION
99.1	Press Release dated December 31, 1999.

</TEXT>  
</DOCUMENT>  
<DOCUMENT>  
<TEXT EX-99.1  
<SEQUENCE 2  
<DESCRIPTION EXHIBIT 99.1  
<TEXT>

Exhibit 99.1

HSBC COMPLETES THE ACQUISITION OF REPUBLIC NEW YORK CORPORATION AND SRH

31 DECEMBER 1999

HSBC Holdings plc ("HSBC") completed the acquisition of Republic New York Corporation ("RNYC") and Safra Republic Holdings S.A. ("SRH") at 12.00 noon Eastern Standard Time in New York on 31 December 1999. Following the acquisition, RNYC merged with HSBC USA Inc., HSBC's New York-based US bank holding company. The combined entity will be named HSBC USA Inc..

HSBC Bank USA and Republic National Bank of New York are the principal operating subsidiaries of HSBC USA Inc. and RNYC respectively. After close of business on 31 December 1999, Republic National Bank of New York will convert to a New York state-chartered bank and will then merge with HSBC Bank USA. The newly merged bank will be named HSBC Bank USA.

Simultaneously with the completion of the RNYC acquisition, HSBC Holdings plc accepted for payment 36,254,767 shares of SRH common stock tendered to it by 17.00hrs Central European Time on 29 December 1999. The shares tendered together with the shares already owned by subsidiaries of RNYC represent approximately

99.38 per cent of SRH's issued and outstanding common stock.

Holders of RNYC common stock will receive US\$72.00 cash per share. A letter of transmittal will be posted to shareholders in early January to enable them to surrender stock certificates in return for payment by cheque. Holders of SRH common stock who tendered their shares properly will receive either US\$72 cash per share or loan notes if they have elected to do so.

Payment to common stockholders of RNYC will be made from 7 January 2000 and common stockholders of SRH who tendered their shares properly will be paid or have loan notes issued to them on 10 January 2000. RNYC and HSBC USA Inc. preferred stock and publicly-held debt remain outstanding as preferred stock and publicly-held debt of HSBC USA Inc..

RNYC's common stock will be de-listed from the New York and London stock exchanges. It is HSBC Holdings plc's intention to de-list SRH common stock from the Luxembourg and Swiss stock exchanges.

HSBC has extended the tender period for holders of SRH common stock until 31 January 2000. This allows stockholders who have not tendered, or not properly tendered, their shares an additional opportunity to do so. Details of this extended tender period will be published in the LUXEMBURGER WORT, LE TEMPS and NEUE ZUERCHER ZEITUNG on 7 January 2000.

The acquisitions represent a major step forward for HSBC towards achieving three strategic objectives. The deal:

- o doubles HSBC's private banking business to approximately 55,000 international private banking clients with over US\$120 billion of client funds under management.
- o extends HSBC's US domestic, personal and commercial banking business. The combined operations will have the third largest branch network in New York State with 455 branches serving more than two million customers.
- o enhances HSBC's global markets business in treasury and foreign exchange and the addition of world leading businesses in banknotes and bullion.

Sir John Bond, Group Chairman of HSBC Holdings plc, said: "We are delighted to have completed the acquisitions of RNYC and SRH. The fit with HSBC's businesses and strategy is extraordinarily good. The task before us now is to integrate our operations and make them seamless for our customers.

"While we are extremely sad to be moving forward without Edmond Safra, merging our organisations and maintaining the highest standards of integrity and customer service will be the best way of honouring his memory."

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-----END PRIVACY-ENHANCED MESSAGE-----

EXHIBIT B – 19

C-BASS Sells Litton Loan to Residential Asset Funding Corporation

C-Bass sells Litton Loan (Ex-B-19: SEC filing 12-14-2001) to Residential Asset Funding Corporation (SEC filing)

EDGAR 0001051170-01-500266 ResidentialAssetFunding-C-Bass.docx

ACCESSION NUMBER: 0001051170-01-500266  
CONFORMED SUBMISSION TYPE: 10-K/A  
PUBLIC DOCUMENT COUNT: 1  
CONFORMED PERIOD OF REPORT: 20001231  
FILED AS OF DATE: 20011214

FILER:

COMPANY DATA:

COMPANY CONFORMED NAME: RESIDENTIAL ASSET FUNDING CORP C-BASS 2000-CB4  
CENTRAL INDEX KEY: 0001132646  
STANDARD INDUSTRIAL CLASSIFICATION: ASSET-BACKED SECURITIES [6189]

FILING VALUES:

FORM TYPE: 10-K/A  
SEC ACT: 1934 Act  
SEC FILE NUMBER: 333-81721-02  
FILM NUMBER: 1813993

BUSINESS ADDRESS:

STREET 1: 301 SOUTH COLLEGE STREET, DC-06  
CITY: CHARLOTTE  
STATE: NC  
ZIP: 28202-6001

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SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM 10-K/A

Annual report pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the fiscal year ended December 31, 2000

Transition report pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the transition period from to

Commission File Number: 333-81721-02

RESIDENTIAL ASSET FUNDING CORPORATION

(Exact name of registrant as specified in its charter)

North Carolina

56-2064715

(State or other jurisdiction of incorporation)

(IRS Employer Identification No.)

301 South College Street, DC-06  
Charlotte, North Carolina  
(Address of principal executive offices)

28202-6001  
(Zip Code)

Registrant's telephone number, including area code : (704) 374-4868

C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB4

(Title of each class of securities covered by this Form)

Securities registered pursuant to Section 12(b) of the Act: None  
Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing

requirements for the past 90 days. Yes [X] No [ ]

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K/A or any amendment to this Form 10-K/A. [X]

Documents incorporated by reference: None

<PAGE>

AMENDMENT NUMBER 1 OF 1

<PAGE>

-2-

RESIDENTIAL ASSET FUNDING CORPORATION  
C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB4

PART IV

Item 14. Exhibits, Financial Statement Schedules and Reports on Form 8-K

(a) The following documents are filed as part of this report:

- (1) Financial Statements:  
Omitted.
- (2) Financial Statement Schedules:  
Omitted.
- (3) Exhibits:

Annual Servicer Statements of Compliance, filed as Exhibit 99.1 hereto.  
Annual Statement of Independent Accountants Report for the Servicer,  
filed as Exhibit 99.2 hereto.

(b) Reports on Form 8-K: The following Current Reports on Form 8-K were filed by the Registrant during the last quarter of 2000.

Current Reports on Form 8-K, dated December 26, 2000, were filed for the purpose of filing the Monthly Statement sent to the Holders of the Offered Certificates for payments made on the same dates.  
The items reported in such Current Report were Item 5 (Other Events).

(c) Exhibits to this report are listed in Item (14)(a)(3) above.

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<PAGE>

SIGNATURE

Pursuant to the requirements of Section 13 or 15(d) of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned thereunto duly authorized.

THE CHASE MANHATTAN BANK,  
not in its individual capacity but solely  
as Trustee under the Agreement referred  
to herein

Date: December 13, 2001

By: /s/ Karen Schluter  
Karen Schluter  
Assistant Vice President

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<PAGE>

EXHIBIT INDEX

Exhibit	Description
99.1	Servicer's Annual Statements of Compliance
99.2	Servicer's Annual Independent Accountant's Report

-5-

EXHIBIT 99.1 - Servicer's Annual Statement of Compliance

-6-

<page>

LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.  
5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

Litton Loan Servicing LP  
Compliance Certification Year Ended December 31, 2000  
C-BASS, Series 2000-CB4

The undersigned Officer of Litton Loan Servicing LP certifies that for the year ended December 31, 2000, Litton has complied with Section 3.27 of the Pooling and Servicing Agreement by and between Residential Asset Funding Corporation, as Depositor, Credit-Based Asset Servicing and Securitization LLC, as seller, The Chase Manhattan Bank, as Trustee and Litton Loan Servicing LP, as Servicer, dated November 1, 2000, as they relate to the Internal Revenue Service Information reporting requirements including those under Sections 6050J.

By: /s/ Janice McClure Dated: Dec 4, 2001  
Janice McClure  
Senior Vice President

State of Texas  
County of Harris

On December 4, 2001, before me a Notary Public in and for said state, personally appeared Janice McClure of Litton Loan Servicing LP, personally known to me to be the person whose name is subscribed to the within the instrument and acknowledged to me that he executed that same in his authorized capacity, and that by his signature on the instrument, the entity upon behalf of which the person acted executed the instrument.

WITNESS my hand and official seal.

/s/ Amanda Lee Foster  
Amanda Lee Foster  
Notary Public  
State of Texas  
Commission Expires 01-26-2004

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<page>

LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.  
5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

March 30, 2001

Karen Schluter  
The Chase Manhattan Bank  
450 West 33rd Street, 14th floor  
New York, New York 10001-2697

Subject: C-BASS 2000-CB4

To Whom it May Concern:

The undersigned officer of Litton Loan Servicing LP (successor in interest to Litton Loan Servicing, Inc.) certifies that a review of the servicing activity for the year ended December 31, 2000 has been completed under such officer's supervision and that there were no defaults or exceptions to the requirements of the subject agreement between the above-listed parties. Litton Loan Servicing LP hereby certifies that:

1. All ad valorem taxes have been paid when due and without penalty to the Trust.
2. All assessments and ground rents of whatsoever kind or nature have been paid so as to prevent their taking priority to the purchase money lien or lien to which the trust is entitled.
3. All casualty insurance has been paid without lapse in coverage and in an amount sufficient to prevent the application of a co-insurance clause.
4. In compliance with terms of the agreement, flood insurance as required by the National Flood Insurance Act of 1994, P.L. 103-325 §511, if any, has been maintained without lapse.
5. Errors and Omissions Insurance is in forced in amounts sufficient to meet the requirements of Federal National Mortgage Association, Federal Home Loan Mortgage Corporation and the terms of the subject agreement.
6. Litton Loan Servicing LP has timely filed the required IRS informational returns including the forms 1098, 1099(A), and those required by code sections 6050(h)(j)(p) for the year ended December 31, 2000.



7. Litton Loan Servicing LP has not committed any act or omitted to act in any manner that would cause the trust to lose the REMIC tax treatment or be taxed on prohibited transaction.

8. All other items and requirements of the Servicing Agreement between the above parties have been complied with except as noted on the attachment to this letter if any.

Sincerely,

Litton Loan Servicing LP  
/s/ Janice McClure  
Janice McClure  
Senior Vice President

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<page>  
LITTON LOAN SERVICING, LP  
a subsidiary of Enhance Financial Services Group Inc.

5373 West Alabama, Suite 600 Telephone 713.960.9676  
Houston, Texas 77056 Fax 713.966.8856

January 12, 2001

As of December 31, 2000, Litton Loan Servicing LP has complied in all material respects with the minimum servicing set forth in the Mortgage Bankers Association of America's Uniform Single Attestation Program for Mortgage Bankers. As of and for this same period, Litton Loan Servicing LP had in effect a fidelity bond in the amount of \$10,000,000 and an errors and omissions policy in the amount of \$10,000,000.

/s/ Larry B. Litton, Sr.  
Larry B. Litton, Sr., President & CEO

/s/ Janice McClure  
Janice McClure, Senior Vice President

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<page>  
EXHIBIT 99.2 - Servicer's Annual Independent Accountant's Report

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Deloitte & Touche LLP  
Suite 2300  
333 Clay Street  
Houston, Texas 77002

**INDEPENDENT AUDITORS' REPORT**

To the Partners of  
Litton Loan Servicing LP:

We have examined management's assertion about Litton Loan Servicing LP's (the "Company") compliance with the minimum servicing standards identified in the Mortgage Bankers Association of America's Uniform Single Attestation Program for Mortgage Bankers as of and for the year ended December 31, 2000, included in the accompanying management assertion. Management is responsible for the Company's compliance with those minimum servicing standards. Our responsibility is to express an opinion on management's assertion about the Company's compliance based on our examination.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about the Company's compliance with minimum servicing standards and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination of the Company's compliance with the minimum servicing standards.

In our opinion, management's assertion that the Company complied with the aforementioned minimum servicing standards as of and for the year ended December 31, 2000 is fairly stated, in all material respects.

January 12, 2001

</TEXT>  
</DOCUMENT>  
</SEC-DOCUMENT>

-----END PRIVACY-ENHANCED MESSAGE-----

EXHIBIT B – 20

C-Bass Sells Litton Loan to Residential Asset Funding Corporation

C-Bass sells Litton Loan (Ex-B-19: SEC filing 12-14-2001) to Residential Asset Funding Corporation (SEC filing)

EDGAR [0001005150-00-001714-0001](#) ResidentialAssetFundng-LittonLoan.docx

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

Form 8-K

CURRENT REPORT

Pursuant to Section 13 or 15(d) of the  
Securities Exchange Act of 1934

Date of Report (Date of earliest event reported) December 13, 2000

Residential Asset Funding Corporation

(Exact name of registrant as specified in its charter)

<TABLE>

<S>	<C>	<C>
North Carolina	333-81721	56-2064715
(State or Other Jurisdiction of Incorporation)	(Commission File Number)	(I.R.S. Employer Identification No.)

</TABLE>

<TABLE>

<S>	<C>
301 South College Street, DC-06 Charlotte, North Carolina	28202-6001
(Address of Principal Executive Offices)	(Zip Code)

</TABLE>

Registrant's telephone number, including area code (704) 374-4868

No Change

(Former name or former address, if changed since last report)

<PAGE>

Item 2. Acquisition or Disposition of Assets

Description of the Certificates and the Mortgage Loans

Residential Asset Funding Corporation registered issuances of up to \$1,500,000,000 principal amount of Asset-Backed Certificates on a delayed or continuous basis pursuant to Rule 415 under the Securities Act of 1933, as amended (the "Act"), by the Registration Statement on Form S-3 (Registration File No. 333-81721) (the "Registration Statement"). Pursuant to the Registration Statement, C-BASS Mortgage Loan Asset-Backed Certificates, Series 2000-CB4 (the "Issuer") issued \$161,840,000 in aggregate principal amount of its Asset-Backed Certificates, Class A-1F, Class A-2F, Class A-1A, Class M-1, Class M-2, Class B-1 and Class B-2 (the "Certificates"), on December 13, 2000. This Current Report on Form 8-K is being filed to satisfy an undertaking to file copies of certain agreements executed in connection with the issuance of the Certificates.

The Certificates were issued pursuant to a Pooling and Servicing Agreement (the "Agreement") attached hereto as Exhibit 4.1, dated as of November 1, 2000, among Residential Asset Funding Corporation, as depositor (the "Depositor"), The Chase Manhattan Bank, as trustee (the "Trustee"), Litton Loan Servicing LP, as servicer (the "Servicer"), and Credit-Based Asset Servicing and Securitization LLC, as seller (the "Seller"). The Certificates represent beneficial ownership interests in a pool of mortgage loans and certain related property.

As of December 1, 2000, the Mortgage Loans possessed the characteristics described in the Prospectus dated September 9, 1999 and the Prospectus Supplement dated December 7, 2000 filed pursuant to Rule 424(b)(5) of the Act on December 14, 2000.

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<PAGE>

Item 7. Financial Statements, Pro Forma Financial Information and Exhibits.

(a) Not applicable

(b) Not applicable

(c) Exhibit 1.1. Underwriting Agreement, dated December 7, 2000, between Residential Asset Funding Corporation and First Union Securities, Inc.

Exhibit 4.1. Pooling and Servicing Agreement, dated as of November 1, 2000, among Residential Asset Funding Corporation, as Depositor, Litton Loan Servicing LP., as Servicer, The Chase Manhattan Bank, as Trustee, and Credit-Based Asset Servicing and Securitization LLC, as Seller.

Exhibit 8.1. Opinion of Dewey Ballantine LLP regarding tax matters, dated December 13, 2000.

Exhibit 10.1. Mortgage Loan Purchase Agreement, dated as of November 1, 2000, between Credit-Based Asset Servicing and Securitization LLC, as Seller and Residential Asset Funding Corporation, as Purchaser.

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<PAGE>

SIGNATURES

Pursuant to the requirements of Section 13 or 15(d) of the Securities Exchange Act of 1934, the registrant has duly caused this Report to be signed on its behalf by the undersigned thereunto duly authorized.

RESIDENTIAL ASSET FUNDING CORPORATION,  
as Depositor and on behalf of 2000-CB4 Trust

Registrant

By: /s/ Eric Kaplan

-----  
Name: Eric Kaplan

Title: Vice President

Dated: December 27, 2000

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<PAGE>

EXHIBIT INDEX

<TABLE>

<CAPTION>

Exhibit No.	Description
-----	-----
<S>	<C>
Exhibit 1.1.	Underwriting Agreement, dated December 7, 2000, between Residential Asset Funding Corporation and First Union Securities, Inc.
Exhibit 4.1.	Pooling and Servicing Agreement, dated as of November 1, 2000, among Residential Asset Funding Corporation, as Depositor, Litton Loan Servicing LP., as Servicer, The Chase Manhattan Bank, as Trustee, and Credit-Based Asset Servicing and Securitization LLC, as Seller.
Exhibit 8.1.	Opinion of Dewey Ballantine LLP regarding tax matters, dated December 13, 2000.
Exhibit 10.1.	Mortgage Loan Purchase Agreement, dated as of November 1, 2000, between Credit-Based Asset Servicing and Securitization LLC, as Seller and Residential Asset Funding Corporation, as Purchaser.

</TABLE>

</TEXT>

</DOCUMENT>

EXHIBIT B – 21  
RADIAN ACQUIRES ENHANCED FINANCIAL SERVICES

1/19/2015

News Release



**Radian to Acquire Enhance Financial in a \$640 Million Stock-for-Stock Transaction**

PHILADELPHIA and NEW YORK, Nov. 14 /PRNewswire/ -- Radian Group Inc., Philadelphia (NYSE: RDN), today announced a definitive agreement to acquire Enhance Financial Services Group Inc., New York City (NYSE: EFS), in an all-stock transaction.

The transaction, which has been approved by the boards of directors of both companies, calls for Enhance Financial stockholders to receive .22 shares of Radian common stock for each share of Enhance Financial common stock. Based on Radian's closing price of \$64.19 on November 13, 2000, this represents \$640 million in the aggregate.

The transaction, which is expected to close in the first quarter of 2001, is subject to various regulatory approvals, as well as the approval of Radian and Enhance Financial stockholders and certain other conditions. It will be treated as a purchase for accounting purposes, and is anticipated to qualify as a tax-free reorganization for federal income tax purposes. The transaction is expected to be immediately accretive to Radian's earnings per share.

The acquisition will further expand the scope of Radian Group's activities beyond its core business -- primary mortgage insurance -- into the broader areas of financial guaranty insurance and reinsurance. Enhance Financial's primary businesses insure or reinsure municipal and asset-backed obligations, trade credit and other credit-related businesses.

Commenting on the transaction, Radian Chairman and Chief Executive Officer Frank P. Filippis said: "This transaction accelerates Radian's long-term, strategic plan to diversify across the credit enhancement spectrum. It leverages our company's expertise in credit and risk management, and will create new options for Radian clients seeking the most cost-effective credit enhancements and financial products.

"Enhance Financial's clients, which include some of the nation's largest corporate and municipal bond insurers, investment banks and issuers, will benefit from Radian's stronger balance sheet and our deep understanding of, and commitment to, the financial guaranty business."

"Enhance Financial recently announced a strategic plan to refocus on our core businesses -- reinsurance and asset-based insurance," commented Daniel Gross, President and Chief Executive Officer of Enhance Financial. "At that time, we said that we would also consider a strategic buyer, and that is certainly our view of Radian.

"Our respective businesses complement one another. Their management is committed to the financial guaranty sector, the company has a strong balance sheet, and our two organizations are culturally compatible. This is a strong match, and one that will accelerate Enhance Financial's future success."

Radian said that Enhance Financial will operate as a standalone unit, under its current name and will continue to be headquartered in New York City.

Goldman Sachs acted as Radian's financial advisor in this transaction, and Morgan Stanley Dean Witter acted as advisor to Enhance Financial.

Radian Group Inc. will hold a conference call to discuss this acquisition today at 9:00 a.m. Eastern time. To participate in the call, please dial 1-888-209-3797. Individuals interested in listening to the call may logon to the simultaneous webcast at: <http://www.videonewswire.com/RADIAN/111300/>. The call will also be archived on the website [www.prnnews.com](http://www.prnnews.com). To access the replay, click on the conference calls link under Multimedia.

Enhance Financial Services Group Inc. is a leading provider of credit-based insurance and financial services. Enhance Financial's subsidiaries and affiliates provide financial guaranty insurance and reinsurance in a wide variety of domestic and international markets. Its Enhance Reinsurance Company is the largest provider of financial guaranty reinsurance in the United States.

**EXHIBIT B – 21 cont'd.**  
**RADIAN ACQUIRES ENHANCED FINANCIAL SERVICES**

1/19/2015

News Release

Radian Group Inc. is the parent company of Radian Guaranty Inc. The company provides private mortgage insurance and risk management services to mortgage lenders nationwide; these services increase homeownership opportunities by helping people to buy homes with downpayments of less than 20 percent. Private mortgage insurance protects lenders from default-related losses on residential first mortgages and facilitates the sale of low-downpayment mortgage loans in the secondary market.

SOURCE Radian Group Inc.

Web site: <http://www.radianmi.com>

CONTACT: Rick Lutenski for Enhance Financial, 212-984-9153; or Bill Campbell, media, 212-254-6670, or Jonathan T. McGrain, Investors, 215-564-6600, ext. 3319, both for Radian

"Safe Harbor" Statement under the Private Securities Litigation Reform Act of 1995: Statements in this press release regarding Radian Group Inc.'s business which are not historical facts are "forward-looking statements" that involve risks and uncertainties. For a discussion of such risks and uncertainties, which could cause actual results to differ from those contained in the forward-looking statements, see "Risk Factors" in the Company's Annual Report or Form 10-K for the most recently ended fiscal year.

**EXHIBIT B – 22**  
**C-BASS CAPITAL LLC FIRST SEC FILING**  
 (DOWNLOAD AT <http://www.sec.gov/Archives/edgar/vpr/02/9999999997-02-018183>)



[Home](#) | [Latest Filings](#) | [Previous Page](#)

U.S. Securities and Exchange Commission

EDGAR Search Results

**EDGAR** Search Results  
 BETA View

[SEC Home](#) » [Search the Next-Generation EDGAR System](#) » [Company Search](#) » [Current Page](#)

**C-BASS CAPITAL LLC CIK#: 0001038155 (see all company filings)**

State location: NY | State of Inc.: DE | Fiscal Year End: 1231  
 formerly: HEMLOCK CAPITAL LLC (filings through 2006-03-01)  
 formerly: HEMLOCK CAPITAL LLC /BD (filings through 2002-02-26)

Business Address  
 335 MADISON AVE  
 NEW YORK NY 10017  
 212-850-5082

Mailing Address  
 C/O C-BASS  
 338 MADISON AVENUE  
 NEW YORK NY 10017

Filter Results: Filing Type:  Prior to: (YYYYMMDD)  Ownership?  include  exclude  only Limit Results Per Page  Search

Items 1 - 9 [RSS Feed](#)

Filings	Format	Description	Filing Date	File/Film Number
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-09-005301 (34 Act) Size: 1 KB	2009-02-24	008-50159 09055558
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-06-013848 (34 Act) Size: 1 KB	2008-03-03	008-50159 09029421
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-07-015306 (34 Act) Size: 1 KB	2007-03-01	008-50159 07005876
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-06-021536 (34 Act) Size: 1 KB	2006-03-01	008-50159 09008143
FOCUSN	<a href="#">Documents</a>	[Paper]Non-public annual audit reports filed by brokers or dealers Acc-no: 9999999997-05-019023 (34 Act) Size: 1 KB	2005-03-01	008-50159 05042125
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-05-018140 (34 Act) Size: 1 KB	2005-03-01	008-50159 05042157
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-04-010907 Size: 1 KB	2004-02-27	008-50159 04003041
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-03-008754 Size: 1 KB	2003-02-28	008-50159 03012407
X-17A-5	<a href="#">Documents</a>	[Paper]FOCUS Report Acc-no: 9999999997-02-018183 Size: 1 KB	2002-02-26	008-50159 02006046

EXHIBIT B – 23

GOLDMAN SACHS ADVISED RADIAN ON THE PURCHASE OF ENHANCE FINANCIAL SERVICES  
Excerpt from EDGAR [w43583s-4 RadianGroup\\_12-27-2000.docx](#)

AS FILED WITH THE SECURITIES AND EXCHANGE COMMISSION ON DECEMBER 27, 2000

REGISTRATION NO. 333-

SECURITIES AND EXCHANGE COMMISSION

WASHINGTON D.C. 20549

FORM S-4

REGISTRATION STATEMENT

UNDER

THE SECURITIES ACT OF 1933

RADIAN GROUP INC.

(EXACT NAME OF REGISTRANT AS SPECIFIED IN ITS CHARTER)

<TABLE>

<S>	DELAWARE	<C>	6719	<C>	23-2691170
	(STATE OR OTHER JURISDICTION OF INCORPORATION OR ORGANIZATION)		(PRIMARY STANDARD INDUSTRIAL CLASSIFICATION CODE NUMBER)		(I.R.S. EMPLOYER IDENTIFICATION NO.)

</TABLE>

1601 MARKET STREET  
PHILADELPHIA, PENNSYLVANIA 19103  
(215) 564-6600

(ADDRESS AND TELEPHONE NUMBER OF REGISTRANT'S PRINCIPAL EXECUTIVE OFFICES)

HOWARD S. YARUSS

SENIOR VICE PRESIDENT,

SECRETARY AND GENERAL COUNSEL

RADIAN GROUP INC.

1601 MARKET STREET

PHILADELPHIA, PENNSYLVANIA 19103

(215) 564-6600

(NAME, ADDRESS AND TELEPHONE NUMBER OF AGENT FOR SERVICE)

COPIES TO:

<TABLE>

<S>		<C>	SAMUEL BERGMAN, ESQ.	<C>	
			EXECUTIVE VICE PRESIDENT, SECRETARY AND GENERAL COUNSEL		
	TREVOR S. NORWITZ, ESQ.		ENHANCE FINANCIAL SERVICES GROUP		DAVID W. BERNSTEIN, ESQ.
	WACHTELL, LIPTON, ROSEN & KATZ		INC.		CLIFFORD CHANCE ROGERS & WELLS LLP
	51 WEST 52ND STREET		335 MADISON AVENUE, 25TH FLOOR		200 PARK AVENUE
	NEW YORK, NEW YORK 10019		NEW YORK, NEW YORK 10017		NEW YORK, NEW YORK 10166
	(212) 403-1000		(212) 984-9200		(212) 878-8000

</TABLE>

APPROXIMATE DATE OF COMMENCEMENT OF PROPOSED SALE OF THE SECURITIES TO THE PUBLIC: As soon as practicable after this Registration Statement becomes effective and the satisfaction or waiver of all other conditions to the merger of Enhance Financial Services Group Inc. with GOLD Acquisition Corporation, a wholly owned subsidiary of Radian Group Inc.

If the securities being registered on this form are being offered in connection with the formation of a holding company and there is compliance with General Instruction G, check the following box: [ ]

If this form is filed to register additional securities for an offering pursuant to Rule 462(b) under the Securities Act of 1933, as amended (the "Securities Act"), check the following box and list the Securities Act registration statement number of the earlier effective registration statement for the same offering: [ ]

If this form is a post-effective amendment filed pursuant to Rule 462(d) under the Securities Act, check the following box and list the Securities Act registration statement number of the earlier effective registration statement for the same offering: [ ]





Radian common shares, including the shares issued to shareholders of Enhance Financial Services in the merger, will continue to be listed on the New York Stock Exchange under the trading symbol "RDN."

Enhance Financial Services will hold a special meeting of its shareholders to consider and vote on the merger proposal. Radian will hold a special meeting of its stockholders to consider and vote on the proposal to issue Radian common shares in the merger.

YOUR VOTE IS VERY IMPORTANT. Whether or not you plan to attend your stockholders' meeting, please take the time to vote by completing the enclosed proxy card and mailing it to us or, if you are an Enhance Financial Services shareholder, you may also vote by following the Internet or telephone instructions on the proxy card. If you sign, date and mail your proxy card without indicating how you want to vote, your proxy will be counted as a vote FOR each of the proposals presented. If you neither return your card nor, if you are an Enhance Financial Services shareholder, vote by Internet or telephone, or if you do not instruct your broker how to vote any shares held for you in "street name," your shares will not be voted at the meeting.

APPROVAL OF THE MERGER BY THE ENHANCE FINANCIAL SERVICES SHAREHOLDERS REQUIRES THE AFFIRMATIVE VOTE OF TWO-THIRDS OF ITS OUTSTANDING SHARES. THEREFORE, AN ENHANCE FINANCIAL SERVICES SHAREHOLDER NOT VOTING HAS THE SAME EFFECT AS VOTING AGAINST THE MERGER.

The dates, times and places of the stockholders' meetings are as follows:

RADIAN STOCKHOLDERS:		ENHANCE FINANCIAL SERVICES SHAREHOLDERS:	
<S>	[ ] a.m., local time	<S>	[ ] a.m., local time

This Joint Proxy Statement/Prospectus gives you detailed information about the merger we are proposing, and it includes our merger agreement as Annex A. You can get more information about our companies from publicly available documents we have filed with the Securities and Exchange Commission. We encourage you to read carefully this entire document, including all its annexes, and we especially encourage you to read the section on "Risk Factors" beginning on page 15.

We enthusiastically support this compelling combination of two successful companies, and we join with the members of our boards of directors in recommending that you vote in favor of the merger and the related proposal.

-----	-----
Frank P. Philipps	Daniel Gross
Chairman and Chief Executive Officer	President and Chief Executive Officer
Radian Group Inc.	Enhance Financial Services Group Inc.

NEITHER THE SECURITIES AND EXCHANGE COMMISSION NOR ANY STATE SECURITIES COMMISSION HAS APPROVED OR DISAPPROVED OF THE SECURITIES THAT WILL BE ISSUED IN THE MERGER OR PASSED UPON THE ADEQUACY OR ACCURACY OF THIS JOINT PROXY STATEMENT/PROSPECTUS. ANY REPRESENTATION TO THE CONTRARY IS A CRIMINAL OFFENSE.

THIS JOINT PROXY STATEMENT/PROSPECTUS IS DATED [ ], 2001,  
AND IS BEING FIRST MAILED TO STOCKHOLDERS ON OR ABOUT [ ], 2001.  
<PAGE> 3

This document incorporates important business and financial information about Radian and Enhance Financial Services that is not included in or delivered with this document. This information is available without charge to stockholders upon written or oral request at the applicable company's address and telephone number listed on page 4. To obtain timely delivery, stockholders must request the information no later than [ ], 2001.  
<PAGE> 4

EXHIBIT B – 24  
 HSBC BANK USA LAST SEC FILING

The screenshot displays the SEC Edgar search results for HSBC Bank USA. The page includes a search bar at the top, navigation links, and a table of filings. The table lists various quarterly reports filed by institutional managers, including filing dates and file numbers.

**HSBC BANK USA CIK#: 0000315053 (see all company filings)**

State location: NY  
 formerly: REPUBLIC NATIONAL BANK OF NEW YORK (filings through 1999-07-27)

Business Address: ONE HANSON PLACE #801 BROOKLYN NY 11243 2126192602  
 Mailing Address: ONE HANSON PLACE #801 BROOKLYN NY 11243

Filter Results: Filing Type: Prior to: (YYYYMMDD) Ownership?  include  exclude  only Limit Results Per Page: 40 Entries Search Show All

Filings	Format	Description	Filing Date	File/Film Number
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-01-000001 Size: 30 KB	2001-01-22	<a href="#">028-00854</a> <a href="#">1512343</a>
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-00-000005 Size: 31 KB	2000-10-24	<a href="#">028-00854</a> <a href="#">744663</a>
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-00-000004 Size: 32 KB	2000-07-10	<a href="#">028-00854</a> <a href="#">669767</a>
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-00-000003 Size: 31 KB	2000-04-10	<a href="#">028-00854</a> <a href="#">597204</a>
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-00-000001 Size: 34 KB	2000-01-12	<a href="#">028-00854</a> <a href="#">506118</a>
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-99-000011 Size: 34 KB	1999-12-03	<a href="#">028-00854</a> <a href="#">99768447</a>
13F-HR	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Holdings Acc-no: 0000315053-99-000007 Size: 39 KB	1999-07-27	<a href="#">028-00854</a> <a href="#">99670674</a>

<http://www.sec.gov/cgi-bin/browse-edgar>

## EXHIBIT B – 25

### New Jersey Department of Banking and Insurance: NJ's Predatory Lending Law Protecting Consumers

1/16/2015

NJ Predatory Lending Law Protecting Consumers

## News Release

New Jersey Department of  
Banking and Insurance  
Commissioner Holly C. Bakke

*For Immediate Release: December 21, 2004*

*For Further Information: Winnie Fendus or Marshall McKnight - (609) 292-5064*

### New Jersey's Predatory Lending Law Protecting Consumers

TRENTON – New Jersey Department of Banking and Insurance Commissioner Holly C. Bakke wants consumers to know that work is well under way to implement the state's predatory lending law. The Department's goal has been, and continues to be, to protect consumers by assuring that lenders are here to serve them while eliminating predatory practices. Since the law took effect, the number of complaints the Department suspects as predatory or deceptive has dropped by more than 33 percent.

"The State of New Jersey is a national leader in the fight to stop predatory lending," said Acting Governor Richard J. Codey. "A growing number of states have passed such laws. Thanks to our strong predatory lending law, New Jersey continues to serve and protect consumers."

Known as the New Jersey Homeowners Security Act, the law was signed in May 2003 and took effect in November 2003. The law, a result of ongoing consultations with consumer groups and lenders, provides substantial protection against abusive provisions in high-cost loans, the most flagrant of predatory practices.

Predatory lending is the use of unfair and abusive mortgage lending practices that result in a borrower paying more through high fees or interest rates than the borrower's credit history warrants. Due to the complexity of mortgage transactions, it is often difficult for individuals to tell the difference between a legitimate and predatory loan.

"Our predatory lending law, including the recent amendment, appears to be working to provide a competitive market for New Jersey's consumers and a fair place for lenders to do business," Commissioner Bakke said. "New lenders have entered the marketplace and the state's mortgage loan market continues to be very active."

From December 2002 to November 2003 the Department received 560 suspected predatory complaints. Since the new law began in November 2003, the number of complaints the Department suspects as predatory or deceptive has dropped by nearly 36 percent. The Department received 360 such complaints from December 2003 through November 2004.

While the Department recovers more than \$1 million for consumers every year, enforcement fines have decreased since the new law began. In 2003, the Department collected approximately \$850,000 in fines from licensed lenders. As of November 2004 the figure has dropped to \$550,000.

While the drop in national lending volumes could cause a proportional drop in complaints and fines, part of the reduction is likely due to the Department's participation with industry groups and licensed lenders to explain how to comply with the new law. The Department also joined community groups in educating urban area consumers on how to avoid predatory loans.

## EXHIBIT B – 25 cont'd.

### New Jersey Department of Banking and Insurance: NJ's Predatory Lending Law Protecting Consumers

1/19/2015

NJ Predatory Lending Law Protecting Consumers

While complaints against state licensed lenders have decreased, complaints against federally chartered lenders have increased. From December 2002 to November 2003, the Department received and referred 691 of these federal complaints. The Department received and referred 736 federal complaints from December 2003 through November 2004.

"Our well-balanced law significantly reduces predatory lending," said H. Robert Tillman, director of the Division of Banking. "It is still too early to feel the full effect of the law, but it appears that our state banks and licensed lenders have prepared for the new law and have helped create a more competitive market. Unfortunately, most federally chartered banks and lenders issuing high-cost loans have not been willing to comply with state predatory lending laws."

The law was amended in July when, among other changes, the high-cost loan threshold for points and fees was lowered from 5 percent to 4.5 percent. The amendments pleased consumer and trade groups because they allowed access to as much as \$1 billion more in credit while providing the opportunity for more credit counseling.

"A number of lenders who had left the market primarily due to the original New Jersey Homeowners Security Act have since come back into the market as a result of the amendment to the law," said E. Robert Levy, executive director and counsel, Mortgage Bankers Association of New Jersey.

In 2004, the Department has approved 429 new licensed entities/individuals and 963 new branches.

"The American Association of Retired Persons-New Jersey fully supports the New Jersey Homeowners Security Act and the exemplary work of the Department of Banking and Insurance to protect consumers from predatory lending," said Jim Dieterle, AARP state director. "The New Jersey Homeowners Security Act is one of the best in the nation."

"It's a great law. It provides a strong consumer protection to low- and moderate-income borrowers," said Phyllis Salowe-Kaye, executive director of New Jersey Citizen Action, the state's largest consumer watchdog organization. "We have to make sure that it's not pre-empted by Congress and federal regulators."

National financial services companies and federally chartered banks provide a substantial portion of the state's mortgage loans and many of them claim exemption from New Jersey's predatory lending law. Some press reports have speculated that the federal government will enact a nationwide predatory lending law in 2005.

"We welcome a federal predatory lending law," said Director Tillman. "As long as it provides adequate consumer protections."

For more information on predatory lending, go to the Department's web site at [www.state.nj.us/dobi/dobi/division\\_consumers/finance/predatory.html](http://www.state.nj.us/dobi/dobi/division_consumers/finance/predatory.html). If you feel you're a victim of predatory lending, call the Division of Banking at (609) 292-7272.

**EXHIBIT B – 26**  
**Deloitte & Touche Report on Litton Loan Filed With SEC**

Deloitte

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Suite 2300  
333 Clay Street  
Houston, TX 77002-4196  
USA  
Tel: +1 713 982 2000  
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www.deloitte.com

Report of Independent Registered Public Accounting Firm

To the Partners of Litton Loan Servicing LP:

We have examined management's assertion that Litton Loan Servicing LP (the Company) has complied as of and for the year ended December 31, 2004, with its established minimum servicing standards described in the accompanying Management Assertion Report dated February 16, 2005. Management is responsible for the Company's compliance with those minimum servicing standards. Our responsibility is to express an opinion on management's assertion about the Company's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants as adopted by the Public Company Accounting Oversight Board (United States) and, accordingly, included examining, on a test basis, evidence about the Company's compliance with its minimum servicing standards and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. Our examination does not provide a legal determination on the Company's compliance with its minimum servicing standards.

In our opinion, management's assertion that the Company complied with the aforementioned minimum servicing standards as of and for the year ended December 31, 2004, is fairly stated, in all material respects based on the criteria set forth in Appendix I.

/s/: Deloitte & Touche LLP  
Deloitte & Touche LLP  
February 16, 2005

EXHIBIT B – 27

FREMONT HOME LOAN TRUST 2006-C (Subject) (Ex-B-27: CIK: [0001373810](#) Initial SEC filing by FREMONT MORTGAGE SECURITIES CORP (Filed by) Ex-B-27: CIK: [0001099390](#)  
**FREMONT HOME LOAN TRUST 2006-C**



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**FREMONT HOME LOAN TRUST 2006-C** CIK#: [0001373810](#) (see all company filings)  
 SIC: 6189 - ASSET-BACKED SECURITIES Business Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808, 7142836500 Mailing Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808  
 State location: CA | State of Inc.: DE | Fiscal Year End: 1231 (Assistant Director Office: 5)

Filter Results: Filing Type: Prior to: (YYYYMMDD) 20070110 Ownership?  include  exclude  only Limit Results Per Page: 40 Entries Search Show All

Items 1 - 8 [RSS Feed](#)

Filings	Format	Description	Filing Date	File/Film Number
10-D	<a href="#">Documents</a>	Asset-Backed Issuer Distribution Report [Section 13 or 15(d) of the Securities Exchange Act of 1934] Acc-no: 0001056404-07-000433 (34 Act) Size: 183 KB	2007-01-10	333-132540-02 07523440
8-K	<a href="#">Documents</a>	Current report, items 5.03 and 9.01 Acc-no: 0001056404-06-004389 (34 Act) Size: 23 KB	2006-12-19	333-132540-02 061265490
10-D	<a href="#">Documents</a>	Asset-Backed Issuer Distribution Report [Section 13 or 15(d) of the Securities Exchange Act of 1934] Acc-no: 0001056404-06-004284 (34 Act) Size: 205 KB	2006-12-12	333-132540-02 061271030
10-D	<a href="#">Documents</a>	Asset-Backed Issuer Distribution Report [Section 13 or 15(d) of the Securities Exchange Act of 1934] Acc-no: 0001056404-06-003836 (34 Act) Size: 206 KB	2006-11-09	333-132540-02 061200093
8-K	<a href="#">Documents</a>	Current report, items 8.01 and 9.01 Acc-no: 0000950124-06-005403 (34 Act) Size: 2 MB	2006-09-20	333-132540-02 061100499
8-K	<a href="#">Documents</a>	Current report, items 8.01 and 9.01 Acc-no: 0000950124-06-005168 (34 Act) Size: 28 KB	2006-09-11	333-132540-02 061084841
424B5	<a href="#">Documents</a>	Prospectus [Rule 424(b)(5)] Acc-no: 0000950124-06-004941 (33 Act) Size: 4 MB	2006-08-31	333-132540-02 061066651
FWP	<a href="#">Documents</a>	Filing under Securities Act Rules 163/433 of free writing prospectuses Acc-no: 0000950124-06-004794 (34 Act) Size: 5 MB	2006-08-25	333-132540-02 061054015

<http://www.sec.gov/cgi-bin/browse-edgar>

**FREMONT HOME LOAN TRUST 2006-C INITIAL SEC FILING**



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Form FWP - Filing under Securities Act Rules 163/433 of free writing prospectuses SEC Accession No. 0000950124-06-004794

Filing Date: 2006-08-25  
 Accepted: 2006-08-24 20:16:32  
 Documents: 5

Document Format Files

Seq	Description	Document	Type	Size
1	FREEWRITING PROSPECTUS	v23280fwp.htm	FWP	3108810
2	GRAPHIC	v23280v2328000.gif	GRAPHIC	2994
3	GRAPHIC	v23280v2328001.gif	GRAPHIC	3748
4	GRAPHIC	v23280v2328002.gif	GRAPHIC	13377
5	GRAPHIC	v23280v2328003.gif	GRAPHIC	26314
Complete submission text file		0000950124-06-004794.txt		3175261

**FREMONT MORTGAGE SECURITIES CORP** (Filed by) CIK: [0001099390](#) (see all company filings)  
 IRS No.: 000000000 | State of Incorp.: DE | Fiscal Year End: 1231 Business Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808, 7142836500 Mailing Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808  
 Type: FWP  
 SIC: 6189 Asset-Backed Securities (Assistant Director Office: 5)

**FREMONT HOME LOAN TRUST 2006-C** (Subject) CIK: [0001373810](#) (see all company filings)  
 State of Incorp.: DE | Fiscal Year End: 1231 Business Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808, 7142836500 Mailing Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808  
 Type: FWP | Act: 34 | File No.: 333-132540-02 | Film No.: 061054015  
 SIC: 6189 Asset-Backed Securities (Assistant Director Office: 5)

**FREMONT MORTGAGE SECURITIES CORP**



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**FREMONT MORTGAGE SECURITIES CORP** CIK#: [0001099390](#) (see all company filings)  
 SIC: 6189 - ASSET-BACKED SECURITIES Business Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808, 7142836500 Mailing Address: 175 NORTH RIVERVIEW DRIVE, ANAHEIM CA 92808  
 State location: CA | State of Inc.: DE | Fiscal Year End: 1231 (Assistant Director Office: 5)

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Filings	Format	Description	Filed/Effective	File/Film Number
8-K	<a href="#">Documents</a>	Current report, items 8.01 and 9.01 Acc-no: 0000950124-06-007717 (34 Act) Size: 2 MB	2006-12-20	333-91565 061269439
424B5	<a href="#">Documents</a>	Prospectus [Rule 424(b)(5)] Acc-no: 0000950124-06-007383 (33 Act) Size: 4 MB	2006-12-07	333-132540 061253479
8-K	<a href="#">Documents</a>	Current report, items 8.01 and 9.01 Acc-no: 0000950124-06-007347 (34 Act) Size: 32 KB	2006-12-06	333-91565 061260054
FWP	<a href="#">Documents</a>	Filing under Securities Act Rules 163/433 of free writing prospectuses Acc-no: 0000950124-06-007064 Size: 3 MB	2006-11-21	
FWP	<a href="#">Documents</a>	Filing under Securities Act Rules 163/433 of free writing prospectuses Acc-no: 0000950124-06-007063 Size: 39 KB	2006-11-21	
8-K	<a href="#">Documents</a>	Current report, items 8.01 and 9.01 Acc-no: 0000950137-06-012610 (34 Act) Size: 2 MB	2006-11-17	333-91565 061226999

EXHIBIT B – 28  
FDIC CEASE AND DESIST ORDER TO FREMONT INVESTMENT & LOAN

*The New York Times*



**WASHINGTON** — U.S. bank regulators have ordered Fremont Investment & Loan, a major lender in the troubled subprime home-mortgage business, to tighten its loan policies and operations to avoid future losses from defaults by borrowers.

The move is the first by federal regulators against an individual institution related to the recent turmoil in the market for subprime mortgages — higher- interest loans for people with blemished credit records or low incomes who are considered to be higher risks.

The Federal Deposit Insurance Corp. announced the cease-and-desist order with Fremont Investment, a bank based in Brea, California, and its parent companies, Fremont General and Fremont General Credit. The companies agreed to comply with the order without admitting or denying the FDIC's allegation that Fremont Investment was operating "without effective risk-management policies and procedures" in its subprime mortgage and commercial real-estate lending operations.

The FDIC said it had found that, among other things, the bank was making subprime mortgage loans without having the proper criteria for assessing borrowers' ability to repay, and that it was marketing and making the loans "in a way that substantially increased the likelihood of borrower default or other loss to the bank."

Fremont General said recently it was getting out of subprime mortgage lending and had been in talks with potential buyers of its home mortgage business.

Federal Deposit Insurance and other bank regulators, in general, have been worried recently about a surge in defaults on subprime home mortgages in an increasingly troubled market for them. The regulators called on lenders last week to exercise caution in making subprime loans and to strictly evaluate borrowers' ability to repay them.

"Our concern has always been that banks make loans that borrowers are able to repay," Sheila Bair, chairman of the FDIC, said. "We believe that the agreement with Fremont addresses this basic concern."

Mortgage delinquencies and foreclosures are spiking, especially among people who took out subprime mortgages during the sizzling housing boom that waned in the second half of 2005.

Several companies that specialize in subprime mortgages have seen their shares plummet in recent weeks.

EXHIBIT B – 29  
C-BASS SELLS LITTON LOAN TO GOLDMAN SACHS

From the Philadelphia Business Journal  
: <http://www.bizjournals.com/philadelphia/stories/2007/12/10/daily14.html>

## Radian, MGIC affiliate C-BASS sells servicing business

Dec 11, 2007, 12:48pm EST Updated: Dec 11, 2007, 12:53pm EST

The subprime mortgage lending affiliate of Radian Group Inc. has sold off a loan servicing business and will use proceeds to help pay off its creditors under an out-of-court restructuring agreement.

Credit-Based Asset Servicing and Securitization LLC (C-BASS) said it has completed the sale of Litton Loan Servicing to Goldman Sachs for an undisclosed price. The sale was part of a long-term agreement with secured and unsecured creditors reached Nov. 13.

C-BASS is a New York-based company that's regarded as a leading issuer, servicer and investor in credit-sensitive residential mortgage assets. It is a limited liability company capitalized by **MGIC Investment Corp.** (NYSE:MGIC) of Milwaukee, Radian (NYSE:RDN) of Philadelphia and C-BASS management. MGIC and Radian are mortgage insurers.

Terms of the deal were not disclosed.

The recent turmoil in the subprime lending industry resulted in an unprecedented amount of margin calls from its lenders. The frequency and magnitude of the calls adversely affected the firm's liquidity. As a result, MGIC and Radian took write-offs to reflect the reduced value of their investment in C-BASS.

In August 2007, C-BASS hired The Blackstone Group to assist in solving its liquidity challenges. The Blackstone Group, working with management and Hunton & Williams, C-BASS' legal advisers, created a solution that allowed the company to reach a consensual out-of-court restructuring with all its creditors.

The agreement provides a framework for the company to manage its portfolio assets, allowing the underlying cash flow to repay the secured and unsecured creditors of C-BASS over time.



**EXHIBIT B – 30**  
**SEC LAUNCHES PROBE OF MGIC, RADIANT**

From the Milwaukee Business Journal  
: <http://www.bizjournals.com/milwaukee/stories/2007/11/19/daily20.html>

## **SEC launches probe of MGIC, Radian**

Nov 21, 2007, 10:29am CST Updated: Nov 21, 2007, 10:31am CST

The U.S. Securities and Exchange Commission is seeking additional information from MGIC Investment Corp. and Radian Group Inc. under an investigation into their failed merger and their relationship with a subprime lending affiliate.

Both mortgage insurance providers confirmed the investigation in separate quarterly reports filed Wednesday.

Milwaukee-based MGIC (NYSE: MTG) said only that in October, the Division of Enforcement of the SEC requested documents related to Credit-Based Asset Servicing and Securitization LLC (C-BASS), the now-terminated merger with Radian and subprime mortgage assets "in the company's various lines of business."

Radian said it received a letter Oct. 3 from the SEC's Chicago office stating that the staff is conducting an investigation. Staff of the SEC told Radian officials that the investigation "should not be construed as an indication by the Commission or its staff that any violation of the securities laws has occurred, or as a reflection upon any person, entity or security," according to the Radian filing.

Both companies said they are cooperating with the SEC's requests.

The meltdown of the subprime mortgage industry caused both firms to write off their total investment of more than \$1 billion in C-BASS. The rattled credit markets also led to the scuttling of a proposed merger of MGIC and Philadelphia-based Radian (NYSE: RDN) in September. MGIC and Radian had announced plans to merge in February, with MGIC acquiring Radian Group in a \$4.9 billion transaction.

EXHIBIT B – 31  
FINANCIAL INDUSTRY NOT FOOLED BY PILFERING OF BIG BANKS

# Rising Rates to Worsen Subprime Mess

## Interest Payments Set To Grow on \$362 Billion In Mortgages in 2008

By RUTH SIMON

Updated Nov. 24, 2007 11:59 p.m. ET

The subprime mortgage crisis is poised to get much worse.

Next year, interest rates are set to rise -- or "reset" -- on \$362 billion worth of adjustable-rate subprime mortgages, according to data calculated by Bank of America Corp.

While many accounts portray resetting rates as the big factor behind the surge in home-loan defaults and foreclosures this year, that isn't quite the case. Many of the subprime mortgages...

[TO VIEW FULL ARTICLE CLICK HERE](#) OR READ IT BELOW

Next year, interest rates are set to rise -- or "reset" -- on **\$362 billion** worth of adjustable-rate subprime mortgages...

While many accounts portray resetting rates as the big factor behind the surge in home-loan defaults and foreclosures this year, that isn't quite the case. **Many of the subprime mortgages that have driven up the default rate went bad in their first year or so, well before their interest rate had a chance to go higher.** Some of these mortgages went to speculators who planned to flip their houses, others to borrowers who had stretched too far to make their payments, and still others had some element of fraud.

Now the real crest of the reset wave is coming, and that promises more pain for borrowers, lenders and Wall Street. Already, many subprime lenders, who focused on people with poor credit, have gone bust. Big banks and investors who made subprime loans or bought securities backed by them are reporting billions of dollars in losses.

The reset peak will likely add to political pressure to help borrowers who can't afford to pay the higher interest rates. **The housing slowdown is emerging as an issue in both the presidential and congressional races for 2008, and the Bush administration is pushing lenders to loosen terms and keep people from losing their homes...**

...Larry Litton Jr., chief executive of Litton Loan Servicing, says resetting of adjustable-rate mortgages, or ARMs, has recently emerged as a bigger driver of defaults. "The initial wave was largely driven by a higher frequency of fraudulent loans...and loose underwriting..."

More than half of the subprime delinquencies and foreclosures this year involved loans that hadn't yet reset, and thus were due to factors such as weak underwriting and falling home prices...

[TO VIEW FULL ARTICLE CLICK HERE](#)

EXHIBIT B – 32  
GOLDMAN TO CASH IN BIG TIME WITH LITTON LOAN

Loan Workout

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to Cash in Big Time With the Litton Loan

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- Inappropriate
- Repetitive
- Irrelevant

This is a very interesting purchase by Goldman Sachs. The question that many people will ask is "why the hell would anyone want to buy a company that services a tremendous amount of adjustable rate mortgages, AKA, supprime slime?"

Because servicing subprime mortgages is a very profitable business, that's why!

Take this quote for [Bloomberg](#):

Subprime loans are made to people who have weak credit. With home lenders refusing to refinance borrowers who might default, the loans stay in the portfolio longer,

making them more valuable," Richard Bove, an analyst at Funk, Ziegel Co., said in an interview last month when the Litton sale was announced.

What he is essentially saying is that borrowers are "trapped" in these loans and they will not be going anywhere anytime soon. So, we are going to capitalize on these "weak" and less credit "worthy" subprime borrowers because they can't refinance, thus we can milk every damn dime we can to increase our bottom line before they default and eventually we foreclose on them.

It's not over yet, boys and girls.

Then we'll send it to our REO servicing division, where we will continue to make big money because that property is sure not going to sell anytime soon and in fact, it may be years before that over priced home sells. Thus, the money will be rolling for years to come.

Money was made by the truck loads when these toxic loans were originated by lenders and then packaged and sold on Wall Street. There's not a whole lot of that happening right now, so now, the money is in servicing them.

That's an easy prediction, given today's current real estate market, that is only getting worse by the second.

Remember [Moe](#), tells it like it is. In middle class laymen's terms. This is just a simple capitalistic business formula and these guys sure are capitalists. Right? Their business is to make money, regardless of how it's done, as long as it's all within the scope of the law and to be honest, that is being questioned by many [mortgage](#) servicing industry watchdogs like myself.

More from [Bloomberg](#):

Credit-Based Asset Servicing and Securitization LLC, a subprime mortgage investor written off by its owners, completed the sale of its Litton Loan Servicing business and named Goldman Sachs Group Inc. as the buyer.

The sale allowed C-Bass to reach an out-of-court restructuring with its creditors, the New York-based company said in a statement today. [Litton Deals with Homeowners on behalf of mortgage companies if the borrowers](#)

## EXHIBIT B – 32 cont'd. GOLDMAN TO CASH IN BIG TIME WITH LITTON LOAN

don't pay their bills on time. While terms weren't announced today, Radian Group Inc., part owner of C-Beas, said last month the unit would be sold for about \$457.8 million to an unnamed acquirer.

Goldman, the world's largest securities firm, may be betting it can pick up Litton at a depressed price. C-Beas's owners wrote off their entire equity investment of more than \$200 million this year, even while Litton continued to operate. Chief Financial Officer David Vinter said in September that his firm was hunting for "distressed assets."

The reason why Goldman bought Litton Loan Servicing.

Goldman bought the company "because it's a recognized leader in the loan-servicing sector," said Michael DuVelly, spokesman for the New York-based securities firm. "Given the stress in the residential mortgage market, a premium is being placed on quality workout-servicing capabilities, for which Litton is very well-known."

C-Beas was among more than 100 mortgage lenders and investors forced to halt operations or find buyers in 2007 amid the worst housing slump in 18 years. Its majority owners were MGIC Investment Corp. and Radian, the nation's No. 1 and No. 3-ranked mortgage insurers.

Blackstone Group LP advised C-Beas, which received legal counsel from Hurton and Williams.

Katie Monroe, a spokeswoman for Milwaukee-based MGIC, Tim Lynch a spokesman for Philadelphia-based Radian, and Peter Carwin, a spokesman for New York-based C-Beas, didn't return voicemail messages left after business hours.

I suspect will see many more acquisitions, massive consolidations and some very unlikely alliances forming in the near future.

### Related News

- [Goldman Sachs Said to Be Poised to Sell Litton Mortgage Business to Cowi](#)
- [Litton Loan Servicing, an Affiliate of Goldman Sachs, Closes Deal on Fremont General's Servicing Rights](#)
- [Goldman contemplating sale of Litton Mortgage Loan Servicing unit](#)
- [Goldman Closes the Door on Subprime](#)
- [NY Fed Probing Goldman Mortgage Servicing Unit](#)



## EXHIBIT B – 33 HSBC DUMPS TENS OF BILLIONS OF DOLLARS IN MORTGAGES

### HSBC set to dump loans in 'bad bank'

HSBC investors are hoping the bank will be able to dump approximately \$40billion (£21.8billion) of American sub-prime mortgages into the \$800billion US government fund created last week to bail out banks hit by bad debts.

By **GEOFF HO** Published: 00:00, Sun, September 21, 2008



### HSBC set to dump loans in 'bad bank'

HSBC investors are hoping the bank will be able to dump approximately \$40billion (£21.8billion) of American sub-prime mortgages into the \$800billion US government fund created last week to bail out banks hit by bad debts.

[TO VIEW FULL ARTICLE CLICK HERE](#)



Details of the radical "bad bank" plan, the brainchild of US Treasury secretary Hank Paulson, are still being hammered out this weekend.

As things stand, the bail-out fund is going to be made available only to US banks. However, because banking giant HSBC owns US sub-prime lender Household, which it bought for \$14.2billion in 2002, it is understood the US government is considering making an exception for the bank.

"Potentially, what we have here is a fantastic bail-out," one of HSBC's institutional investors said.

"The question the US is looking at is whether or not Household is an American company, given that its parent company is a British bank."

### HSBC in new sub-prime writedown

Europe's biggest bank HSBC has written off \$3.2bn (£1.6bn) in the first three months of 2008 as a result of its exposure to the US sub-prime market.



The writedowns, which are lower than the total written off in the final quarter of 2007, are in line with what the bank had predicted.

HSBC now stands behind Citibank, UBS and Merrill Lynch as the banks with the largest value of writedowns.

[TO VIEW FULL ARTICLE CLICK HERE](#)

The screenshot shows a BBC News article from Monday, 12 May 2008. The article title is "HSBC in new sub-prime writedown". The main text states: "Europe's biggest bank HSBC has written off \$3.2bn (£1.6bn) in the first three months of 2008 as a result of its exposure to the US sub-prime market." It further notes that the writedowns are lower than the total written off in the final quarter of 2007 and that HSBC now stands behind Citibank, UBS, and Merrill Lynch as the banks with the largest value of writedowns. A sidebar on the left lists various news categories like Africa, Americas, and Business. A small image of the HSBC logo on a globe is also visible in the article content.

EXHIBIT B – 33 cont'd.  
HSBC DUMPS TENS OF BILLIONS OF DOLLARS IN MORTGAGES

## HSBC's Billion-Dollar Bomb



Published: 11/10/2011 10:45 am EST

By: [Igor Greenwald](#) Financial Columnist, *The Energy Strategist*

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<http://www.moneyshow.com/articles.asp?id=GUFI25326>

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[http://proofhearing.org/proof/2011/11/10/HSBC\\_Billion-Dollar-Bomb\\_MoneyShow.pdf](http://proofhearing.org/proof/2011/11/10/HSBC_Billion-Dollar-Bomb_MoneyShow.pdf)

[TO VIEW FULL ARTICLE CLICK HERE](#)

## EXHIBIT B – 34

### NEW JERSEY ATTORNEY GENERAL ANNOUNCES MORTGAGE FRAUD LAWSUITS

#### Attorney General Announces Mortgage Fraud Lawsuits

July 15, 2009

by [New Jersey RealEstateRama](#)

[Government and Public Real Estate News](#), [Business News](#), [Housing News](#), [Legal News](#), [Mortgage News](#), [Real Estate News](#)

TRENTON, NJ – July 15, 2009 – (RealEstateRama) — Continuing the State's effort to combat mortgage-related fraud, Attorney General Anne Milgram announced today the filing of two new lawsuits charging a total of 10 individual and corporate defendants with selling bogus loan modification services to distressed homeowners.

Defendants in the two unrelated cases are charged with collecting unlawful "up-front" fees for loan modification services that either never materialized or made homeowners' situations worse. The defendants also are charged with misleading consumers through false advertising and deceptive solicitations, and engaging in debt adjustment activity without a license.

In one of the two lawsuits, the defendants also are accused of violating federal law governing credit repair activity, and with founding a non-profit "financial advocacy council" solely to legitimize their fraudulent enterprises. The state has identified 42 homeowners victimized by the latest schemes.

"The conduct charged in these two cases is outrageous. It epitomizes the kind of callous, greedy and opportunistic fraud we are committed to halting," said Attorney General Milgram. "In both cases, the defendants took advantage of desperate people who looked to them for help. They gained the trust of their victims through deceptive advertising and misleading sales pitches, then collected thousands of dollars in unlawful fees and provided nothing in return but empty promises and added financial misery. We intend to hold these defendants accountable."

"Loan modification services are supposed to serve as a lifeline to homeowners facing foreclosure, but instead the unscrupulous operators in these cases used these programs to cheat struggling families and make a profit," said New Jersey Department of Banking and Insurance Commissioner Steven M. Goldman. "This type of activity is particularly reprehensible when it occurs in tough economic times when people are fighting to stay in their homes and are especially vulnerable."

With the lawsuits announced today, the state has filed a total of 11 civil mortgage fraud complaints since June 2008 naming 102 individual and corporate defendants, affecting more than 350 victims and property worth more than \$29.1 million. The state has also obtained indictments or guilty pleas in seven criminal mortgage fraud cases involving a total of 10 defendants who were charged with victimizing close to 60 individuals and banks in connection with loans worth nearly \$11 million.

The conduct charged in the state's civil and criminal cases has included fraud that victimized people seeking to obtain loans through a broker, or seeking to own investment properties. Victims have also included those hopeful of improving their living situations via "rent-to-own" opportunities, as well as financially-desperate homeowners in need of loan modification help.

Named as defendants in one of the State's new lawsuits are Ejike N. Uzor, a licensed attorney who lists offices in Linden and Newark, and Stephen Pasch of Green Brook Township, Somerset County. Charged in the same lawsuit are corporate defendants New Day Financial Solutions, a Newark-based company owned and operated by Pasch, and three other Pasch companies: NDRCA, Inc., which operates from Pasch's home in Green Brook Township, American Credit Repair and Settlement, L.L.C., and Paramount Debt Settlement USA, L.L.C., both of which operate from the same address as Pasch's New Day Financial at 701 McCarter Highway, Suite 303, Newark.



## EXHIBIT B – 34 cont'd.

### NEW JERSEY ATTORNEY GENERAL ANNOUNCES MORTGAGE FRAUD LAWSUITS

Also named as corporate defendants are two Uxor companies: Uxor Financial Solutions, LLC and Ejike N. Uxor and Associates. Both companies list the same corporate address on McCarter Highway in Newark as the multiple companies run by Pasch. The American Financial Advocacy Council, a registered non-profit which lists both Pasch and Uxor as officers, is also named as a defendant. The complaint charges that American Financial functions as nothing more than a tool to further the fraudulent activities of Pasch and Uxor.

The State's other new lawsuit names as a defendant Best Interest Rate Mortgage Company (BIRMCO), located on Haddon Avenue in the Westmont section of Haddon Township, Camden County.

Although the approach used by BIRMCO to defraud customers was different – the company used direct mail solicitations while defendants in the New Day lawsuit used Web-based advertising, radio ads and telephone outreach — the outcome was the same: homeowners seeking loan modification help were induced, through misleading promotional materials and deceptive sales pitches, to pay BIRMCO thousands of dollars in advance fees and got either nothing in return, or ultimately saw their financial situations become worse.

Details of the State's two complaints are as follows:

**Mlignem v. New Day Financial Solutions, etc.** Filed in New Jersey Superior Court in Essex County, the State's seven-count complaint charges individual defendants Pasch and Uxor — along with seven corporations operated by Pasch, Uxor or both — with violating New Jersey's Consumer Fraud Act. The complaint also charges violation of state advertising regulations, the New Jersey Debt Adjustment and Credit Counseling Act and the Federal Credit Repair Organizations Act.

The suit also charges that the American Financial Advocacy Council was essentially a ploy to encourage consumer confidence in the services of Pasch and Uxor and their companies, through bogus "independent" recommendations made by the "non-profit."

According to the State's complaint, Pasch's New Day Financial operated from at least September 2008 through March 2009, charging customers thousands of dollars – payable in advance – for loan modification services, and offering a "100 percent money-back guarantee" if the company failed to deliver. New Day representatives urged customers to stop making mortgage payments while the company sought loan modification on their behalf. The complaint charges that, typically, New Day failed to obtain loan modification for its customers, and in many instances put them in worse financial standing by instructing them to stop paying their mortgages.

The experiences of four different New Day victims, including three from New Jersey, are described in the complaint. In one case, a Sayreville woman paid New Day \$2,500 for loan modification help and later learned her lender had no record of any contact with New Day. The woman, who had coincidentally received a loan modification offer from her lender, asked New Day for a refund after learning the company had done nothing for her, but never received one.

In another case, a woman from Howell paid \$4,200 for New Day's services in September 2008. She was instructed to make her check payable to Pasch's company, NDRCA. In early 2009, the woman received a letter from her mortgage company indicating that no loan modification review could begin because required documentation had not been provided. The woman tried repeatedly to contact New Day, but was unable to reach a representative except for one time, when she was instructed to be patient. Ultimately, the woman worked directly with her lender to modify her loan, but New Day never refunded her \$4,200.

According to the State's lawsuit, New Day posted notice on its Web site in March 2009 that it would no longer be soliciting loan modification clients. It was around that time, the lawsuit asserts, that the other defendant corporations belonging to Pasch and Uxor – including the non-profit American Financial Advocacy Council — formed and began soliciting loan modification and other debt-adjustment-related business.

According to the complaint, Pasch's American Credit Repair and Debt Settlement, and his company Paramount Debt Settlement USA, as well as Uxor and Associates, jointly began operating a Web site called [www.creditrepair199.com](http://www.creditrepair199.com). The Web site offers credit repair and debt adjustment services, and provides a phone number to call to obtain such services. The same Web site advises consumers that they will be charged an "application/enrollment fee" of \$199 per individual and \$319 per couple, plus a \$79-a-month service fee. (It is illegal in New Jersey to charge for credit repair services not yet rendered.)

The lawsuit also charges that the Pasch/Uxor "non-profit" American Financial Advocacy Council — through its Web site at [www.loanadvmyhome.com](http://www.loanadvmyhome.com) — has sought to instill consumer confidence in the defendants' bogus, for-profit operations. The complaint quotes the Web site as saying American Financial works "with a select group of Christian-owned companies that are able to assist consumers who are experiencing financial hardships." The same Web site provides links to the Web sites of Pasch's companies American Credit Repair and Debt Settlement and Paramount Debt Settlement USA, as well as the Uxor companies Uxor Financial Solutions, LLC and Uxor and Associates. None of the companies are licensed debt adjusters.

Among other things, the State's lawsuit against Pasch, Uxor and the other defendants seeks to dissolve the non-profit American Financial, and asks the court to order a halt to the defendants' unlawful business practices. It also seeks restitution for consumers and the imposition of maximum civil penalties.

**Mlignem v. Best Interest Rate Mortgage Company (BIRMCO):** Filed in Superior Court in Mercer County, the State's four-count complaint charges BIRMCO with violating the Consumer Fraud Act, state advertising regulations and the New Jersey Debt Adjustment and Credit Counseling Act. According to the complaint, BIRMCO is a state-licensed mortgage lender, but has no state license to conduct debt adjustment activity.

Despite having no license, BIRMCO has solicited loan modification customers since at least November 2008, typically by sending distressed homeowners direct mail solicitations that appear to have been sent by a government agency. The mailings describe the targeted homeowner's specific mortgage information, discuss the availability of various government programs to help financially-strapped mortgage holders, and include a telephone number to call for further information. The telephone number is actually for BIRMCO, although the company's name appears nowhere on the original mailing.

Once a consumer calls the number, he or she is promised that BIRMCO can negotiate a loan modification resulting in a lower interest rate and lower monthly payments. Consumers who accept the offer are charged an up-front fee of several thousand dollars and must sign a contract, but they are promised a refund if BIRMCO fails to obtain a loan modification. They are also told to stop making mortgage payments and to avoid contacting their lenders, purportedly to strengthen their position in seeking loan modification.

In fact, the State's lawsuit charges, BIRMCO often does little or no work toward obtaining loan modification for its clients. The suit contends that clients who hire BIRMCO and heed the company's advice to stop making mortgage payments end up learning – typically through a call from their lenders – that they are not only delinquent on their mortgages, but that nothing has been done to modify their loans. Ultimately, the suit charges, customers end up



**EXHIBIT B – 34 cont'd.**  
**NEW JERSEY ATTORNEY GENERAL ANNOUNCES MORTGAGE FRAUD LAWSUITS**

working directly with their lenders and obtaining loan modifications that would have been available in the first place.

Nonetheless, BIRMCO typically forwards a letter to the consumer afterward claiming credit for negotiating a beneficial modification. Customers who seek a refund after negotiating their own loan modifications or realizing BIRMCO did nothing for them usually either get nothing, or only a partial refund, the suit charges.

The State's complaint describes the experience of several BIRMCO victims, including a Belleville woman who paid the company \$2,900 up front and ended up with a loan modification that actually increased her mortgage payment by \$70 a month because she followed the company's advice to stop making mortgage payments. BIRMCO ultimately returned only half of her up-front fee.

As with the New Day complaint, the State's lawsuit against BIRMCO asks the court to order a halt to the defendants' unworkful business practices, seeks restitution for consumers and the imposition of maximum civil penalties.

The Attorney General urged any member of the public who has been a victim of mortgage-related fraud to report it by calling the Division of Consumer Affairs. New Jersey residents can call the toll-free hotline at 1-800-242-3846. Consumers from out of state can call 973-504-6200. Those seeking to file a complaint can also visit the Division's Web site at [www.njconsumeraffairs.gov](http://www.njconsumeraffairs.gov).

Milgram also reminded homeowners facing foreclosure that free help may be available to them through the state's foreclosure mediation program. She urged distressed homeowners to explore what help is available through the program by calling the toll-free hotline number at 1-800-989-5277 or visiting the Web site at [www.NJForeclosureMediation.org](http://www.NJForeclosureMediation.org). Through the foreclosure mediation program, qualified homeowners who are in danger of losing their homes can receive help from housing counselors, attorneys and a neutral mediator to resolve loan delinquencies.

Attorney General Milgram thanked Deputy Attorney General Megan Lewis, Chief of the Division of Law's Affirmative Litigation Section, Deputy Attorney General Jim Michael of the Affirmative Litigation Section, Deputy Attorney General Janine Matton of the Affirmative Litigation Section, Assistant Attorney General James J. Savage of the Division of Law, Deputy Attorney General Raymond Chance, Chief of the Division of Law's Banking and Insurance Section, Deputy Attorney General Gregory McHugh of the Banking and Insurance Section, Supervising Investigator Jennifer Misco, Investigator Jared O'Connell and Investigator Kevin Noland of the Division of Consumer Affairs, for their work on the loan modification cases announced today.

\*\*\*

EXHIBIT B – 35

HSBC MOVES HEADQUARTERS TO EVADE FINES FOR THEIR ACTIONS

*FROM US TO UK THEN HONG KONG*

Why HSBC Is Returning to Hong Kong By Michael Schuman / Hong Kong Wednesday, Sept. 30, 2009

TIME

Wednesday, Sep. 30, 2009

Why HSBC Is Returning to Hong Kong

By Michael Schuman / Hong Kong

Megabank HSBC has been as much a part of Hong Kong history as Victoria Harbor, high tea at the Peninsula Hotel and martial-arts movies. Founded in 1865 as the Hongkong and Shanghai Banking Corporation, HSBC backed some of city's most important businessmen, including tycoon Li Ka-shing, and remains Hong Kong's No. 1 bank. But for much of the past 20 years, HSBC has expended a lot of its energy striving to be more than an Asian institution. With major acquisitions in the U.K., the U.S. and elsewhere, HSBC grew into one of the world's largest banks, with a truly international footprint. Since 1993, the Hong Kong stalwart has had its global headquarters in London.

But now HSBC has realized home is where the heart — and the money — is. On Sept. 25, HSBC announced that its chief executive, Michael Geoghegan, will relocate his office back to Hong Kong in February, 2010. The decision is yet another sign of the growing economic influence of Asia. Calling Asia the bank's "strategically most important region," HSBC said in a statement that Geoghegan's move "further positions the Group for the shift in the world's center of economic gravity from West to East."

[TO VIEW FULL ARTICLE CLICK HERE](#)

HSBC 'must be sorely tempted' to make Hong Kong its HQ  
Richard Wachman Tuesday 13 September 2011

HSBC 'must be sorely tempted' to make Hong Kong its HQ

HSBC's next review on its domicile will be the most important in a generation



HSBC's Hong Kong headquarters. Its next review on its domicile will be the most important in a generation. Photograph: Yim Yik/EPA

[TO VIEW FULL ARTICLE CLICK HERE](#)

The head of UK fund management group Schroders has stoked fears HSBC could shift its headquarters from London to Hong Kong to escape wide-ranging banking reforms unveiled on Monday.

EXHIBIT B – 35 cont'd.  
HSBC MOVES HEADQUARTERS TO EVADE FINES FOR THEIR ACTIONS

FROM UK TO HONG KONG

HSBC delays decision on moving HQ until 2015 due to Vickers uncertainty  
Jill Treanor Monday 5 November 2012



## HSBC delays decision on moving HQ until 2015 due to Vickers uncertainty

Chairman Douglas Flint tells MPs banks have lost their 'right to self-determination' because of errors made in the past



[TO VIEW FULL ARTICLE CLICK HERE](#)

Douglas Flint said uncertainties caused by the Independent Commission on Banking and new European rules were affecting business decisions. Photograph: Bobby Yip/Reuters

Jill Treanor

Monday 5 November 2012 16.43 EST

HSBC delays decision on HQ relocation until UK banking rules are published  
By Josephine Moulds 6:00AM BST 09 May 2011

## The Telegraph

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Companies Comment Personal Finance ISAs Economy Markets Property Festival of Busi

HOME » FINANCE » NEWS BY SECTOR » BANKS AND FINANCE

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## HSBC delays decision on HQ relocation until UK banking rules are published

HSBC has delayed a decision on moving its headquarters out of London until next year, in order to digest the final recommendations from the Independent Commission on Banking (ICB).

**EXHIBIT B – 35 cont'd.**  
**HSBC MOVES HEADQUARTERS TO EVADE FINES FOR THEIR ACTIONS**

**WILL HONG KONG TAKE THEM BACK?**

Hong Kong Protests Put HSBC in Tough Position Oct 22, 2014

**THE WALL STREET JOURNAL.**  
WSJ.com

October 22, 2014, 8:18 PM HKT

## Hong Kong Protests Put HSBC in Tough Position



Demonstrators sit near a HSBC Holdings branch on Nathan Road in the Mong Kok area of Hong Kong Wednesday.  
Bloomberg News

For HSBC Holdings PLC, Hong Kong's pro-democracy protests can't end soon enough.

At various stages the U.K lender has been embroiled in the universal suffrage campaign in the former British Colony.

[TO VIEW FULL ARTICLE CLICK HERE](#)

## **THESE ARTICLES BRING TO MIND:**

A man always has two reasons for doing anything:  
a good reason and the real reason.

[J. P. Morgan](#)

Read more at <http://www.brainyquote.com/quotes/quotes/j/jpmorgan156089.html#jllmGYgkeLcxf6MG.99>

## LITTON LOAN AS VIEWED BY INDUSTRY

### *Profile by Standard & Poors*

Founded in 1988 by its current director, Larry Litton Sr., the company initially serviced prime mortgage loans and eventually migrated to distressed assets for the Resolution Trust Corp. (RTC). Applying the significant amount of expertise gained through these RTC contracts, management decided to focus its future business efforts on resolving seriously delinquent mortgages. In 1996, Litton was added to a newly formed investment company, C-BASS, as part of an initial investment made by Enhance Financial Services, its owner at the time. Enhance, which later was purchased by Radian Group Inc. (Radian), co-invested in C-BASS with MGIC Investment Corp. (MGIC) in July 1996 to form C-BASS LLC. MGIC and Radian each owned a 42% interest in C-BASS LLC, with the remainder owned by C-BASS senior management. C-BASS was a large purchaser of credit-sensitive assets, which consisted primarily of subprime mortgages. As an outgrowth of this strategy, Litton began servicing subprime accounts in 1998. Due to liquidity pressures, C-BASS LLC sold Litton to Goldman Sachs Group Inc. in December 2007. Previously, Litton was a division of the parent's industrial bank chartered in Utah, but it was realigned to become a division of Goldman Sachs Bank USA (GS Bank), which is state-chartered in New York. Management reports to an operational reporting committee of the bank. <http://www.standardandpoors.com/ratings/articles/en/us/%3FassetID%3D1245205476943> Publication date: 27-Jan-2010 11:00:04 EST

### **ONE OF OUR WITNESSES WILL LIKELY USE ONE OF THE DEFENDANTS' DOCUMENTS TO PROVE ROBO-SIGNING BY DEFENDANT(S)**

Litton Loan Problems Before 2009

#### **Robo-signed mortgage docs date back to late 1990s**

The Associated Press By The Associated Press

on September 01, 2011 at 9:28 PM, updated September 01, 2011 at 9:41 PM

#### **Arthur v. Litton Loan Servicing LP, 249 F. Supp. 2d 924 (E.D. Tenn. 2002)**

The defendants' alternative motion to quash service and set a deadline for the plaintiffs to effect service of process is GRANTED

#### **A Case Against Litton Loans Servicing LP By Andy Williams Jr**

The information in this book is written from the perspective of Andy Williams Jr. and his five years of research concerning industry mortgage servicing fraud and Litton Loans.

The purpose of this book is to expose the criminal enterprise and income derived from mortgage servicing fraud.

#### **Robo-Signing's Rich History: Dates Back to the Late 1990s**

By: [David Dayen](#) Friday September 2, 2011 7:30 am

EXHIBIT B – 37  
GOLDMAN SACHS FRAUD CHARGES

[TO VIEW ARTICLE CLICK HERE](#)

## COLUMBIA JOURNALISM REVIEW

12:13 PM - April 18, 2010

### Goldman Sachs Fraud Charges Are a Business-Press Win

By Ryan Chittum

The *New York Times*'s Louise Story and Gretchen Morgenson score a major scoop this morning with news that the SEC is charging Goldman Sachs with fraud over its structuring of CDOs, saying "the bank created and sold a mortgage investment that was secretly devised to fail."

This is a huge story. The SEC has found that its jaws still snap; Goldman, which has heretofore seemed virtually untouchable, is in the dock; it illustrates short-sellers'—John Paulson specifically here—role in creating the crisis and making billions off it; and the press and bloggers can claim a big victory, regardless of the ultimate outcome of the case. It also points the way to possible further SEC actions over the bank's similar dealings with Magnetar, which *ProPublica* detailed so impressively last week.

There's no doubt that press coverage was instrumental in this turn of events. On Christmas Eve, Morgenson and Story unleashed a terrific story zeroing in on how Goldman Sachs structured its Abacus deals so they would fail, all while betting against them.

As the Abacus deals plunged in value, Goldman and certain hedge funds made money on their negative bets, while the Goldman clients who bought the \$10.9 billion in investments lost billions of dollars.

The SEC is charging is that Goldman misled investors by telling them one company, called ACA, was managing the CDOs, when it was actually letting hedge-fund king Paulson pick bonds for it. Here's the SEC, from its [press release](#):

"The product was new and complex but the deception and conflicts are old and simple," said Robert Khuzami, Director of the Division of Enforcement. "Goldman wrongly permitted a client that was betting against the mortgage market to heavily influence which mortgage securities to include in an investment portfolio, while telling other investors that the securities were selected by an independent, objective third party."

And boy did Paulson know how to pick 'em:

According to the SEC's complaint, the deal closed on April 26, 2007, and Paulson & Co. paid Goldman Sachs approximately \$15 million for structuring and marketing ABACUS. By Oct. 24, 2007, 83 percent of the RMBS in the ABACUS portfolio had been downgraded and 17 percent were on negative watch. By Jan. 29, 2008, 99 percent of the portfolio had been downgraded.

There's plenty of other thread to pull on in the *Times*'s Christmas Eve piece, including a little-known company called Tricadia that created particularly toxic CDO's to allow clients to bet against them, and whose vice chairman up until a month ago was a senior adviser to Treasury Secretary Tim Geithner. ABC News from them:

White House visitor logs show Sachs was a regular in the West Wing, holding dozens of meetings with White House economic adviser Lawrence Summers, Chief of Staff Rahm Emanuel, and with staff for the National Economic Council. The logs show he had at least five meetings with President Obama in the Oval Office last year, and had participated in the president's daily economic briefing.

And this is hardly the only chicanery surrounding Abacus. Bloomberg's Jody Shenn wrote an important story on Abacus in November that reported Goldman was using its "sole discretion" to pay junior tranches of the CDOs before senior ones—the opposite of what's supposed to happen.

Goes to show you what good, tough journalism can do. Fraud charges have finally hit Wall Street, and *The New York Times* was instrumental in digging it out.

**EXHIBIT B – 38**  
**LARRY LITTON JR. LETTER TO THE EDITOR, FINANCIAL TIMES**

## **Put your Readers Straight about Litton**

Letter to the Editor, Financial Times by Larry B. Litton, Jr. , June 22, 2010

Financial Times - June 22, 2010 - By Larry B. Litton, Jr.  
© 2010 The Financial Times Limited. All rights reserved

Sir, Your articles about Litton Loan Servicing ("Subprime consumers hit at Goldman" and "US consumers rage against Goldman unit", June 16) distort the truth, omit key facts and create a misleading impression of the company.

**Importantly, neither mentioned that Litton has modified or granted trial modifications for more than 100,000 loans in the past two years. That is almost one-third of our total mortgage portfolio.**

Litton strives to ensure that our customers are treated with respect and receive a fair opportunity to restructure their payments to levels they can afford. Unfortunately, there are cases where we cannot help customers who do not have the financial capacity to maintain a mortgage, even with a modification. There are also occasions when customers request a loan modification even if they have the financial resources to be able to service their existing loan.

The stories mischaracterise Litton's modification performance. In an interview with the reporter, I explained that Litton is among a group of servicers that grant trial modifications relying on verbal income information from the customer, until recently a standard practice under the Home Affordable Modification Program. A second group of servicers grant modifications only after receiving customers' written income verification. Servicers in the first category, like Litton, have lower conversion rates to permanent modifications because of the frequency of inconsistencies between customers' verbal and written income representations. The articles failed to mention that Litton is among the top-performing servicers, in its group, in converting homeowners from trial modifications to permanent modifications.

The stories make no attempt to put Litton's activities in the context of the broader mortgage servicing industry. Your readers have been given a misleading and incomplete picture and, in the process, have been poorly served.

Larry B. Litton, Jr,  
President and Chief Executive,  
Litton Loan Servicing,  
Houston, TX, US

<http://www2.goldmansachs.com/our-firm/on-the-issues/viewpoint/viewpoint-articles/letter-litton.html>

EXHIBIT B – 39  
COMPLAINT AGAINST GOLDMAN SACHS & CO, HSBC SECURITIES (USA), ET AL  
ALSO MENTIONS FREMONT INVESTMENT AND LOAN

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT  
CIVIL ACTION NO.

CAMBRIDGE PLACE INVESTMENT  
MANAGEMENT INC.,

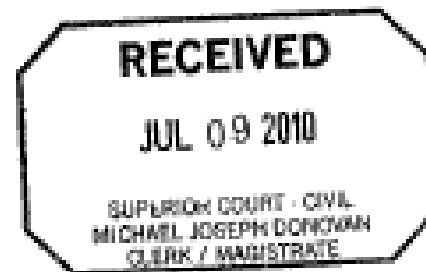
Plaintiff,

v.

MORGAN STANLEY & CO., INC.;  
CITIGROUP GLOBAL MARKETS INC.;  
CREDIT SUISSE SECURITIES (USA) LLC;  
RBS SECURITIES, INC.; DEUTSCHE  
BANK SECURITIES, INC.; MERRILL  
LYNCH, PIERCE, FENNER & SMITH,  
INC.; UBS SECURITIES LLC; GOLDMAN,  
SACHS & CO.; J.P. MORGAN SECURITIES  
INC.; COUNTRYWIDE SECURITIES  
CORPORATION; FBR CAPITAL  
MARKETS & CO.; HSBC SECURITIES  
(USA), INC.; BANC OF AMERICA  
SECURITIES LLC; RESIDENTIAL  
FUNDING SECURITIES, LLC; BARCLAYS  
CAPITAL INC.; ACCREDITED  
MORTGAGE LOAN REIT TRUST; ACE  
SECURITIES CORPORATION; AEGIS  
ASSET BACKED SECURITIES  
CORPORATION; ALLIANCE SECURITIES  
CORPORATION; AMERICAN HOME  
MORTGAGE ASSETS LLC; AMERIQUEST  
MORTGAGE SECURITIES INC.; ARGENT  
SECURITIES INC.; ASSET BACKED  
FUNDING CORPORATION; ASSET  
BACKED SECURITIES CORPORATION;  
BANC OF AMERICA MORTGAGE  
SECURITIES, INC.; BCAP LLC; BEAR  
STEARNS ASSET BACKED SECURITIES I  
LLC; CITIGROUP MORTGAGE LOAN  
TRUST INC.; CREDIT SUISSE FIRST

COMPLAINT and  
JURY DEMAND

10 2741



[CAPTION CONTINUED  
ON NEXT PAGE]



**EXHIBIT B – 39 cont’d.**  
**COMPLAINT AGAINST GOLDMAN SACHS & CO, HSBC SECURITIES (USA), ET AL**

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EXHIBIT B – 40

GOLDMAN SACHS' LITTON LOAN SERVICING SUSPENDS FORECLOSURES



**MFI-Miami**

Mortgage Fraud Investigations

WHAT WE DO

STEVE'S BLOG

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## Goldman Sachs' Litton Loan Servicing Suspends Foreclosures In Some States

By [Steve Olsari](#)

November 9, 2010

Maria Aspan and Maureen Bavdek, Reuters

Goldman Sachs Group Inc's mortgage servicing unit has suspended evictions and foreclosures in some states, according to a regulatory filing on Tuesday.

Goldman has been reviewing the practices of its Litton Loan Servicing unit after regulators and states attorneys general asked for information about its practices, as part of an industry-wide probe into banks' foreclosure practices, the firm said.

"Litton has temporarily suspended evictions and foreclosure and real estate owned sales in a number of states, including those with judicial foreclosure procedures," Goldman said in a filing with the U.S. Securities and Exchange Commission on Tuesday.

Goldman said it has not found evidence of any foreclosures that were unwarranted, and that it does not expect its foreclosure suspension "to lead to a material increase in its mortgage servicing-related advances."

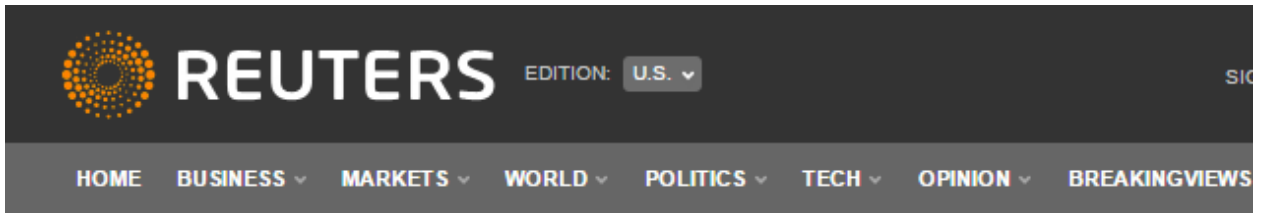
Goldman's shares were up less than 1 percent at \$170.44 in mid-morning trading on the New York Stock Exchange.

Filed Under: [Mortgage News](#)

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EXHIBIT B – 41

C-Bass (Credit-Based Asset Servicing and Securitization LLC) files bankruptcy



**GUARANTEED SBA LOANS**  
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# Subprime mortgage pioneer C-Bass files bankruptcy

BY JONATHAN STEMPEL  
NEW YORK | Fri Nov 12, 2010 6:53pm EST

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Mall operator General Growth exits bankruptcy

UPDATE 2-U.S. mall operator General Growth exits bankruptcy

(Reuters) - C-Bass, a pioneer in the packaging of subprime mortgages into securities that investors could buy, filed for Chapter 11 protection, three years after a restructuring was designed to keep it out of bankruptcy.

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## EXHIBIT B – 42 FINANCIAL FIRMS' ERRORS RECOGNIZED BY MANY

Dana Milbank, the Washington Post columnist, wrote about his own experience: a routine mortgage refinance with Citibank somehow turned into a nightmare of misquoted rates, improper interest charges, and frozen bank accounts.

washingtonpost.com > Opinions



**Dana Milbank**  
Op-Ed Columnist

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### Behind the foreclosure crisis, big banks' reign of error

By [Dana Milbank](#)  
Sunday, March 6, 2011

The problem in the nation's housing market now isn't subprime lending. It's subpar lenders.

Last fall, my wife and I refinanced our mortgage with Citibank. Sixty days later, we received a "cancellation notice" from our homeowners insurance company "for non-payment of premium."

Turns out Citibank, which had been collecting hundreds of dollars a month from us to pay the insurer, hadn't made the payments. It was, I later learned, one of the usual tricks mortgage servicers use to squeeze more cash out of their customers. About a month later, I learned of another trick: Citibank informed us that it was increasing our monthly payment by nearly \$300.

Along the way, a simple refi became a months-long odyssey: rates misquoted, interest charged on a phantom account, legal documents issued in wrong names, a mortgage officer who disappeared for days at a time (first it was his birthday, then his laptop was in the shop), a bounced check from Citibank's own title company, and the freezing of our bank accounts.

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The New York Times

## Another Inside Job By [PAUL KRUGMAN](#) Published: March 13, 2011

The New York Times

### The Opinion Pages

OP-ED COLUMNIST

#### Another Inside Job

By [PAUL KRUGMAN](#)  
Published March 13, 2011

Count me among those who were glad to see the documentary "Inside Job" win an Oscar. The film reminded us that the financial crisis of 2008, whose aftereffects are still blighting the lives of millions of Americans, didn't just happen — it was made possible by bad behavior on the part of bankers, regulators and, yes, economists.



What the film didn't point out, however, is that the crisis has spawned a whole new set of abuses, many of them illegal as well as immoral. And leading political figures are, at long last, showing some outrage. Unfortunately, this outrage is directed, not at banking abuses, but at those trying to hold banks accountable for these abuses.

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EXHIBIT B – 43  
GOLDMAN SACHS SELLS LITTON LOAN SERVICING TO OCWEN

**BloombergBusinessweek**  
Magazine



Global Economics Companies & Industries Politics & Policy Technology Markets & Finance Innovation & Design Lifestyle

CHOOSING EGYPT IS SMART,  
CHOOSING CIB IS GENIUS

Mortgages

## Goldman Closes the Door on Subprime

By Christine Harper and Karen Weise | June 09, 2011



When Goldman Sachs ([GS](#)) bought Litton Loan Servicing, a firm that collects mortgage payments from homeowners, in 2007 for an unannounced price, it seemed like a simple way to get an on-the-ground view of the subprime market. The insight would help Goldman Sachs figure out how much to pay for loans, and Litton would work with borrowers to get them back on track. Other sophisticated investors, including billionaire Wilbur L. Ross and private equity firm Centerbridge Capital Partners, bought mortgage servicers with a similar strategy in mind.

It didn't work out as planned. While there were plenty of distressed mortgages and lots of eager buyers, the loan holders had little incentive to mark down prices because that would mean taking a big loss on their books. "The distressed-asset market never got as hot as people were hoping it would," says Dean H. DeMeritte, an executive vice-president at Phoenix Capital, a Denver brokerage for mortgage servicing contracts.

On June 6, Goldman Sachs agreed to sell Litton to another mortgage servicer, Ocwen Financial ([OCN](#)), for \$263.7 million. The sale comes two months after Goldman Sachs wrote down the value of the business by about \$200 million. "It

**EXHIBIT B – 43 cont'd.**

**GOLDMAN SACHS SELLS LITTON LOAN SERVICING TO OCWEN**

On June 6, Goldman Sachs agreed to sell Litton to another mortgage servicer, Ocwen Financial (OCN), for \$263.7 million. The sale comes two months after Goldman Sachs wrote down the value of the business by about \$200 million. "It really makes sense for them to sell it," says David B. Hilder, an analyst at Susquehanna Financial Group. "They bought it at a time when the business was easier, and it looked like there might be some insights to be gained in the mortgage market from having a servicer." Neither Goldman Sachs nor Litton would comment.

**STORY: S&P's Settlement With the SEC Isn't the End of Its Problems**

Founded in 1988 by Larry B. Litton Sr. in Houston, Litton was one of the first mortgage servicers to specialize in working with troubled loans, sometimes called "scratch and dent" servicing. It developed that skill during the savings and loan crisis, when it was hired by Resolution Trust Corp. to handle mortgages that were orphaned by failed banks.

Larry Litton Jr., who now runs the company, is known in the industry for his Texas drawl, straight talk, and vocal support for working with struggling borrowers before they get too far behind. Bruce A. Gottschall, the founder of Neighborhood Housing Services of Chicago, a nonprofit that worked with Litton a decade ago, says the company "seemed to me a little bit more flexible in terms of modifications early on." Litton Jr. currently is a member of the Federal Reserve's Consumer Advisory Council, where he has been vocal about foreclosure prevention. Ocwen would not comment on whether he will stay with the company after the sale.

Litton's business grew with the subprime market. In 1995 it serviced \$1.2 billion in loans, according to Fitch Ratings. By 2007 its portfolio had ballooned to almost \$54 billion; it's about \$41.2 billion today. As the boom gave way to the bust, Litton was forced to hire more staff to deal with rising defaults. The company became the target of class actions alleging excessive fees and violations of consumer-protection laws as well as investigations by state and federal regulators. It has agreed to settle at least one of the lawsuits while denying liability; others are pending. It says it is cooperating with government investigations. Goldman Sachs will remain liable for

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**EXHIBIT B – 43 cont'd.**  
**GOLDMAN SACHS SELLS LITTON LOAN SERVICING TO OCWEN**

Litton's business grew with the subprime market. In 1995 it serviced \$1.2 billion in loans, according to Fitch Ratings. By 2007 its portfolio had ballooned to almost \$54 billion; it's about \$41.2 billion today. As the boom gave way to the bust, Litton was forced to hire more staff to deal with rising defaults. The company became the target of class actions alleging excessive fees and violations of consumer-protection laws as well as investigations by state and federal regulators. It has agreed to settle at least one of the lawsuits while denying liability; others are pending. It says it is cooperating with government investigations. Goldman Sachs will remain liable for fines and penalties that could be imposed by government authorities relating to Litton's foreclosure and servicing practices before the deal closes.

**STORY: The Supreme Court Seems Poised to Curb Bias Lawsuits—Again**

With the Litton sale, Goldman Sachs will no longer deal directly with homeowners. Gottschall says Goldman's unloading the mortgage servicer is part of a bigger trend: "Wall Street is probably trying to distance themselves from the problems they caused."

*The bottom line: By selling Litton Loan Servicing, Goldman Sachs is out of the messy business of working with distressed homeowners.*

EXHIBIT B – 44  
FEDERAL RESERVE TAKES ACTION AGAINST GOLDMAN SACHS

Press Release

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FEDERAL RESERVE press release



*Release Date: September 1, 2011*

**For immediate release**

The Federal Reserve Board on Thursday announced a formal enforcement action against the Goldman Sachs Group, Inc. and Goldman Sachs Bank USA to address a pattern of misconduct and negligence relating to deficient practices in residential mortgage loan servicing and foreclosure processing involving its former subsidiary, Litton Loan Servicing LP.

Goldman Sachs sold Litton to Ocwen Financial Corporation on September 1, 2011 and has ceased to conduct residential mortgage servicing. Litton is the 23rd largest mortgage servicer in the United States.

The action orders Goldman Sachs to retain an independent consultant to review foreclosure proceedings initiated by Litton that were pending at any time in 2009 or 2010. The review is intended to provide remediation to borrowers who suffered financial injury as a result of wrongful foreclosures or other deficiencies identified in a review of the foreclosure process. The foreclosure review will be conducted consistent with the reviews currently underway at the 14 large mortgage servicers that consented to enforcement actions brought by the banking agencies on April 13, 2011.

If Goldman Sachs re-enters the mortgage servicing business while the action is in effect, it will be required to implement enhanced corporate governance, risk-management, compliance, borrower communication, servicing and foreclosure practices comparable to what the 14 mortgage servicers are implementing.

As noted in the April press release, the Federal Reserve believes monetary sanctions are appropriate and plans to announce monetary penalties. These monetary penalties against Goldman Sachs will be in addition to the corrective actions that Goldman Sachs will be taking pursuant to today's action. Goldman Sachs has acknowledged in today's action that it will be responsible for satisfying any civil money penalty that the Board of Governors could have assessed against Litton for its conduct.

For media inquiries, call 202-452-2955.

EXHIBIT B – 45

GOLDMAN SACHS PLAYING BOTH SIDES OF BANK OF AMERICA SETTLEMENT

To View Article Visit <http://onforb.es/ntFCoW>



**Nathan Vardi**  
Forbes Staff

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# Goldman Sachs Is Playing Both Sides Of The \$8.5 Billion Bank Of America Settlement

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When Bank of America CEO Brian Moynihan announced in late June that he had reached an \$8.5 billion settlement over representation and warranty claims on mortgage securities issued by Countrywide



Goldman Sachs CEO Lloyd Blankfein

**EXHIBIT B – 46**  
**HSBC LAYS OFF TENS OF THOUSANDS**  
**AFTER BEEFING UP BALANCE SHEET WITH US MORTGAGES**

Since I contacted the NJ Attorney General's office, I have learned that HSBC "acts as a trustee for certain loan securitization trusts in connection with the issuance of mortgage backed securities" (see Discovery Ex29: [PROOF](#)). I cannot confirm how HSBC's actions contributed to Litton's deception, however, trustees have been considered culpable in the mortgage crisis (see [Caught in the Cross-fire: Securitization Trustees and Litigation During the Subprime Crisis](#) or [download](#)). It has been [determined that trusts are not exempt from state laws](#). It's interesting that HSBC is forging onward with [reducing its presence in the US and UK and moving its headquarters to Hong Kong](#) (see article below: HSBC to Trim 30,000 jobs).

Goldman Sachs is the parent company of Litton Loan, reported by many as having purchased it to realize substantial financial gains from foreclosing on properties of mortgage holders (see [Goldman Sachs to Cash in Big Time With the Litton Loan Servicing Purchase](#)). You may have noticed that Goldman is dumping Litton Loan (see [Bloomberg article: Goldman Sachs Will Sell Litton Loan](#)). I have amended my complaint to include Goldman Sachs as a defendant along with Litton Loan Servicing ([download](#)).

**HSBC to Trim 30,000 Jobs in Cost-Cutting Move** By [JULIA WERDIGIER](#) AUGUST 1, 2011 5:21 AM

**The New York Times**

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## **HSBC to Trim 30,000 Jobs in Cost-Cutting Move**

By [Julia Werdigier](#)

August 1, 2011 5:21 am

**3:55 p.m. | Updated**

LONDON — HSBC, the big European bank, said Monday that it was cutting 30,000 jobs, as part of a wide-ranging cost-cutting program to improve profitability.

The large-scale cuts, which would represent about 10 percent of HSBC's work force, are part of the company's strategy to reduce expenses by \$2.5 billion to \$3.5 billion over the next two years. The layoffs include 5,000 positions the bank has already started to eliminate this year by closing some businesses.

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EXHIBIT B – 46 cont'd.  
HSBC LAYS OFF TENS OF THOUSANDS  
AFTER BEEFING UP BALANCE SHEET WITH US MORTGAGES

Survivor's guilt: Managing 30,000 layoffs at HSBC by [Shelley DuBois](#) AUGUST 2, 2011, 6:26 PM EST

# Survivor's guilt: Managing 30,000 layoffs at HSBC

by Shelley DuBois AUGUST 2, 2011, 6:26 PM EST



Europe's biggest bank will lay off 10% of its workforce over the next 10 years. While that certainly cuts costs, how do you keep the remaining employees productive?

By [Shelley DuBois](#), writer-reporter

FORTUNE — If you're one of HSBC's shareholders, you're probably stoked. For the first time in a couple of

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RECOMME



## HSBC Layoff & Severance Agreement Attorney - 14,000 employees to be laid off By [Villanueva & Sanchala](#) on May 17, 2013 1:02 PM

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### HSBC Layoff & Severance Agreement Attorney - 14,000 employees to be laid off

May 17, 2013

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Posted In: [Severance Packages, Severance Agreements, & Severance Negotiations](#)

By [Villanueva & Sanchala](#) on May 17, 2013 1:02 PM | [Permalink](#)



Our New York Severance Pay Lawyers have counseled many employees of HSBC, who were laid off, had their positions eliminated or were otherwise disciplined. Recently, HSBC announced that it intends to eliminate 14,000 positions, which is equivalent to 5% of its worldwide workforce, within the next 3 years. HSBC has offices throughout NY State including corporate offices in Buffalo and at 452 Fifth Avenue, New York City. It is important for employees to understand their rights and options if their jobs are at risk.

[TO VIEW FULL ARTICLE CLICK HERE](#)

If you were selected for a reduction in force or otherwise terminated and offered a severance agreement, contact our HSBC employment lawyers to confidentially learn your rights and see if and how we can maximize the terms of your severance package. During these sluggish economic times where gaps of unemployment are common and it is often difficult to find new employment quickly, it is imperative that you maximize your severance package. We can help you during the difficult process of losing your job. We have counseled hundreds of employees who have been presented with a severance agreement. You should not sign the agreement without speaking with an experienced employment lawyer first - the agreement is written for your former employer's benefit, not necessarily yours.

EXHIBIT B – 47  
HSBC CULPABILITY RECOGNIZED BY FINANCIERS WORLDWIDE

# UPDATE 2-UK fund star Woodford dumps HSBC on banking fine inflation fears

[TO VIEW FULL ARTICLE CLICK HERE](#)

Mon Sep 1, 2014 4:21pm BST

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\* Says Libor, FX probes could expose HSBC

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**AstraZeneca PLC**  
AZN.L  
**4,743.00p**  
▼-18.50 ▼-0.39%  
01/30/2015

**BAE Systems PLC**  
BAES.L  
**507.50p**  
▼-8.50 ▼-1.65%  
01/30/2015

\* Fears a substantial fine could hamper dividend growth

\* Sells his fund's entire stake in HSBC (Adds detail on other sellers of HSBC, context)

By [Sudip Kar-Gupta](#), [Nishant Kumar](#) and [Simon Jessop](#)

LONDON, Sept 1 (Reuters) - Star British fund manager Neil Woodford sold his fund's stake in HSBC last month, citing concerns about the impact of potential fines from several industry-wide investigations on the banking group.

Banks in Europe and the United States have been fined for a variety of transgressions as regulators increase their scrutiny of

financial institutions.

## Financial Biz Review: Mortgage Lender SUBPOENAS, HSBC DUMPS Greek Stock Market

[Mark Lawson](#) [MORE ARTICLES](#) June 07, 2012

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### Financial Biz Review: Mortgage Lender SUBPOENAS, HSBC DUMPS Greek Stock Market

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June 07, 2012



Reactions

U.S. Bancorp ([NYSE:USB](#)), MetLife ([NYSE:MET](#)) and SunTrust ([NYSE:STI](#)) are among the mortgage lenders who have recently received subpoenas from Federal regulators, involving the now expanded inquiry into potential violations of [FHA](#) program rules. Banks found in violation could be penalized, with the proceeds going to help pay back FHA losses.

Don't Miss: [JPMorgan Takes an AXE to These Major Tech Players](#)

[HSBC Holdings](#) ([NYSE:HBC](#)) gets out of the Greek stock market, divesting its brokerage unit there, which holds \$44.7 million in assets, to a group of investors which is led by HBC's current managing director, Nikos Pantelakis.

EXHIBIT B – 48  
 HSBC BANK USA, N.A. SEC FILINGS



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 U.S. Securities and Exchange Commission

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**HSBC Bank USA, N.A. CIK#: 0001582152 (see all company filings)**

State location: VA | State of Inc.: VA | Fiscal Year End: 1231

Business Address: 1800 TYSONS BLVD, SUITE 90, MCLEAN VA 22102, 716 841-7497

Mailing Address: ATRIUM BUILDING, 95 WASHINGTON STREET, SIXTH FLOOR, BUFFALO NY 14203

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13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-14-000004 (34 Act) Size: 2 KB	2014-10-08	028-15552 141147498
13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-14-000003 (34 Act) Size: 2 KB	2014-07-28	028-15552 14895190
13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-14-000002 (34 Act) Size: 2 KB	2014-04-08	028-15552 14750346
13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-14-000001 (34 Act) Size: 2 KB	2014-01-08	028-15552 14515080
13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-13-000004 (34 Act) Size: 2 KB	2013-10-08	028-15552 131136992
13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-13-000003 (34 Act) Size: 2 KB	2013-07-23	028-15552 13980773
13F-NT	<a href="#">Documents</a>	Quarterly report filed by institutional managers, Notice Acc-no: 0001582152-13-000002 (34 Act) Size: 2 KB	2013-07-23	028-15552 13980762



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Form 13F-NT - Quarterly report filed by institutional managers, Notice SEC Accession No. 0001582152-13-000002

Filing Date: 2013-07-23 Period of Report: 2013-09-30

Accepted: 2013-07-23 11:59:25 Filing Date Changed: 2013-07-23

Documents: 1 Effectiveness Date: 2013-07-23

Document Format Files

Seq	Description	Document	Type	Size
1		primary_doc.html	13F-NT	
		primary_doc.xml	13F-NT	1873
	Complete submission text file	0001582152-13-000002.txt		2964

**HSBC Bank USA, N.A. (Filer) CIK: 0001582152 (see all company filings)**

IRS No.: 201177241 | State of Incorp.: VA | Fiscal Year End: 1231  
 Type: 13F-NT | Act: 34 | File No.: 028-15552 | Film No.: 13980762

Business Address: 1800 TYSONS BLVD, SUITE 90, MCLEAN VA 22102, 716 841-7497

Mailing Address: ATRIUM BUILDING, 95 WASHINGTON STREET, SIXTH FLOOR, BUFFALO NY 14203

## PLAINTIFF'S RESPONSE TO CHARACTER ASSASSINATION BY DEFENDANT'S ATTORNEY

February 1, 2014

TO: Denbeaux & Denbeaux Team  
 FROM: Veronica Williams  
 RE: Stern & Eisenberg's Effort to Destroy My Reputation

I was so angry and insulted after reading the first 2 paragraphs of the correspondence from David Lambropoulus to Judge Harriet Klein dated January 29, 2014 (attached), that I prepared this information as soon as I calmed down (a few days later). Yes, I know this is the *dance* and a common, underhanded legal strategy to undermine me. Let's turn it back on them. Of course, you should decide if and when to use this information.

I have always carried myself and taken great pride in having the upmost integrity. While I can cite numerous examples of being vetted and recognized for my character and integrity, let me highlight just a few:

ORGANIZATION & POSITION	DESCRIPTION	DATE
<a href="#">FINRA</a> Arbitrator	Successfully underwent extensive review, evaluation and investigation to become an arbitrator for the Financial Industry Regulatory Authority.	Since 2009
<a href="#">Women Who Mean Business</a>	Acclaimed panel and their supporting team scrutinized leading business women in the US and Canada. <a href="#">I was one of the 75 selected featured in this book.</a>	1999
Member of Microslate Board of Directors	I was the focus of an extensive and thorough investigation by this renown international manufacturing firm. I was the only foreigner, woman and minority voted in as a member of their Board of Directors. Our Board oversaw a major acquisition and also chaired the compensation committee.	1998 – 2003 est.
COMDEX Board of Advisors COMDEX Media Board	I was selected and <a href="#">provided advisory services to the largest commercial IT event company</a> for more than 5 years. A sitting US President attended the pavilion I created, orchestrated and led. This meant passing a Secret Service review. I also made several media appearances on their behalf.	1994-2002
US Public Trust	I held a US Public Trust (consulted to the National Archives) and passed two investigations by the US Dept. Homeland Security to attend confidential, private briefings. I also was cleared to review strategic information and deliver strategic and custom designed solutions for the US Army with admittance to multiple military bases. <b><i>I was in the final stage to receive a US Security Clearance until Goldman Sachs and Litton Loan defrauded me, an action condoned by HSBC in writing.</i></b>	2008
US Department of Defense (DoD)	Recommended by the DoD – OSD – I served as an early contributor to GIG development process as member of DoD Industry Council supported by NDIA/AFEI, DISA and major Federal contractors. With a reputation of high integrity, my company was the only small firm without a DoD task Order invited to attend.	2003 – 2008 est.



ORGANIZATION & POSITION	DESCRIPTION	DATE
Marquis Who's Who	<a href="#">Recognized since 1988 in over 38 publications.</a> Since Marquis Who's Who® is the premier publisher of biographical information used by thousands of public, academic and corporate libraries around the world. <a href="#">Marquis' Who's Who in America®</a> has remained the definitive biographical reference work since 1899, chronicling the lives and accomplishments of men and women in every field of endeavor. Marquis Who's Who LLC is a wholly owned subsidiary of News Communications, Inc, which also owns The Hill and National Register Publishing. For more information, please visit <a href="http://www.marquiswhoswho.com">www.marquiswhoswho.com</a>	1994 to current
<a href="#">PMI</a> PgMP credential holder	Successfully completed extensive and thorough evaluation and review to earn the <a href="#">PgMP credential</a> , held by less than 1,000 worldwide. <a href="#">Continues to comply with expertise and ethics standards to maintain credential.</a>	2009
Rotary International	I served as a two-term President of the Orange Rotary. Rotary International brings together a global network of volunteer leaders dedicated to tackling the world's most pressing humanitarian challenges. Rotary connects 1.2 million members of more than 34,000 Rotary clubs in over 200 countries and geographical areas. Their work improves lives at both the local and international levels, from helping families in need in their own communities to working toward a polio-free world. For more information, visit <a href="http://Rotary.org">Rotary.org</a> .	2004-06
Recommendations and Commendations	I have received countless recommendations over the years for my contributions and accomplishments. Many can be found online at <a href="http://www.VeronicaWilliams.com">www.VeronicaWilliams.com</a> , <a href="#">LinkedIn</a> and <a href="http://www.the5ps.com/Brand">http://www.the5ps.com/Brand</a> . Many written letters are available and two recent letters from fellow arbitrators are attached.	Lifetime

Additional validation available from extended resume (attached) and at [www.VeronicaWilliams.com](http://www.VeronicaWilliams.com).

EXHIBIT B – 49 cont'd.

Page 1 of 28 Total Pages

Rec'd 1/30/14



Stern & Eisenberg PC

Stern & Eisenberg, PC  
[www.sterneisenberg.com](http://www.sterneisenberg.com)

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Jacqueline F. McNally<sup>\*</sup>  
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M. Troy Freedman<sup>\*</sup>  
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Leslie J. Rase<sup>\*</sup>  
Christina C. Viola<sup>\*</sup>  
Oliver Ayon<sup>\*</sup>  
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Our file #117.7900

January 29, 2014

Via Lawyers Service

Hon. Harriet F. Klein, J.S.C.  
Essex County Superior Court  
Wilentz Justice Complex, 13<sup>th</sup> Floor  
212 Washington Street  
Newark, NJ 07102

RE: HSBC Bank USA, National Association, as Trustee vs. Veronica Williams, et. al.  
Docket F-839-13

Dear Judge Klein:

As the Court is aware, this firm serves as legal counsel to Plaintiff in the above captioned matter. Please accept this letter brief in lieu of a more formal memorandum of law in response to Defendant's opposition to Plaintiff's motion for Summary Judgment.

**EXHIBIT B – 49 cont'd.**

**Page 2 of 28 Total Pages**

Evidently Defendant believes that she can conjure a legitimate defense to this foreclosure action by burdening both the Court and opposing counsel with an endless legal brief.

Defendant's opposition is a transparent attempt to raise arguments which have now become convenient predicated on her inability to honor her loan obligations. It bears noting that Defendant has admitted *all* elements of Plaintiff's *prima facie* case in mortgage foreclosure. (See Defendant's Legal Brief in Support of Opposition, page 2). Despite the voluminous nature of her opposition, Defendant falls well short in converting her strained arguments into genuine issues of material fact which would warrant the denial of Plaintiff's application for Summary Judgment. As will be discussed in detail below, Plaintiff is a holder in due course with actual possession of the original "wet ink" note.

**Defendants' Suggestion that Plaintiff Lacks  
Standing Is Unsupported By the Competent Evidence Provided**

Plaintiff and Defendant agree that, in a foreclosure action, standing is established via possession of the original note *or* an assignment of mortgage which pre-dates the filing of the complaint. Deutsche Bank Trust Co. v. Angeles, 428 N.J. Super. 315 (App. Div. 2012). (See Defendants Legal Brief in Support of Opposition, page 4). In the matter *sub judice*, Plaintiff has both possession of the original note in addition to an assignment of mortgage which predates the complaint.

Plaintiff takes issue with Defendant's representation to the Court that "Plaintiff did not plead possession in their complaint, nor have they produced anything to date that is evidence of their physical possession of the original promissory note." Clearly, paragraph 16 of Plaintiff's complaint avers that Plaintiff is the holder of the note and entitled to commence foreclosure. Further, Plaintiff's interrogatory response # 28 (attached to Defendants opposition as Exhibit

EXHIBIT B – 50  
HSBC ADDS INSULT TO INJURY

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## Indices

Data delayed at least 15 min

S&P/TSX  
14,873.48 36.20 (0.25%)

Dow Jones  
17,164.95 -251.90 (-1.45%)

NASDAQ  
4,635.24 -48.17 (-1.03%)

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## HSBC HOLDINGS PLC

### Outrage after HSBC board member likens Hong Kong protesters to freed U.S. slaves: Why can't they 'wait for a while?'



Thousands have signed an online petition denouncing reported comments by an HSBC Holdings board member in which she likened Hong Kong protesters' demands for democracy to the emancipation of slaves

Communist-backed leader of Hong Kong says poor will become too powerful if protesters get their way

Hong Kong protesters blame 'triads' for stirring up violence after dozens injured in clashes with police

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### Communist-backed leader of Hong Kong says poor will become too powerful if protesters get their way

KEITH BRASSHER AND CHRIS BUCKLEY, THE NEW YORK TIMES | October 21, 2014 10:03 AM ET  
More from The New York Times



Protesters listen to a broadcast of long-awaited talks between student leaders and senior government officials. Philippe Lopez / AFP / Getty Images

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EXHIBIT B – 51  
OCWEN SETS ASIDE \$100M FOR FORECLOSURE SETTLEMENTS

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## Ocwen Sets Aside \$100M for Possible Foreclosure Settlement, Posts 3Q Loss

BY KATE BERRY  
OCT 30, 2014 2:57pm ET

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Under fire from New York's top banking regulator, Ocwen Financial took a \$100 million charge for a potential settlement for servicing violations and posted a third-quarter loss.

On an Oct. 30 conference call with analysts, William Erbey, Ocwen's executive chairman, said the \$100 million charge was the company's "best estimate of the exposure" for [backdating thousands of foreclosure letters to borrowers](#). Erbey deflected



"We need to deal with this, we need to deal with it effectively and do it quickly," said Bill Erbey, Ocwen's executive chairman, saying the charge could be "materially different" from an actual settlement.

### RELATED

[Ocwen Backdated Thousands of Foreclosure Notices, Lawsky Says](#)

[Lawsky's New Ocwen Fight Threatens Wells Fargo Servicing Sale](#)

[Cummings, Warren Request GAO Study on](#)

SOURCE: <http://www.nationalmortgagenews.com/news/servicing/ocwen-sets-aside-100m-for-possible-foreclosure-settlement-posts-3q-loss-1043018-1.html>

## EXHIBIT B – 52 CHRONOLOGY, COST & CONSEQUENCE OF “ERRORS”

Stop the theft of property from NJ and all US homeowners. While I cannot disprove the validity of the foreclosures, the information I present warrants further investigation before taking our homes.

The Hongkong and Shanghai Banking Corporation, a British owned bank now known as HSBC, is on course to take property owned by the Plaintiff with a NJ Foreclosure Case (**Docket F-00839-13**). There are likely more foreclosure cases underway in New Jersey and other states. Here’s one way this is being done: the mortgage servicers added invalid amounts to the principal of loans, sold off their portfolios at inflated prices, and then went out of business. This is a summary of my mortgage history (Ex3:[PROOF](#) & [PROOF](#)):

DATE	MORTGAGE PROVIDERS & SERVICERS	OUT OF BUSINESS	PROVIDER/ SERVICER	PRIMARY HELOC	BEGINNING PRINCIPAL BALANCE PER DEFENDANTS	CORRECT PRINCIPAL BALANCE	AMOUNT ADDED TO PRINCIPAL
8/25/1983	City Federal Savings & Loan	YES	P	P	\$75,536	\$75,536	\$0
	Main Street Mortgage	YES	S	P			\$0
	Chase Mortgage (HELOC)	DISMISSED	P	H			\$0
5/6/2002	Aames Home Loan	YES	P	P	\$69,980	\$69,980	\$0
	PCFS Mortgage	YES	S	P			\$0
2006	Litton Home Loan	YES	S	P	\$180,000	\$67,675	\$112,325
3/27/2006	Fremont Home Loan	YES	P	P	\$261,000	\$53,000	\$95,675
2009	Litton Home Loan	YES	S	P	NA	\$53,000	NA
2011	Ocwen	NO	S	P	NA	NA	NA
						TOTAL	\$208,000
	Litton Principal Payments, estimated					\$15,000	
	<b>As of Feb. 15, 2010</b>					<b>\$38,000</b>	
<p><b>All mortgages issued from the Fremont Home Loan Trust and serviced by Fremont Home Loan should be cancelled immediately. Consumers cannot trust the validity or accuracy of the figures for Fremont mortgages in MERS or any other files and systems.</b></p>							
<p>Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C</p>							

SOURCE: DISCOVERY (Ex3:[PROOF](#) & [PROOF](#))

Mortgage Servicing companies like Litton Loan, Fremont Home Loan and others, have repeatedly refused to give me a complete transaction history for my mortgage. Goldman Sachs, HSBC, Ocwen have fought “tooth and nail” to take my property that arguably carries a negative valuation (info available upon request). Their effort is not because they want to sell my property with full disclosure of the problems. It is likely because HSBC wants to escape fines while continuing to foreclose and take proceeds from homeowners out of the reach of the United States.

This motion should contain sufficient information to stop this atrocity.

**EXHIBIT B – 52 cont’d.**  
**CHRONOLOGY, COST & CONSEQUENCE OF “ERRORS”**

I am fighting to stop theft, not ownership of my home which is below water asset fraught with costly problems. The decline in value has been made public. I listed my house, at the height of the market, 3 times before Hurricanes Irene and Sandy and also before crime and abandoned properties skyrocketed in my neighborhood. Many, not all, of the damages were presented in HAMP applications (copies available of Ex41). I am in my 32<sup>nd</sup> year of living in and owning my home. I know South Orange and this neighborhood. There is a huge cost to owning this property *without a mortgage*, with little to no upside for at least 10 years.

To be sure, my primary objective is to stop theft of homes and the devaluation of a mainstay of the American dream that also empowers the economy – home ownership.

EXHIBIT C

DISCOVERY INFORMATION FOR DOCKET NO. ESSEX-L-004753-13

To Download Document with All Attachments [Click Here](#)

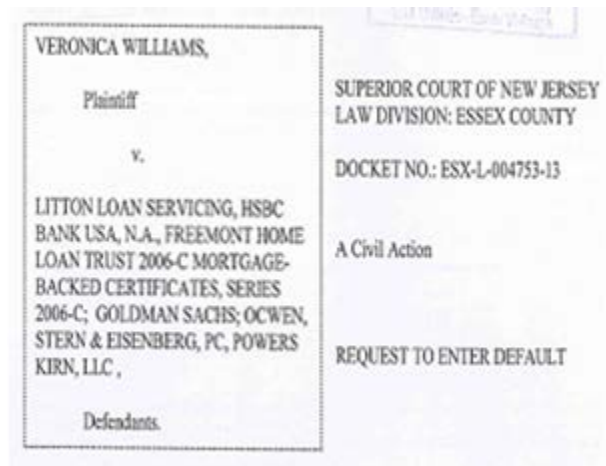
**INFORMATION ADDED TO NOV. 2014 DISCOVERY IS HIGHLIGHTED**

A CIVIL ACTION

Veronica Williams, Plaintiff

vs.

Litton Loan Servicing, HSBC Bank USA, N.A., Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates, Series 2006-C, Goldman Sachs, Ocwen, Superior Court of New Jersey \* Law Division: Essex County



**In response to a request from the attorney representing all defendants (Stuart I. Seiden of Duane Morris), I (the Plaintiff) have prepared this document that further clarifies and streamlines the "1500 pages" Mr. Seiden said my former attorney gave to him. I believe this includes a subset of that information, with explanations to help him better understand this matter. In response to Mr. Seiden's request, I assembled my proof in a timeline with further explanation, to help him understand what happened.**

**To help better understand this matter, Mr. Seiden's clients can help explain the financials, operational, regulatory and other pertinent information.**

**A summary of what happened, with links to proof, is presented in the following pages.**

**This document includes information not provided in the official discovery filing.**

**UPDATED 11/18/14**



## SERIAL ERRORS, FRAUD, or BOTH?

### SUMMARY

**This document explains how a series of actions by the defendants caused the financial ruin and near death of Veronica Williams. Links to documents, video and audio files corroborate the explanation. Additional information can be provided to those with a need to know.**

**The following outline provides a chronological summary of how:**

- A series of deceptive & fraudulent actions led to decimation of my income and health
- I have tried for 7 years to reverse the negative impact as the defendants dragged me through the mud and avoided taking responsibility for their actions
- Refusal to account for \$208,000 discrepancy in principal balance
- Am now trying to get my day in court, before a jury of my peers

**More than 40 years of time, money and effort went into preparing my firm – ACT Inc. – for the impending orders on our US GSA contract . The new orders required that I consolidate my operations. To achieve this, I decided to sell my home. After listing my home 3 times between 2005 and 2007 (Ex0: [PROOF](#)) without an offer over \$175,000, I decided to stay. My second option was to lower my cost of capital and operations costs by restructuring debt, a common practice. Several firms offered to refinance my mortgage, I chose Litton Loan.**

### CREATED DEBT RESTRUCTURE PLAN IN PREPARATION FOR IMPENDING ORDERS

**2008 approached mortgage firms to refinance. Narrowed my choice to Chase & Litton (had just bought my loan)**

- Chase offered 3% for both mortgages
- Had Several Conversations with Litton Loan
  - Told them of my concern: I refinanced in 2006 due to Litton Loan's bad reputation and recording payments late ([PROOF](#): &Ex1:[Pmt-2005](#) & Ex2:[Refinance](#))
  - Litton Loan added about \$112,325 & Fremont added about \$95,675 to my principal (Ex3:[PROOF](#) & [PROOF](#))
  - I refinanced with **Fremont Loan** to escape Litton Loan (for mortgage history see Ex2:[PROOF](#) )
  - I ended up back with Litton Loan, so why accept a modification and stay with Litton??
- Litton made compelling offer & said Goldman Sachs' ownership gave them new integrity
  - Litton told me they were now owned by Goldman Sachs and I did not have to worry
  - Litton assured me they would give me a modification if HAMP did not come through Ex4 [PROOF](#)
  - Even after "errors (returning my check, too many iterations of spreadsheet, countless phone calls) I was assured verbally & in writing that the modification would be confirmed upon receipt of my checks. (Ex5 [PROOF](#))
  - I was further assured that the modification would be approved by HAMP or Litton Loan and the attached document was sent in error
- Litton reduced my mortgage principal but not enough (Ex3:[PROOF](#) & [PROOF](#))
- In addition to the amount Litton Loan had added to my principal, Fremont added about \$95,675 to my principal (Ex3:[PROOF](#) & [PROOF](#))
- My intention was to accept the unjustified additions to principal, focus on the FEMA job and closing task orders against my firm's GSA contract, and use the modification to lower my costs of financing.
- Despite excessive addition to principal I decided to proceed, to focus time on ACT Inc. customers; heightened acquisition effort allowed ACT Inc. to achieve recognized and approved vendor status with multiple Federal Agencies. (Ex6: [PROOF](#)) Stepped up marketing and sales in 2005 (DoD working Group, IRA meetings, Proposals show DHS, DC, HUD – Ex7: [WITNESS](#))
- Sept. 2009 - Received job offer from FEMA to gain immediate "past performance"; contingent upon security clearance approval (Ex8: [PROOF](#))

## LAUNCHED DEBT RESTRUCTURE PLAN \* I PROCEEDED WITH PLAN

- Jan-Dec 2009 Litton Loan's representatives asked for extensive information and detailed analysis, *reassuring me along the way that my modification would be forthcoming*. Some of the documents submitted include, but are not limited to:
  - 2/25/09 to Julius Connor Ex9: [PROOF](#)
  - 3/28/09 to Brenda Moreno Ex10: [PROOF](#)
  - 8/2/09 to Loss Mitigation Dept. Ex11: [PROOF](#)
  - 9/28/09 to Loss Mitigation Dept. Ex12: [PROOF](#)
  - 12/28/09 to Bessie Cahee Ex13: [PROOF](#)
  - Jan-Nov Submitted several other requested analyses (*COPIES AVAILABLE UPON REQUEST*)
- I paid off uncollateralized debt (Ex14: [PROOF](#))  
I purchased money order and sent it with returned checks to Litton (Ex15:[PROOF](#), Ex16:[PROOF](#), Ex17:[PROOF](#))
- Continued with my "living mobile" trial/prep for FEMA job (Ex7: [WITNESSES](#))
- Cultivating business relationships and improved remote operations for ACT Inc. (Ex7: [WITNESSES](#))
- Completed E-Quip & responses for Federal Security Clearance on 12/12/2009 (Ex18:[PROOF](#) & Ex7: [WITNESSES](#))

## WHEN I WAS STUNNED WITH NOTICE OF FORECLOSURE JUST BEFORE HEARING

- Began drive from Ft. Lauderdale, FL to South Orange, NJ – alone (Ex7: [WITNESSES](#))
- Arrived in NJ about 4am the morning of the foreclosure hearing (Dec. 23, 2009)
- Too Exhausted to attend; Foreclosure was granted for Docket F- 28279-09 (Ex19: [PROOF](#))
- Was told it was an error and would be reversed if I sent an additional payment (Ex20:[PROOF](#))
- I completed all payments required for my modification (Ex15: [PROOF](#) )

## FORECLOSURE GRANTED AND MY SUFFERING BEGAN

- Dec. 2009 Litton Loan reneged on modification by foreclosing (Ex19:[PROOF](#))
- Dec. 2009 Litton said they could stop foreclosure if I documented what we discussed (Ex13: [PROOF](#) )
- Jan. 2010 Litton Loan's staff was unaware of the legal response by their attorney. With apology for Litton's errors and a promise of the immediate reversal of foreclosure and confirming the modification, I made more payments (Ex21: [PROOF](#) & Ex22: [Pmt-2010](#) & Ex15:[PROOF](#))
- Mar 2010 Lost Clearance (Ex23:[PROOF](#) & Ex7: [WITNESSES](#))
- 3/16/10 Lost GSA contract (Ex24:[PROOF](#) & Ex7: [WITNESSES](#))
- 5/12/10 Lost FEMA job (Ex23:[PROOF](#) & Ex7: [WITNESSES](#))
- By 2010 Lost strong credit ratings (D&B, Trans Union, Equifax, Experian)
- 2010→ Health declined (Ex25:[PROOF](#) & Ex7: [WITNESSES](#))
- 2010→ My company –AC T Inc. – now in jeopardy (Ex7: [WITNESSES](#))
- 2010→ Ability to find jobs decimated (Ex26: [PROOF](#) & Ex7: [WITNESSES](#))

## VW FOUGHT BACK

- DATE Tried to get Litton Loan, Goldman Sachs & HSBC to review my account & create a win-win solution (Ex27: [PROOF](#) & Ex28: [PROOF](#) Ex29: [PROOF](#) Ex30: [PROOF](#) Ex7: [WITNESSES](#))
- 2010 - 2011 Litton Loan and Goldman Sachs refused to discuss the matter (Ex31: [PROOF](#) & Ex7: [WITNESSES](#))
- DATE Appealed to NJ Banking Commission, SEC, Federal Reserve & others (Ex32: [PROOF](#) Ex33: [PROOF](#) & Ex7: [WITNESSES](#))
- Aug 2011 Filed legal complaint against Litton Loan & Goldman Sachs (Ex34:[PROOF](#))
- DATE Served Litton Loan & Goldman Sachs (Ex35: [PROOF](#) & Ex7: [WITNESSES](#))
- Sept. 1, 2011 Goldman Sachs sold Litton Loan to Ocwen (Ex36: [PROOF](#) & Ex37: [IN THE NEWS](#) or *COPY TO COURT ONLY* & Ex38: [SEC or SECprt](#) & Ex7: [WITNESSES](#))
- Sept. 1, 2011 Federal Reserve orders Goldman Sachs to conduct Foreclosure Review (Ex36: [PROOF](#))
- 2011 Litton Loan's attorney never responded to questions (Ex35: [PROOF](#))
- Sept. 16, 2011 Neither Litton Loan nor Goldman Sachs (did not) showed up at court hearing – VW granted motion (Ex35: [PROOF](#) & Ex7: [WITNESSES](#))

- Sept. 2011 Litton Loan-Goldman Sachs' attorney used court error to disqualify hearing so I withdrew and refiled (Ex35: [PROOF](#) & Ex7: [WITNESSES](#))
- Sept. 2011 Defendant's attorney obtained dismissal on a technicality. Judge said court could not make defendants wait until I recovered (Ex35: [PROOF](#))

## OCWEN-HSBC-GOLDAN SACHS SHOWED NO INTENTION OF DISCUSSING VIABLE SOLUTION – PLAINTIFF'S HEALTH WORSENERD

- Fall 2011 Ocwen started collection, ignored letters and refused to discuss any alternatives (Ex38: [PROOF](#) & Ex39: [PROOF](#) & [PROOF](#) & Ex7: [WITNESSES](#))
- 2011-2012 My health declined more (Ex25: [PROOF](#) & Ex7: [WITNESSES](#))
- March 2012 Foreclosure Dismissed *with intention of collecting money rather than resolving errors* (Ex40: [PROOF](#))
- 2011 – 2013 Goldman Sachs and HSBC ignored VW, backing Ocwen as they bullied me with collection (Ex35: [PROOF](#) & Ex38: [PROOF](#) & Ex7: [WITNESSES](#))
- Sept. 2012 Hospitalized for stress (Ex25: [PROOF](#) & Ex7: [WITNESSES](#))
- Oct. 2012 Hospitalized for stress (Ex25: [PROOF](#) & Ex7: [WITNESSES](#))
- Began praying and meditating throughout the day, every day
- Jan. 2013 Hospitalized for stress (Ex25: [PROOF](#) & Ex7: [WITNESSES](#))
- Feb. 2013 Gathered strength to prepare meals and drive (Ex7: [WITNESSES](#))

## VW CONTINUED TO FIGHT BACK

- March 2013 Resumed physical therapy after 4 months of life threatening health condition (Ex7: [WITNESSES](#))
- Spring 2013 VW searched for attorney with courage & knowledge to represent me (Ex7: [WITNESSES](#))
- April 2013 Tried to secure HAMP again, directly via HUD this time (Ex41: [PROOF](#))
- March 2013 → HAMP 1<sup>st</sup> – Lisa Ferri (Ex42: [PROOF](#)), 2<sup>nd</sup> Michael Martin (EX43: [PROOF](#)-audio only & [PROOF](#)), 3<sup>rd</sup> JasonBurak said my case is “out of scope” (emails removed by NovaDebt 10//14).
- 2011 – NOW Property continued to decline, FEMA denied repairs, insurance repair check sent to Litton (Ex44: [BEFORE](#) - [AFTER](#))
- April 24, 2013 VW retained Denbeaux & Denbeaux (Ex45: [PROOF](#) & Ex7: [WITNESSES](#)) Foreclosure Litigation
- June 2013 Filed new complaint against all defendants (Ex46: [PROOF](#))
- Next 12 months Lots of legal filings, hearings; HSBC started foreclosure proceedings again (Ex47: [PROOF](#)•[UPDATED](#))
- Feb. 2014 HSBC attorney says drop suit, pay up, move or else. Plaintiff said NO and dug in.
- Aug. 2014 Tried again to get HAMP offer (Ex41: [PROOF](#))
- Sept. 2014 IRS waived fees due to stress imposed health problems (Ex48: [PROOF](#))
- Sept. 2014 VW called Mediator to find out what happened in July hearing. Told of discussions that I consider a “professional reminder of Goldman Sachs’ & Duane Morris’ power” (Ex7: [WITNESS](#))
- Oct. 2, 2014 VW completed 4 hour deposition *with redundant questions* (cancelled physical therapy). Defendants’ attorney showed mortgage documents that were questionable (Ex49: [PROOF](#) & Ex7: [WITNESSES](#))
- Oct. 22, 2014 Defendants’ attorney promises to sue Denbeaux if they lose (Ex50: [PROOF](#) & [PROOF](#))
- Oct. 27, 2014 Denbeaux withdraws (Ex51: [PROOF](#) & Ex7: [WITNESSES](#))
- Oct. 23, 2014 Attorneys for Plaintiff and Defendants “confirm” trial date moved to Jan. 15, 2015 (Ex53: [PROOF](#))
- Oct. 27, 2014 VW launches fundraising campaign (Ex52: [PROOF](#) & Ex7: [WITNESSES](#))
- Oct. 28, 2014 VW begins search for new attorney
- Nov. 1, 2014 VW responds to Defendants’ letter via Seiden (Ex50: [PROOF](#) & [PROOF](#) & Ex7: [WITNESSES](#))
- Nov. 14, 2014 Learns that trial date HAS NOT been changed to Jan. 15, 2015
- Nov. 17, 2014 VW appeared before Judge Casper to :
  - Present Motion to Add Counts from Complaint L-00081-11
  - Grant jury trial that I always expected
  - Seek complete immunity for all new attorneys who will represent me
  - Receive sufficient time to retain and update new attorney

- Delay action on all Foreclosure actions until after the trial
- Present all legal actions associated with this matter (Ex47: **PROOF**)
- VW only presented her position and (Ex53: **PROOF**)
- Nov. 17, 2014 Hon. Dennis F. Carey, III Granted Veronica Williams Default Judgment in Case ESSEX-L-004753-13
- Retain Attorney
  - To Be Determined Schedule Proof Hearing, Reverse Foreclosure, Cancel Mortgage
  - To Be Determined Identify and complete any additional actions
  - To Be Determined If necessary, defend against appeal
- Next Step

**8 YEARS AFTER FREMONT MORTGAGE, 7 YEARS AFTER I REFINANCED WITH LITTON LOAN  
I FINALLY HAVE MY DAY IN COURT; HOPEFULLY NEXT HEARING WILL BE BEFORE A JURY OF MY PEERS**

**12/5/14 After I was granted a default judgment in court, the defendants' attorney and my former attorney appear to be pushing for a summary judgment without a trial. They are meeting with the latest judge assigned to my case today and I am not allowed to attend.**

**MOTIVE: ON NEED TO KNOW BASIS ONLY ♦ ADD WINDFALL SECTION TO MOTIVE DOCUMENT**

EXHIBIT D

**SBA Reconsideration of Loans Denied:**

**IRENE #4021 Business Loan Application: SBA Reference Number: # 1000115934**

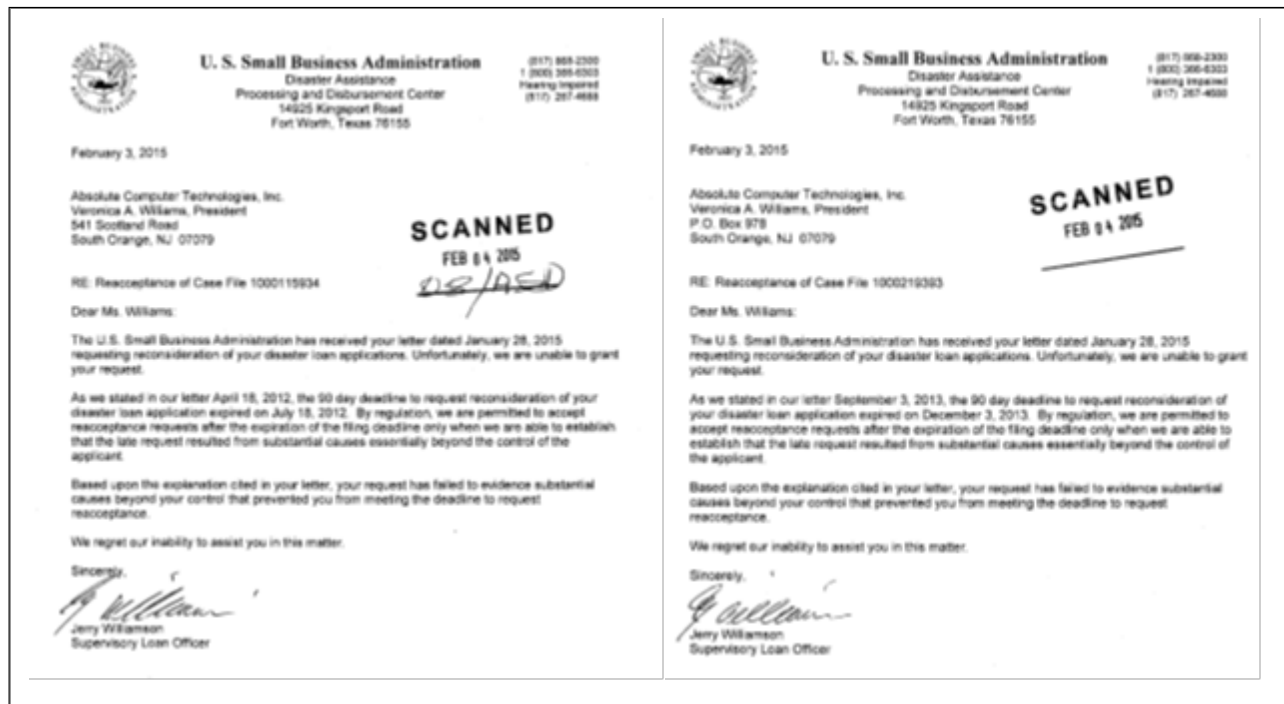
**SANDY #4086 Business Loan Application: SBA Reference Number: # 1000219393**

The Two Documents Submitted to the SBA can be downloaded by Clicking:

[SBA Loan Declined 9-3-13-Irene-Appeal-24pgs.doc](#)

[SBA Loan Declined 4-18-12-Sandy-Appeal-28pgs.doc](#)

The SBA responded that they are unable to grant the request in each of the two Documents below:



These documents can be downloaded by Clicking:

[http://finfix.org/proof/DD/SBA Loan Declined 2-3-15-Irene-Appeal-Response.pdf](http://finfix.org/proof/DD/SBA%20Loan%20Declined%202-3-15-Irene-Appeal-Response.pdf)

[http://finfix.org/proof/DD/SBA Loan Declined 2-3-15-Sandy-Appeal-Response.pdf](http://finfix.org/proof/DD/SBA%20Loan%20Declined%202-3-15-Sandy-Appeal-Response.pdf)



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January 27, 2015

SBA Reconsideration Department  
U. S. Small Business Administration  
Disaster Assistance  
Processing and Disbursement Center  
14925 Kingsport Rd  
Fort Worth, TX 76155

Re: IRENE #4021 Business Loan Application: SBA Reference Number: # 1000115934

Sent via email to [DisasterCustomerService@sba.gov](mailto:DisasterCustomerService@sba.gov)

Dear Ms. Meaney,

We are appealing the denial of our SBA loan application (Attachment I).

After realizing the magnitude of my health decline caused by these events, the IRS waived all fees Sept. 16, 2014 (Attachment II). The Superior Court of NJ awarded me a default judgment against Litton Loan, Goldman Sachs, HSBC, Ocwen et. al. on Nov. 17, 2014 upon hearing my position and viewing invalid documents from the attorneys. This document presents extensive evidence that refutes the reasons for denying our loan. I believe in standing up for truth and fairness, no matter who the opponent.

ACT Inc. has had multiple contracts just in the last two years that could have opened new revenue streams if we had adequate financing. My case with the Superior Court of New Jersey Essex Docket L-004753-13 shows how the defendants brought our firm's revenue to a grinding halt and imposed life threatening damage to my health. Reasons to approve our loan application are presented in Attachment III.

The Discovery document submitted to the court (Attachment IV) shows a systemic and systematic pattern of deception that caused the precipitous loss of revenue by ACT Inc. While there was a glimmer of hope in 2009, and again in 2012, the firms involved have moved aside the first six law firms they retained to defeat me (see Discovery Ex47: [PROOF](#)) and lined up behind Duane Morris LLP. to avoid taking responsibility for their actions.

The draft motion for a proof hearing shows why: honoring their agreement with me could set the stage for additional losses including their \$100B (estimate) mortgage portfolio to come tumbling down (Attachment V).

The summarized reasons supporting this request are presented in Attachments V, VI, VII, VIII and IX.

The following pages show the SBA's denial of our loan application and why the denial should be reversed. If you have any questions feel free to contact me by phone at 973-762-4100 or by email at .

Thank you,

Veronica Williams  
President

attachments

cc: S. Seiden, Duane Morris LLP with attachments I – V (13 pages)  
Appeals Section, IRS with attachments I – V (13 pages)  
Lloyd Blankfein, CEO, Goldman Sachs with attachments I – V (13 pages)  
Patrick J. Burke, President and Chief Executive Officer, HSBC with attachments I – V (13 pages)  
William Erby, Executive Chairman, Ocwen Financial Corporation with attachments I – V (13 pages)

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## ATTACHMENT I



### U.S. SMALL BUSINESS ADMINISTRATION

Disaster Assistance  
Processing and Disbursement Center  
14925 Kingsport Road  
Fort Worth, Texas 76155-2243

817-868-2300  
800-366-6303  
Hearing Impaired  
817-267-4688

April 18, 2012

Absolute Computer Technologies, Inc.  
Veronica Williams, President  
541 Scotland Road  
South Orange, NJ 07079

RE: SBA Disaster Loan Application No.: 1000115934

Dear Ms. Williams:

In response to your request for reconsideration of your previously declined disaster loan, we have thoroughly reviewed all of your new and previously provided information. Although we made every effort to approve your loan request, we are unable to offer you a disaster loan for the following reason(s):

#### **Unsatisfactory credit history**

As you are aware, your loan application was previously declined due to unsatisfactory credit history. Your letter indicated your credit issues were related to ongoing medical problems and a downturn in the economy. We have reviewed your Credit Bureau Report and all the accompanying documentation you have provided regarding the status of your credit and mortgage accounts. After a thorough review we conclude you have not provided sufficient information to overcome the decline for credit. Therefore, your loan remains declined.

#### **Lack of repayment ability**

Our analysis of your historic Federal Tax Returns, 2011 year to date profit and loss statement and all the information provided with your loan application we concluded your income is insufficient to repay a disaster loan in addition to your existing debts, living expenses, taxes, insurance, and other obligations.

#### **Not eligible due to Policy Reasons**

Absolute Computer Technologies, Inc is not in Good Standing with the New Jersey Department of Treasury, Division of Revenues. A legal entity which is not in Good Standing in the state in which it is organized and the state in which the disaster occurred is not eligible for disaster assistance.

If you disagree with our decision, you have the right to request reconsideration. Your request must:

1. Be in writing and be received by this office **within 90 days** from the date of this letter.
2. Contain significant new information that you believe will overcome the decline reason(s).
3. Provide a completed, signed and dated IRS Form 8821 (enclosed).





We Turn Technology  
... into Value

Absolute Computer Technologies, Inc.

ACT Request Reconsideration of Loan Application  
IRENE #4021 Business Loan Application:  
SBA Reference Number: # 1000115934  
Page 4 of 24

## ATTACHMENT I cont'd.

If you have any questions about this action, please contact our office at the above address or the toll free number.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dennis Willis'.

Dennis Willis  
Supervisory Loan Officer

Enc.

SBA Form 2157R(8-03)

The Federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided that the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Protection Act. The Federal agency that administers compliance with this law concerning this creditor is the Consumer Response Center, Federal Trade Commission, Washington, D.C. 20580.



We Turn Technology  
...into Value

Absolute Computer Technologies, Inc.

ACT Request Reconsideration of Loan Application  
IRENE #4021 Business Loan Application:  
SBA Reference Number: # 1000115934  
Page 5 of 24

## ATTACHMENT II

### Internal Revenue Service

PO Box 1190  
Ogden, UT 84402

Date: September 16, 2014

ABSOLUTE COMPUTER TECHNOLOGIES INC  
PO BOX 978  
SOUTH ORANGE NJ 07079-0978

### Department of the Treasury

#### Person to Contact:

Jerri L Gibson  
Employee ID  
Number: 1000142994  
Tel: 1-801-620-3360  
Fax: 1-855-857-5865  
Contact Hours: 8 am to 4 pm

#### In Re:

Penalty Appeals  
**Amount of Assessed Penalty(s):**  
\$2,730.00

#### I.R.C. Section(s):

6699 Failure to File Form 1120S

#### Tax Period(s) Ended:

12/2011 & 12/2012

Dear Ms. Williams:

I completed my review of your request to adjust the penalties assessed against you. Based on the information submitted, I am pleased to advise you the penalties will be abated (removed) in full. When this action has been completed, you will receive an adjustment notice from the Service Center, which originally assessed the penalty.

If you have any additional questions, please contact me at the telephone number listed above.

Sincerely,

  
Jerri L Gibson  
Appeals Tax Specialist

### **ATTACHMENT III**

## **Reasons to Approve Loan Application**

To be sure, I've had challenges in my life that many cannot imagine, much less handle. But I've met them head-on and have worked hard to prevail. So when I finally succeeded in positioning my firm to achieve a 40-year goal of closing task orders against a Federal Supply Schedule that took many years to earn, I will not sit back after losing it to deception. The reasons for denial are primarily attributable to problems that occurred as a result the deception by a few financial firms. The other reasons appear to be due to my decision to take legal action against these firms.

<b>IRENE #4021 Business Loan Application: SBA Reference Number: # 1000115934</b>	
<b>REASON FOR DENIAL</b>	<b>WHY DENIAL IS NOT JUSTIFIED</b>
<p><b>Unsatisfactory credit history</b>  As you are aware, your loan application was previously declined due to unsatisfactory credit history. Your letter indicated your credit issues were related to ongoing medical problems and a downturn in the economy. We have reviewed your Credit Bureau Report and all the accompanying documentation you have provided regarding the status of your credit and mortgage accounts. After a thorough review we conclude you have not provided sufficient information to overcome the decline for credit. Therefore, your loan remains declined.</p>	<p><b>I filed a legal complaint (Essex Docket L-004753-13) against the financial firms responsible for the decline in my credit. I was awarded a judgment by the Superior Court of New Jersey on Nov. 17, 2014. I am preparing a motion for the proof hearing to determine the amount of damages that I should receive. See Attachments IV and V.</b></p>
<p><b>Lack of repayment ability</b>  Our analysis of your historic Federal Tax Returns, 2011 year to date profit and loss statement and all the information provided with your loan application we concluded your income is insufficient to repay a disaster loan in addition to your existing debts, living expenses, taxes, insurance, and other obligations.</p>	<p>The contract that would have supported the loan was ended because we did not have the funds to cover the cash flow necessary to carry the contract. We will not accept a loan until and unless our contracts, and other sustainable profit, will allow us to make all payments.</p>
<p><b>Not eligible due to Policy Reasons</b>  Absolute Computer Technologies, Inc. is not in Good Standing with the New Jersey Department of Treasury, Division of Revenues. A legal entity which is not in Good Standing in the state in which it is organized and the state in which the disaster occurred is not eligible for disaster assistance.</p>	<p>Absolute Computer Technologies, Inc. was reinstated by the New Jersey Department of Treasury Jan. 23, 2013 (see Attachment VII). We should be in Good Standing with the New Jersey Department of Treasury, Division of Revenue.</p>

## ATTACHMENT IV

### Discovery Document Submitted to the Superior Court of New Jersey

(This attachment, Pages 12 – 16, provides links to documents; together they comprise the 750 page submission)

(To see the entire document filed with the court, [click here](#))

## DISCOVERY INFORMATION FOR DOCKET NO. ESSEX-L-004753-13

### A CIVIL ACTION

Veronica Williams, Plaintiff

vs.

Litton Loan Servicing, HSBC Bank USA, N.A., Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates, Series 2006-C, Goldman Sachs, Ocwen, Superior Court of New Jersey \* Law Division: Essex County

VERONICA WILLIAMS, Plaintiff  v.  LITTON LOAN SERVICING, HSBC BANK USA, N.A., FREEMONT HOME LOAN TRUST 2006-C MORTGAGE- BACKED CERTIFICATES, SERIES 2006-C; GOLDMAN SACHS; OCWEN, STERN & EISENBERG, PC, POWERS KIRN, LLC,  Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: ESSEX COUNTY  DOCKET NO.: ESX-L-004753-13  A Civil Action  REQUEST TO ENTER DEFAULT
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------

**In response to a request from the attorney representing all defendants (Stuart I. Seiden of Duane Morris), I (the Plaintiff) have prepared this document that further clarifies and streamlines the “1500 pages” Mr. Seiden said my former attorney gave to him. I believe this includes a subset of that information, with explanations to help him better understand this matter. In response to Mr. Seiden’s request, I assembled my proof in a timeline with further explanation, to help him understand what happened.**

**To help better understand this matter, Mr. Seiden’s clients can help explain the financials, operational, regulatory and other pertinent information.**

**A summary of what happened, with links to proof, is presented in the following pages.**

## **SERIAL ERRORS, FRAUD, or BOTH?**

### **SUMMARY**

**This document explains how a series of actions by the defendants caused the financial ruin and near death of Veronica Williams. Links to documents, video and audio files corroborate the explanation. Additional information can be provided to those with a need to know.**

**The following outline provides a chronological summary of how:**

- A series of deceptive & fraudulent actions led to decimation of my income and health
- I have tried for 7 years to reverse the negative impact as the defendants dragged me through the mud and avoided taking responsibility for their actions
- Refusal to account for \$208,000 discrepancy in principal balance
- Am now trying to get my day in court, before a jury of my peers

**More than 40 years of time, money and effort went into preparing my firm – ACT Inc. – for the impending orders on our US GSA contract. The new orders required that I consolidate my operations. To achieve this, I decided to sell my home. After listing my home 3 times between 2005 and 2007 ([PROOF](#)) without an offer over \$175,000, I decided to stay. My second option was to lower my cost of capital and operations costs by restructuring debt, a common practice. Several firms offered to refinance my mortgage, I chose Litton Loan.**

### **CREATED DEBT RESTRUCTURE PLAN IN PREPARATION FOR IMPENDING ORDERS**

**2008 approached mortgage firms to refinance. Narrowed my choice to Chase & Litton (had just bought my loan)**

- Chase offered 3% for both mortgages
- Had Several Conversations with Litton Loan
  - Told them of my concern: I refinanced in 2006 due to Litton Loan's bad reputation and recording payments late (**PROOF: &Ex1:Pmt-2005 & Ex2:Refinance**)
  - Litton Loan added about \$112,325 & Fremont added about \$95,675 to my principal (Ex3:**PROOF**)
  - I refinanced with **Fremont Loan** to escape Litton Loan (for mortgage history see Ex2:**PROOF** )
  - I ended up back with Litton Loan, so why accept a modification and stay with Litton??
  - Litton made compelling offer & said Goldman Sachs' ownership gave them new integrity
  - Litton told me they were now owned by Goldman Sachs and I did not have to worry
  - Litton assured me they would give me a modification if HAMP did not come through Ex4 **PROOF**
  - Even after "errors (returning my check, too many iterations of spreadsheet, countless phone calls) I was assured verbally & in writing that the modification would be confirmed upon receipt of my checks. (Ex5 **PROOF**)
  - I was further assured that the modification would be approved by HAMP or Litton Loan and the attached document was sent in error
- Litton reduced my mortgage principal but not enough (Ex3:**PROOF**)
- In addition to the amount Litton Loan had added to my principal, Fremont added about \$95,675 to my principal (Ex3:**PROOF**)
- My intention was to accept the unjustified additions to principal, focus on the FEMA job and closing task orders against my firm's GSA contract, and use the modification to lower my costs of financing.
- Despite excessive addition to principal I decided to proceed, to focus time on ACT Inc. customers; heightened acquisition effort allowed ACT Inc. to achieve recognized and approved vendor status with multiple Federal Agencies. (Ex6: **PROOF**) Stepped up marketing and sales in 2005 (DoD working Group, IRA meetings, Proposals show DHS, DC, HUD – Ex7: **WITNESS**)
- Sept. 2009 - Received job offer from FEMA to gain immediate "past performance"; contingent upon security clearance approval (Ex8: **PROOF**)

## **LAUNCHED DEBT RESTRUCTURE PLAN \* I PROCEEDED WITH PLAN**

- Jan-Dec 2009 Litton Loan's representatives asked for extensive information and detailed analysis, ***reassuring me along the way that my modification would be forthcoming.*** Some of the documents submitted include, but are not limited to:
  - 2/25/09 to Julius Connor Ex9: [PROOF](#)
  - 3/28/09 to Brenda Moreno Ex10: [PROOF](#)
  - 8/2/09 to Loss Mitigation Dept. Ex11: [PROOF](#)
  - 9/28/09 to Loss Mitigation Dept. Ex12: [PROOF](#)
  - 12/28/09 to Bessie Cahee Ex13: [PROOF](#)
  - Jan-Nov Submitted several other requested analyses (*COPIES AVAILABLE UPON REQUEST*)
- I paid off uncollateralized debt (Ex14: [PROOF](#))  
I purchased money order and sent it with returned checks to Litton (Ex15:[PROOF](#), Ex16:[PROOF](#), Ex17:[PROOF](#))
- Continued with my "living mobile" trial/prep for FEMA job (Ex7: [WITNESS](#))
- Cultivating business relationships and improved remote operations for ACT Inc. (Ex7: [WITNESS](#))
- Completed E-Quip & responses for Federal Security Clearance on 12/12/2009 (Ex18:[PROOF](#) & Ex7: [WITNESS](#))

## **WHEN I WAS STUNNED WITH NOTICE OF FORECLOSURE JUST BEFORE HEARING**

- Began drive from Ft. Lauderdale, FL to South Orange, NJ – alone (Ex7: [WITNESSES](#))
- Arrived in NJ about 4am the morning of the foreclosure hearing (Dec. 23, 2009)
- Too Exhausted to attend; Foreclosure was granted for Docket F- 28279-09 (Ex19: [PROOF](#))
- Was told it was an error and would be reversed if I sent an additional payment (Ex20:[PROOF](#))
- I completed all payments required for my modification (Ex15: [PROOF](#) )

## **FORECLOSURE GRANTED AND MY SUFFERING BEGAN**

- Dec. 2009 Litton Loan reneged on modification by foreclosing (Ex19:[PROOF](#))
- Dec. 2009 Litton said they could stop foreclosure if I documented what we discussed (Ex13: [PROOF](#) )
- Jan. 2010 Litton Loan's staff was unaware of the legal response by their attorney. With apology for Litton's errors and a promise of the immediate reversal of foreclosure and confirming the modification, I made more payments (Ex21: [PROOF](#) & Ex22: [Pmt-2010](#) & Ex15:[PROOF](#))
- Mar 2010 Lost Clearance (Ex23:[PROOF](#) & Ex7: [WITNESS](#))
- 3/16/10 Lost GSA contract (Ex24:[PROOF](#) & Ex7: [WITNESSES](#))
- 5/12/10 Lost FEMA job (Ex23:[PROOF](#) & Ex7: [WITNESSES](#))
- By 2010 Lost strong credit ratings (D&B, Trans Union, Equifax, Experian)
- 2010→ Health declined (Ex25:[PROOF](#) & Ex7: [WITNESSES](#))
- 2010→ My company –AC T Inc. – now in jeopardy (Ex7: [WITNESSES](#))
- 2010→ Ability to find jobs decimated (Ex26: [PROOF](#) & Ex7: [WITNESSES](#))



## VW FOUGHT BACK

- DATE Tried to get Litton Loan, Goldman Sachs & HSBC to review my account & create a win-win solution (Ex27: [PROOF &](#) Ex28: [PROOF](#) Ex29: [PROOF](#) Ex30: [PROOF](#) Ex7: [WITNESSES](#))
- 2010 - 2011 Litton Loan and Goldman Sachs refused to discuss the matter (Ex31: **PROOF &** Ex7: [WITNESSES](#))
- DATE Appealed to NJ Banking Commission, SEC, Federal Reserve & others (Ex32: [PROOF](#) Ex33: [PROOF &](#) Ex7: [WITNESSES](#))
- Aug 2011 Filed legal complaint against Litton Loan & Goldman Sachs (Ex34: [PROOF](#))
- DATE Served Litton Loan & Goldman Sachs (Ex35: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 1, 2011 Goldman Sachs sold Litton Loan to Ocwen (Ex36: [PROOF &](#) Ex37: [IN THE NEWS](#) or *COPY TO COURT ONLY* & Ex38: [SEC or SECprt](#) & Ex7: [WITNESSES](#))
- Sept. 1, 2011 Federal Reserve orders Goldman Sachs to conduct Foreclosure Review (Ex36: [PROOF](#))
- 2011 Litton Loan's attorney never responded to questions (Ex35: [PROOF](#))
- Sept. 16, 2011 Neither Litton Loan nor Goldman Sachs (did not) showed up at court hearing – VW granted motion (Ex35: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 2011 Litton Loan-Goldman Sach's attorney used court error to disqualify hearing so I withdrew and refiled (Ex35: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 2011 Defendant's attorney obtained dismissal on a technicality. Judge said court could not make defendants wait until I recovered (Ex35: [PROOF](#))

## OCWEN-HSBC-GOLDAN SACHS SHOWED NO INTENTION OF DISCUSSING VIABLE SOLUTION – PLAINTIFF'S HEALTH WORSENE

- Fall 2011 Ocwen started collection, ignored letters and refused to discuss any alternatives (Ex38: [PROOF &](#) Ex39: [PROOF & PROOF](#) & Ex7: [WITNESSES](#))
- 2011-2012 My health declined more (Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- March 2012 Foreclosure Dismissed *with intention of collecting money rather than resolving errors* (Ex40: [PROOF](#))
- 2011 – 2013 Goldman Sachs and HSBC ignored VW, backing Ocwen as they bullied me with collection (Ex35: [PROOF &](#) Ex38: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 2012 Hospitalized for stress (Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 2012 Hospitalized for stress ( Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- Began praying and meditating throughout the day, every day
- Jan. 2013 Hospitalized for stress (Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- Feb. 2013 Gathered strength to prepare meals and drive (Ex7: [WITNESSES](#))

## VW CONTINUED TO FIGHT BACK

- March 2013 Resumed physical therapy after 4 months of life threatening health condition (Ex7: [WITNESSES](#))
- Spring 2013 VW searched for attorney with courage & knowledge to represent me (Ex7: [WITNESSES](#))
- April 2013 Tried to secure HAMP again, directly via HUD this time (Ex41: [PROOF](#))
- March 2013 → HAMP 1<sup>st</sup> – Lisa Ferri (Ex42: [PROOF](#)), 2<sup>nd</sup> Michael Martin (EX43: [PROOF](#)-audio only & [PROOF](#)), 3<sup>rd</sup> JasonBurak said my case is “out of scope” (emails removed by NovaDebt 10//14).
- 2011 – NOW Property continued to decline, FEMA denied repairs, insurance repair check sent to Litton (Ex44: [BEFORE - AFTER](#))
- April 24, 2013 VW retained Denbeaux & Denbeaux (Ex45: [PROOF &](#) Ex7: [WITNESSES](#)) Foreclosure Litigation
- June 2013 Filed new complaint against all defendants (Ex46: [PROOF](#))
- Next 12 months Lots of legal filings, hearings; HSBC started foreclosure proceedings again (Ex47: [PROOF](#)♦[UPDATED](#))
- Feb. 2014 HSBC attorney says drop suit, pay up, move or else. Plaintiff said NO and dug in.
- Aug. 2014 Tried again to get HAMP offer (Ex41: [PROOF](#))
- Sept. 2014 IRS waived fees due to stress imposed health problems (Ex48: [PROOF](#))
- Sept. 2014 VW called Mediator to find out what happened in July hearing. Told of discussions that I consider a “professional reminder of Goldman Sachs’ & Duane Morris’ power” (Ex7: [WITNESS](#))
- Oct. 2, 2014 VW completed 4 hour deposition *with redundant questions* (cancelled physical therapy). Defendants’ attorney showed mortgage documents that were questionable (Ex49: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 22, 2014 Defendants’ attorney promises to sue Denbeaux if they lose (Ex50: [PROOF &](#) [PROOF](#))
- Oct. 27, 2014 Denbeaux withdraws (Ex51: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 23, 2014 Attorneys for Plaintiff and Defendants “confirm” trial date moved to Jan. 15, 2015 (Ex53: [PROOF](#))
- Oct. 27, 2014 VW launches fundraising campaign (Ex52: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 28, 2014 VW begins search for new attorney
- Nov. 1, 2014 VW responds to Defendants’ letter via Seiden (Ex50: [PROOF &](#) [PROOF &](#) Ex7: [WITNESSES](#))
- Nov. 14, 2014 Learns that trial date HAS NOT been changed to Jan. 15, 2015



**ATTACHMENT V**  
***Draft of Motion for Proof Hearing***

We request compensatory damages of \$ \_\_\_\_\_ M for the Plaintiff. Punitive damages should be determined by the court.

No amount of money can compensate for the near death incidents and trauma that the defendants put me through.

The defendants' actions inflicted severe injury in the Plaintiff warranting payment of the following damages:

<b>HURT TO PLAINTIFF</b>	<b>DAMAGES INCURRED</b>	<b>DAMAGES SOUGHT</b>
<b>COMPENSATORY</b>	<b>DOLLARS IN MILLIONS</b>	
• Loss of ACT Inc. contracts (\$279.2M)	\$279.2 M	TBD
• Loss of Employability in field of experience (\$1.8M [\$300K * 6 YRS- 2009-2015])	\$2.1M	TBD
• Stress Induced Severe Prolonged Illness	\$500.0 M	TBD
<b>PUNITIVE</b>	SEVERE	TBD

Much of the proof is provided in the [Discovery](#) document filed with the court. Several witnesses will attest to injuries and proof documents are included. Recent validation from the Federal government is attached to this document.

**LOSS OF ACT INC. CONTRACTS**

I invested 40 years, and in recent years, hundreds of thousands of dollars, to position ACT Inc. for lucrative, multi-year Federal task orders. ACT Inc. had been awarded Federal Supply Schedules, was positioned with multiple Federal agencies, and the Plaintiff was offered a FEMA job that would have given her a security clearance and the US Dept. Homeland Security past performance necessary to close task orders against ACT Inc.'s Federal Supply Schedule. The defendants' reneged on the modification, causing everything to be lost. Details are provided in the Discovery document.

**LOSS OF EMPLOYABILITY**

As a financial, operations and information technology professional, the Plaintiff's ability to secure jobs depends on clean credit and no legal actions. While her record earned the Plaintiff and her firm contracts from major companies over her 35+ year career, she has been denied hundreds of jobs since the defendants' actions.

**STRESS INDUCED SEVERE PROLONGED ILLNESS**

Defendants began deceptive actions in 2002. Their deception intensified in 2008. Despite convincing the Plaintiff that new ownership by Goldman Sachs had cleaned up their act, the deception of all defendants grew immensely. The Plaintiff did not realize the impact that the defendants' actions had on her health until her doctors began asking more probing questions. Soon it was clear that the Plaintiff's symptoms were directly correlated to and the direct result of, continued deception and depraved actions of the defendants. Between September 2012 and January 2013, she was hospitalized 3 times for stress induced illness. Her team of doctors ran every conceivable test to prove this.

**WHY HAVE DEFENDANTS SPENT MORE TO TAKE PLAINTIFF'S HOME THAN IT IS WORTH?**

- The deception and fraud is clearly documented
- Dramatic decline in property value known to FEMA, HUD, HAMP, Ocwen and other defendants
- Hurricane Irene, Sandy, and poor maintenance warrant repairs that will exceed \$120,000
- Defendants fought with 6 law firms (Ex47: [PROOF](#)), plus investigators, insurance firms and other since 2010

**BECAUSE.....**

- Plaintiff's case exposes "in and out" mortgage fraud
- 28.9% of US homeowners have been foreclosed upon (There have been [over 25 million foreclosures in the US since 2000.](#))
- New Jersey is #2 in foreclosures among US states
- HSBC is #2 bank in the world with assets of \$2.723Trillion
- Goldman Sachs is #28 bank in the world with assets of \$1.505Trillion
- \$263.7Million is what Ocwen paid Goldman Sachs for the Litton portfolio ([app 300K loans](#) ~ \$879 per loan?!)
- Value of mortgage portfolios involving HSBC likely to exceed \$100Billion [Forbes](#); HSBC sold only \$3.2Billion in 2013 [Bloomberg](#) & [NYTimes](#) & [HousingWire](#)
- HSBC left the US after underwriting Billions in mortgages and facilitating foreclosures
- There are foreclosures pending that will allow HSBC to take even more money out of the US

**ATTACHMENT V cont'd.**  
***Draft* of Motion for Proof Hearing**

**SUMMARY OF WHAT HAPPENED**

**The first defendant (Litton Loan) purchased my mortgage when my equity was about three times the amount of the principal balance of my mortgage. Due to their predatory reputation, I refinanced with the second defendant (Fremont) to get it out of the hands of Litton Loan. Fremont's mortgage had been underwritten by the third defendant (HSBC). A year later Fremont, the company that sold me the mortgage, went out of business and the first defendant (Litton Loan) acquired my mortgage again. During this time the fourth defendant (Goldman Sachs), a prominent US based financial firm, bought the first defendant (Litton Loan). So rather than move my mortgage to a financial firm who offered me a lower rate (Chase), I decided to accept the modification from the first defendant (Litton Loan) who was now owned by the fourth defendant (Goldman Sachs). A series of mistruths and deception by all defendants cost me everything I've worked for over the last 53 years, and almost took my life several times. To make matters worse, the defendants holding the mortgage have repeatedly failed to explain \$208,000 that has been added to the mortgage principal since this series of transactions began. The evidence supporting this statement is presented over and over in the Discovery document submitted to the Superior Court of New Jersey (download [click here](#)).**

***COMPLETE MOTION AVAILABLE UPON REQUEST***



We Turn Technology  
... into Value

Absolute Computer Technologies, Inc.

**ATTACHMENT VI**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

September 16, 2013

Capital One  
Office of Executive Resolution  
15000 Capital One Drive  
Richmond, VA 23238

Attn: Patricia Dumas

Subject: Effort to Remove Invalid Judgment against Veronica Williams and Settle  
Account No. 4121 7426 5028 0723

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Docket No.: DC-022806-09 (on file with the Superior Court of New Jersey)

Sent via facsimile to Fax 888-259-3021 total of 21 pages

Dear Trish:

I am writing to confirm our latest conversation. I will pay a final settlement of \$375 to Capital One. I can no longer pay \$620. Since our last conversation I have settled with another creditor, reducing the amount available from the final payment received from my firm's client.

Prior to sending the payment, however, we must receive written confirmation from Capital One and any of your affiliate firms or individuals for review by our advisors. Without a legally binding settlement letter, I will must include previous letters to Capital One (copies attached) in our applications for credit. The US Small Business Administration and Internal Revenue Service have been copied to demonstrate my good faith efforts to resolve this eight year old debt that was charged off April 28, 2007.

Trish, I appreciate your efforts that resulted in Capital One reversing their decision in the August 1, 2013 letter and allow you to intercede in an attempt to resolve this. You have made a stellar effort and it is now in the hands of Capital One senior management. The original attorney who handled this, and duplicitously initiated the judgment, worked for Arthur Nudelman of Nudelman, Nudelman and Zeiring (see attachments). You indicated the current attorney of record is Keith Golub of Nudelman Klemm & Golub PC. Again, based on past actions I no longer trust, nor am I willing to work with, any firm with which Arthur Nudelman is affiliated. I cannot afford an attorney to intervene. I hope that Capital One will step up, if necessary, and right this wrong.

I trust we can finally settle this account. Please send your response to me via facsimile at 888-

[Redacted]

[Redacted signature]

Veronica Williams

attachments

cc: Mr. Richard Fairbank, Founder, Chairman & CEO, Capital One via facsimile to [Redacted]  
Ms. Sancho c/o Danny Wertel, Principal Deputy Commissioner, IRS via email [Redacted]  
Mr. Kevin Payne, Supervisory Loan Officer, SBA Disaster Loan Assistance via email [Redacted]

RE: Disaster Loan Application No.: 1000219393





**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

**SUMMARY AND LIST OF ATTACHMENTS**

**EFFORTS TO SETTLE DEBT WITH CAPITAL ONE**

ACCOUNT NUMBER	COLLECTION REPRESENTATIVE	STATUS
4121 7426 5028 0723	Nudelman, Nudelman & Zeiring	<b>RENEGED ON 9/29/09 SETTLEMENT</b>
4121 7416 3523 0399		ACCOUNT NOT SETTLED
4791 2424 1607 2877	Northland Group	SETTLED 10/17/09
4155 5720 7673 4857	Capital One Recovery Cheterie Cunningham	SETTLED 10/8/09
4155 5720 7673 4857	Northland Group	SETTLED 12/4/09
4155 5720 7673 4857	Northland Group	SETTLED 12/10/09

**ATTACHMENTS**

**PRESENTED IN ORDER LISTED IN DOCUMENT**

ADDRESSED TO	FROM	DATE
Mr. Richard Fairbank Founder, Chairman, and Chief Executive Officer Capital One 15000 Capital One Drive Richmond, VA 23238	Veronica Williams	June 24, 2013
Veronica Williams, PO Box 978, South Orange, NJ	Capital One	August 1, 2013
Capital One and all other creditors	Veronica Williams	March 31, 2009
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	March 1, 2009
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	ACT Inc.	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	June 2, 2008
CapitalOne, P.O. Box 26074, Richmond, VA 23260	Veronica Williams	April 26, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	June 2, 2008
CapitalOne, P.O. Box 26074, Richmond, VA 23260	Veronica Williams	April 26, 2008



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**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

---

June 24, 2013

Mr. Richard Fairbank  
Founder, Chairman, and Chief Executive Officer  
Capital One  
15000 Capital One Drive  
Richmond, VA 23238

Subject: Remove Invalid Judgment from Veronica Williams' Credit Reports  
Account No. 4121 7426 5028 0723

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Your File No: NN50466  
Docket No.: DC-022606-09 (on file with the Superior Court of New Jersey)

Sent via facsimile to Fax 888-250-3021

Dear Mr. Fairbank:

The firm that represented Capital One engaged in deceptive practices and acted in bad faith. The result was substantial health and financial injury to me and my company. At the very least, Capital One should have the judgment vacated and the debt forgiven.

Please send written confirmation of the vacated judgment and zero balance on this account to me via facsimile at [REDACTED] or email to [REDACTED]

Thank you ✓

[REDACTED]  
Veronica Williams

attachments



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**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
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*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

June 24, 2013

<b>TransUnion</b> P.O. Box 6790 Fullerton, CA 92834 File# 193083666	<b>Experian</b> P.O. Box 9530 Allen, TX 75013 File# 0068602061	<b>Equifax</b> P.O. Box 740241 Atlanta, GA 30374 File# 8211057701
------------------------------------------------------------------------------	-------------------------------------------------------------------------	----------------------------------------------------------------------------

Subject: Remove Invalid Judgment from Veronica Williams' Credit Reports

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Your File No: NN50466  
Docket No.: DC-022606-09 (on file with the Superior Court of New Jersey)

Dear Sir/Madam:

The judgment by Capital One is not valid and should be removed from my credit reports immediately. I expect that Capital One will take immediate steps to have this judgment vacated.

I was never notified of the court action nor the date of this action. The greater injustice is that Arthur Nudelman repeatedly failed to confirm that they had legal jurisdiction over my debt. Negotiated a repayment plan in good faith and made all payments to Capital One (the legitimate holder of the debt). The repayment plan is provided in Attachment II.

DATE	PAYMENT
12/15/2009	\$145.00
11/26/2009	\$145.00
10/8/2009	\$ 50.00
PREVIOUS PAYMENTS	
7/24/2008	\$ 30.00
6/12/2008	\$ 30.00

Capital One has confirmed receipt of all payments (Attachment I).

I had several conversations with Greg Moore of Nudelman, Nudelman & Ziering and told him repeatedly I was sending the agreed upon payments to Capital One and would only make checks payable to Arthur Nudelman after they or Capital One provided me written confirmation that Arthur Nudelman or his firm was legally entitled to collect payments. They failed to do so and managed to get a judgment without notifying me.

As a result of their action of Arthur Nudelman and his firm, I suffered substantial financial losses and incredible stress. I was in the final stages of being reviewed for a security clearance for a Federal job and major task order against my Federal contract. The judgment was assessed one week before I was to be cleared. As a result of Arthur Nudelman and his firm's action, I lost the clearance, job, impending tasks orders and contract.

Please send copies of my corrected credit report to me via facsimile at 888-492-5864.

Thank you



Veronica Williams

attachments

cc: Richard Fairbank, Founder, Chairman, and Chief Executive Officer, Capital One  
Greg Moore, Nudelman, Klemm & Golub via email [g \[redacted\]](#)



**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ← South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ← South Orange, NJ 07079-3009

**ATTACHMENT I**

06/12/2013 THU 8:30 PM 8345881687 Capital One

06/12/2013



PO Box 3085  
Salt Lake City, UT 84104-0285

June 12, 2013

Veronica Williams  
PO Box 978  
South Orange NJ 07079

Re: 3000000000000000123  
case #: 10001910328950  
fax # 888-492-8664

Dear Veronica Williams:

Thank you for your recent inquiry.

This is to confirm the payments that posted to your account: \$145.00 on 12/15/2009, \$145.00 on 11/26/2009 and \$50.00 on 10/06/2009. There were no payments that posted to your account on 07/24/2009 and 08/12/2009. However, a \$30.00 payment posted on 07/24/2008 and a \$30.00 payment posted on 05/12/2008. If you need additional information please give us a call.

If you have any questions, or need any additional information, please give MCO a call at 800-268-1706.

Sincerely,

Capital One Service, LLC



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**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 + South Orange, NJ 07079-0978  
Residence - NO MAIL: 541 Scotland Road + South Orange, NJ 07079-3009

September 26, 2013

Mr. Richard Fairbank  
Founder, Chairman, and Chief Executive Officer  
Capital One  
15000 Capital One Drive  
Richmond, VA 23238

Subject: CONTINUED Effort to Remove Invalid Judgment against Veronica Williams and Settle  
Account No. 4121 7426 5028 0723

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Docket No.: DC-022606-09 (on file with the Superior Court of New Jersey)

Sent via facsimile to Fax 888-259-3021 total of 5 pages

Dear Mr. Fairbank:

I did not receive a response to the attached correspondence sent to the Capital One Office of Executive Resolution, so I am addressing this request to you.

Capital One should repair the damage to my credit caused by the duplicitous and egregious actions of its creditors and internal recovery department.

Capital One sent The Northland Group after me while Capital One's Internal Recovery Dept. pursued me to collect money for the same account - at the same time. I was so determined to do my best to honor and settle my debts that I did not realize I had paid and settled the same account with Northland and with Capital One until I prepared last week's letter. Capital One should pay Nudelman et. al. the money they want or intervene to do what is necessary to reverse the judgment and close my account with written notice to all collection agencies that this account has been "settled without an outstanding balance".

Here are snapshots of what I described:

EFFORTS TO SETTLE DEBT WITH CAPITAL ONE

ACCOUNT NUMBER	COLLECTION REPRESENTATIVE	STATUS
4121 7426 5028 0723	Nudelman, Nudelman & Zeiring	RENEGOTIATED ON 9/26/09 SETTLEMENT ACCOUNT NOT SETTLED
4781 2424 2607 2677	Northland Group	SETTLED 20/11/09
4155 5730 7673 4657	Capital One Recovery Cherise Cunningham	SETTLED 20/8/09
4155 5730 7673 4657	Northland Group	SETTLED 12/14/08
4155 5730 7673 4657	Northland Group	SETTLED 12/30/09

Copies of the letter that includes the chart above, and other documents, are available upon request.

I look forward to a final resolution to all Capital One accounts. Please send written confirmation via facsimile to 888-492-5864.

Thank you, 



attachments

cc: Capital One Office of Executive Resolution, Attn. Patricia Dumas via email





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**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence - NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

**ATTACHMENT I**



No. 7318 P. 2/3

Wednesday, December 02, 2009

Veronica Williams  
P.O. Box 978  
South Orange, NJ 07079

Re: Your account number: 415537207573-4857  
Customer number: 697281319  
Creditor: Capital One

Dear Veronica Williams

Thanks for your payment of \$407.86, which we received on 10/09/09. This payment settles your Capital One account, and we'll stop collection efforts on the remaining balance.

We'll notify the following credit reporting agencies that your account has been settled with an outstanding balance:

<b>Experian</b> P.O. Box 1385 Allen, TX 75013 1-888-397-3742 www.experian.com	<b>Equifax</b> P.O. Box 140296 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	<b>TransUnion Corporation</b> P.O. Box 2000 Cherry, PA 15022 1-800-888-4213 www.transunion.com	<b>Innovis</b> P.O. Box 1534 Columbus, OH 43216 1-800-540-2505 www.innovis.com
-------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------

The credit reporting agencies may take up to 30 days to update the information on your credit report. You can contact the agencies directly if you have questions. Please note that for your benefit, we may review your credit report to assure that this account has been updated properly.

If you have questions about your account, please give us a call at 1-800-258-0311. Our office hours are 8am to 8pm Eastern Time, Monday through Friday.

Thanks for paying your outstanding balance.



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**ATTACHMENT VII**  
**Absolute Computer Technologies, Inc.**  
**Certificate of Reinstatement**

Fax:

Jan 23 2013 02:27pm P002/002

STATE OF NEW JERSEY  
DEPARTMENT OF TREASURY  
CERTIFICATE OF REINSTATEMENT - ANNUAL REPORTS

ABSOLUTE COMPUTER TECHNOLOGIES, INC.  
0100305142

A DOMESTIC PROFIT CORPORATION

*WHEREAS the above-named business entity did on the 23rd day of January, 2013, satisfy all requirements for reinstatement as set forth in the laws of this State, I, the Treasurer of the State of New Jersey do hereby issue this certificate authorizing the same to continue its business and resume the exercise of its functions.*



IN TESTIMONY WHEREOF, I have  
hereunto set my hand and  
affixed my Official Seal  
at Trenton, this  
23rd day of January, 2013

Andrew P Sidamon-Eristoff  
State Treasurer

Certificate Number: 127204251

Verify this certificate online at

[https://www1.state.nj.us/TYTR\\_StandingCert/JSP/Verify\\_Cert.jsp](https://www1.state.nj.us/TYTR_StandingCert/JSP/Verify_Cert.jsp)



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Absolute Computer Technologies, Inc.

ACT Request Reconsideration of Loan Application

IRENE #4021 Business Loan Application:

SBA Reference Number: # 1000115934

Page 22 of 24

## ATTACHMENT VIII Notified Federal Authorities of Identity Fraud

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence - NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

---

May 22, 2012

Mr. Douglas Shulman  
Commissioner  
Internal Revenue Service  
1111 Constitution Ave., N.W.  
Washington, DC 20224

Mr. John Berry  
Director  
United States Office of Personnel Management  
1900 E Street, NW  
Washington, DC 20415

Subject: Identity Theft of Veronica Williams ✦ April 19, 2012 ✦ SSN 579-74-4037

Sent via email to John Berry, Dorothy Becones (for D. Shulman)

Dear Mr. Shulman & Mr. Berry,

I have just learned that I was the victim of identity theft and need your intervention to resolve the problem.

I have no doubt that my identity was recently stolen by one or more persons who had access to recent tax returns filed or Federal job applications. There has been little or no opportunity to access the information stolen through other means.

I have the knowledge and credentials to explain why and provide validation. **You must act right now.** This person or group has recently received or is waiting for stolen Federal funds. I also trust you will use my case to track and stop these and other identity thieves.

I will respond to a single person whom I can validate and is assigned to my case. I will release my social security number, IRS Form 14039 and other personal information required to that person. I can be reached by phone at 202-486-4565 or via email at [VWtemp@OfficeThatWorks.com](mailto:VWtemp@OfficeThatWorks.com). I shall await contact from your office.

Thank you in advance,

*Veronica Williams*

Veronica Williams

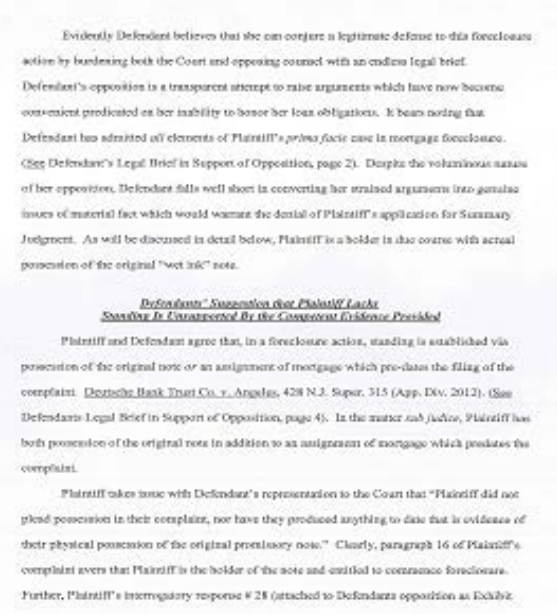
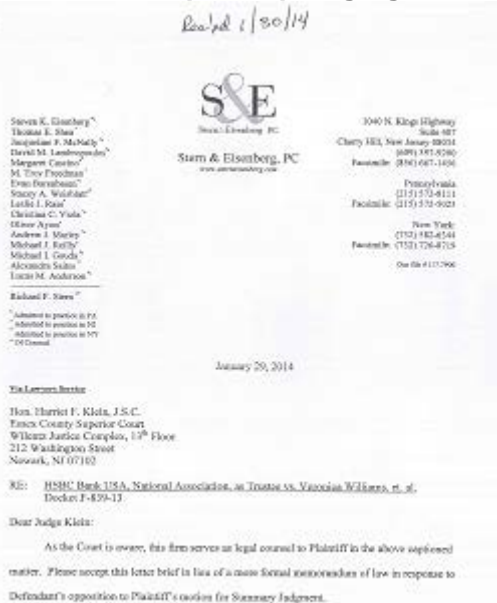
## ATTACHMENT IX

### Character Assassination is Dominant Strategy of Defendants' Attorneys Plaintiff's Is Of Strong Character and Has Been Vetted Extensively

Veronica A. Williams, Plaintiff and an upstanding member of the community, has been maligned and disrespected by Defendants' Attorneys. We have not yet completed our review of disparaging remarks against the Plaintiff. Many documents have been filed by at least 6 law firms since 2009. For a complete list of firms click here XXX. Recent documents that unfairly demean the Plaintiff include:

#### **Disrespected & Character Assassination by Defendants' Attorneys**

**While there was multiple disparaging correspondence, one of the most offensive & insulting is:**



1/29/14 CharacterAssasin\_Williams-Lambropoulos-PL Memo-inResp-to-Def-Opp-to-PL-MSJ.pdf [To View Full Doc Click Here](#)

#### **OTHER INSULTING CORRESPONDENCE**

10/30/13 CharacterAssasin\_To-O'Donnell-Response-to-Friv-Lit.pdf [To View Doc Click Here](#)

11/18/13 CharacterAssasin\_From-Lambropoulos-SE-Reply-in-Further-Supp-M-to-Dismiss.pdf [To View Doc Click Here](#)

12/11/13 CharacterAssasin\_PI-MSJ-w-out-Exhibits.pdf [To View Doc Click Here](#)

**Ironically, the defendants – financial firms– have retained legal counsel that do not display a sound understanding of finance.**

**Williams' commendations continue. Most recently, Williams has been recognized by:**

FINRA and The HL Carey Center at St. John University's Law School [click here](#)

The Financial Industry Regulatory Authority (FINRA) and The Hugh L. Carey Center for Dispute Resolution

Molson MBA International Case Competition [click here](#)

Marquis' Who's Who in the World [click here](#) & Who's Who in America [click here](#)

Williams:"I have always carried myself and taken great pride in having the upmost integrity. While I can cite numerous examples of being vetted and recognized for my character and honor, here are just a few":

ORGANIZATION & POSITION	DESCRIPTION	DATE
<a href="#">FINRA</a> Arbitrator	Successfully underwent extensive review, evaluation and investigation to become an arbitrator for the Financial Industry Regulatory Authority.	Since 2009
<a href="#">Women Who</a>	Acclaimed panel and their supporting team scrutinized leading business women	1999



ORGANIZATION & POSITION	DESCRIPTION	DATE
<a href="#">Mean Business</a>	in the US and Canada. <a href="#">I was one of the 75 selected &amp; featured in this book.</a>	
Member of Microslate Board of Directors	I was the focus of an extensive and thorough investigation by this renown international manufacturing firm. I was the only foreigner, woman and minority voted in as a member of their Board of Directors. Our Board oversaw a major acquisition and also chaired the compensation committee.	1998 – 2003 est.
COMDEX Board of Advisors COMDEX Media Board	I was selected and <a href="#">provided advisory services to the largest commercial IT event company</a> for more than 5 years. A sitting US President attended the pavilion I created, orchestrated and led. This meant passing a Secret Service review. I also made several media appearances on their behalf.	1994-2002
US Public Trust	I held a US Public Trust (consulted to the National Archives) and passed two investigations by the US Dept. Homeland Security to attend confidential, private briefings. I also was cleared to review strategic information and deliver strategic and custom designed solutions for the US Army with admittance to multiple military bases. <b><i>I was in the final stage to receive a US Security Clearance until Goldman Sachs and Litton Loan defrauded me, an action condoned by HSBC in writing.</i></b>	2008
US Department of Defense (DoD)	Recommended by the DoD – OSD – I served as an early contributor to GIG development process as member of DoD Industry Council supported by NDIA/AFEI, DISA and major Federal contractors. With a reputation of high integrity, my company was the only small firm without a DoD task Order invited to attend.	2003 – 2008 est.
Marquis Who's Who	<a href="#">Recognized since 1988 in over 38 publications.</a> Since Marquis Who's Who® is the premier publisher of biographical information used by thousands of public, academic and corporate libraries around the world. <a href="#">Marquis' Who's Who in America®</a> has remained the definitive biographical reference work since 1899, chronicling the lives and accomplishments of men and women in every field of endeavor. Marquis Who's Who LLC is a wholly owned subsidiary of News Communications, Inc, which also owns The Hill and National Register Publishing. For more information, please visit <a href="http://www.marquiswhoswho.com">www.marquiswhoswho.com</a>	1994 to current
<a href="#">PMI</a> PgMP credential holder	Successfully completed extensive and thorough evaluation and review to earn the <a href="#">PgMP credential</a> , held by less than 1,000 worldwide. <a href="#">Continues to comply with expertise and ethics standards to maintain credential.</a>	2009
Rotary International	I served as a two-term President of the Orange Rotary. Rotary International brings together a global network of volunteer leaders dedicated to tackling the world's most pressing humanitarian challenges. Rotary connects 1.2 million members of more than 34,000 Rotary clubs in over 200 countries and geographical areas. Their work improves lives at both the local and international levels, from helping families in need in their own communities to working toward a polio-free world. For more information, visit <a href="http://Rotary.org">Rotary.org</a> .	2004-06
Recommendations and Commendations	I have received countless recommendations over the years for my contributions and accomplishments. Many can be found online at <a href="http://www.VeronicaWilliams.com">www.VeronicaWilliams.com</a> , <a href="#">LinkedIn</a> and <a href="http://www.the5ps.com/Brand">http://www.the5ps.com/Brand</a> . Many written letters are available including letters from fellow arbitrators.	Lifetime

Additional validation may be found at [www.VeronicaWilliams.com](http://www.VeronicaWilliams.com).



We Turn Technology  
... into Value

Absolute Computer Technologies, Inc.

**Management Consulting ♦ Technology Services ♦ Advisory**

ACT, Inc., South Orange, NJ and Washington, DC

MAILING ADDRESS: P.O. Box 978, South Orange, New Jersey 07079-0978

Phone 973-762-4100 & 202-486-0700 ♦ Fax 888-492-5864 ♦ www.ACT-IT.com

January 27, 2015

SBA Reconsideration Department  
U. S. Small Business Administration  
Disaster Assistance  
Processing and Disbursement Center  
14925 Kingsport Rd  
Fort Worth, TX 76155

Re: SANDY #4086 Business Loan Application: SBA Reference Number: # 1000219393

Sent via email to [DisasterCustomerService@sba.gov](mailto:DisasterCustomerService@sba.gov)

Dear Ms. Meaney,

We are appealing the denial of our SBA loan application (Attachment I).

After realizing the magnitude of my health decline caused by these events, the IRS waived all fees Sept. 16, 2014 (Attachment II). The Superior Court of NJ awarded me a default judgment against Litton Loan, Goldman Sachs, HSBC, Ocwen et. al. on Nov. 17, 2014 upon hearing my position and viewing invalid documents from the attorneys. This document presents extensive evidence that refutes the reasons for denying our loan. I believe in standing up for truth and fairness, no matter who the opponent.

ACT Inc. has had multiple contracts just in the last two years that could have opened new revenue streams if we had adequate financing. My case with the Superior Court of New Jersey Essex Docket L-004753-13 shows how the defendants brought our firm's revenue to a grinding halt and imposed life threatening damage to my health. Reasons to approve our loan application are presented in Attachment III.

The Discovery document submitted to the court (Attachment IV) shows a systemic and systematic pattern of deception that caused the precipitous loss of revenue by ACT Inc. While there was a glimmer of hope in 2009, and again in 2012, the firms involved have moved aside the first six law firms they retained to defeat me (see Discovery Ex47: [PROOF](#)) and lined up behind Duane Morris LLP. to avoid taking responsibility for their actions.

The draft motion for a proof hearing shows why: honoring their agreement with me could set the stage for additional losses including their \$100B (estimate) mortgage portfolio to come tumbling down (Attachment V).

The summarized reasons supporting this request are presented in Attachments V, VI, VII, VIII and IX.

The following pages show the SBA's denial of our loan application and why the denial should be reversed. If you have any questions feel free to contact me by phone at 973-762-4100 or by email at .

Thank you,

Veronica Williams  
President

attachments

cc: S. Seiden, Duane Morris LLP with attachments I – V (17 pages)  
Appeals Section, IRS with attachments I – V (17 pages)  
Lloyd Blankfein, CEO, Goldman Sachs with attachments I – V (17 pages)  
Patrick J. Burke, President and Chief Executive Officer, HSBC with attachments I – V (17 pages)  
William Erby, Executive Chairman, Ocwen Financial Corporation with attachments I – V (17 pages)

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## ATTACHMENT I



**U.S. SMALL BUSINESS ADMINISTRATION**  
**Disaster Assistance**  
**Processing and Disbursement Center**  
**14925 Kingsport Road**  
**Fort Worth, Texas 76155**

800-659-2955  
Hearing Impaired  
800-877-8339

September 3, 2013

VERONICA WILLIAMS, PRESIDENT  
ABSOLUTE COMPUTER TECHNOLOGIES, INC.  
PO BOX 978  
SOUTH ORANGE, NJ 07079

**SCANNED**  
SEP 04 2013

RE: Disaster Loan Application No.: 1000219393

Dear Ms. Williams:

In response to your request for reconsideration of your previously declined disaster loan, we have thoroughly reviewed all of your new and previously provided information. With your reconsideration request you submitted 189 pages of documentation including but not limited to the following:

With your reconsideration request you submitted 189 pages of documentation including but not limited to the following:

1. Civil actions filed against Litton Loan Servicing, HSBC Bank USA, Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates Series 2006-C, Goldman Sachs, Ocwen loans, Stern & Eisenberg and PC Powers Kirn, LLC asserting predatory actions.
2. Copies of the formal requests to remove judgments for Capital One and CRAs.
3. Statements of Civil action in process against Capital One for refusing to remove their Judgment against you.
4. Copy of the Superior Court of New Jersey Vacated Default regarding the foreclosure against HSBC Bank USA, National Association As Trustee for Fremont Home Loan Trust 2006-C, Mortgage-Backed Certificates, Series 2006-C.
5. A detailed listing of the "Pattern of Deceit" offering a chronological record of adverse credit events and your reaction to these events.
6. A 14 year, detailed chronological record of personal events and their impact upon your ability to repay debt.
7. Copies of Litton Loan Servicing Modification Confirmation documentation along with copies of submitted checks paid to Litton Loan from Veronica A. Williams.
8. Statement dated May 12, 2010 from FEMA regarding a retracted job offer.
9. Order vacating judgment and execution, dismissing foreclosure proceedings and reinstating bond/note and mortgage for the HSBC Bank USA mortgage.

Although we made every effort to approve your loan request, we are unable to offer you a disaster loan for the following reason(s):

## ATTACHMENT I cont'd.

Absolute Computer Technologies, Inc.  
1000219393

### **Lack of repayment ability**

Our analysis of all the information provided with your loan application concluded your income is insufficient to repay a disaster loan in addition to your existing debts, living expenses, taxes, insurance, and other obligations.

### **Not Eligible**

We have reason to believe unreported income exists based on documentation received by the IRS. Wage transcripts received from the IRS show Unemployment Compensation of \$22,776 received by Veronica A. Williams in tax year 2011 that was not reported on her personal 1040 federal tax returns.

### **Unsatisfactory credit history**

Our evaluation of your credit report and related information indicates that you have not complied with the terms of your prior debt obligations. As a result, we lack reasonable assurance of your willingness or ability to comply with the terms of a disaster loan. We based this decision on information obtained from EQUIFAX P.O. Box 740241 Atlanta, GA 30374 Phone: 1-800-685-1111.

### **Economic injury is not substantiated**

The sole purpose of an Economic Injury Disaster Loan (EIDL) is to help a small business meet its working capital requirements during the disaster-affected period until normal operations resume. Economic injury is a negative change in the financial condition of a small business concern that is directly attributable to the effects of the declared disaster. This change in financial condition must result in the business being unable to meet its obligations as they mature or to pay ordinary and necessary operating expenses.

Generally, we measure economic injury by comparing the gross margins generated by the business during the period affected by the disaster to those generated in similar, non-disaster periods. The differences show the disaster's financial impact on the business' operations. Next, we determine the amount of funds the business and its owners need until normal operations resume. Finally, we compare the disaster's impact on operations with the identified financial needs. The smaller of these two amounts is the business' maximum economic injury eligibility. Economic injury disaster loans cannot exceed the financial requirements the business and its owners could have covered had there been no disaster.

In your case, Gross Revenue claimed after the disaster greatly exceeds historical sales for the same period.

If you disagree with our decision, you have the right to request reconsideration. Your request must:

1. Be in writing and be received by this office **WITHIN 90 DAYS** from the date of this letter.
2. Contain significant new information that you believe will overcome the decline reason(s).
3. Include a completed, signed and dated (with current date), Tax Information Authorization, IRS Form 8821. The form may be obtained from the IRS at [www.irs.gov](http://www.irs.gov) or you may contact our Customer Service Center at 1-800-659-2955.
4. Contain current financial statements (dated **within 90 days**).



**ATTACHMENT I cont'd.**

Absolute Computer Technologies, Inc.  
1000219393

If you have any questions about this action, please contact our office at the above address or the toll free number.

Sincerely,

Kevin Payne,  
Supervisory Loan Officer

The Federal Equal Credit Opportunity Act, 15 U.S.C. § 1691, prohibits creditors from discrimination against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age (provided that the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Protection Act. The Federal agency that administers compliance with this law concerning this creditor is the Consumer Response Center, Federal Trade Commission, Washington, D.C. 20580.



## ATTACHMENT II

### Internal Revenue Service

PO Box 1190  
Ogden, UT 84402

Date: September 16, 2014

ABSOLUTE COMPUTER TECHNOLOGIES INC  
PO BOX 978  
SOUTH ORANGE NJ 07079-0978

### Department of the Treasury

#### Person to Contact:

Jerri L Gibson  
Employee ID  
Number: 1000142994  
Tel: 1-801-620-3360  
Fax: 1-855-857-5865  
Contact Hours: 8 am to 4 pm

#### In Re:

Penalty Appeals

#### Amount of Assessed Penalty(s):

\$2,730.00

#### I.R.C. Section(s):

6699 Failure to File Form 1120S

#### Tax Period(s) Ended:

12/2011 & 12/2012

Dear Ms. Williams:

I completed my review of your request to adjust the penalties assessed against you. Based on the information submitted, I am pleased to advise you the penalties will be abated (removed) in full. When this action has been completed, you will receive an adjustment notice from the Service Center, which originally assessed the penalty.

If you have any additional questions, please contact me at the telephone number listed above.

Sincerely,

  
Jerri L Gibson  
Appeals Tax Specialist



## ATTACHMENT III

### Reasons to Approve Loan Application

To be sure, I've had challenges in my life that many cannot imagine, much less handle. But I've met them head-on and have worked hard to prevail. So when I finally succeeded in positioning my firm to achieve a 40-year goal of closing task orders against a Federal Supply Schedule that took many years to earn, I will not sit back after losing it to deception. The reasons for denial are primarily attributable to problems that occurred as a result the deception by a few financial firms. The other reasons appear to be due to my decision to take legal action against these firms.

<b>SANDY #4086 Business Loan Application: SBA Reference Number: # 1000219393</b>	
<b>REASON FOR DENIAL</b>	<b>WHY DENIAL IS NOT JUSTIFIED</b>
1. Civil actions filed against Litton Loan Servicing, HSBC Bank USA, Premont Home Loan Trust 2006-C Mortgage-Backed Certificates Series 2006-C, Goldman Sachs, Ocwen loans, Stem & Eisenberg and PC Powers Kim, LLC asserting predatory actions.	<b>The Superior Court of NJ awarded me a default judgment Nov. 17, 2014 upon hearing my position and viewing invalid documents from the attorneys. The evidence is clear and compelling. The Discovery document (Attachment IV) and draft of the Motion for Proof Hearing (Attachment V) are included in this document.</b>
2. Copies of the formal requests to remove judgments for Capital One and CRAs.	Upon viewing the proof that I was paying in accordance with the repayment plan established with Capital One representative, Capital One and their representative agreed to remove the judgment once I pay (see Attachment VI). I will as soon as ACT Inc. re-establishes income.
3. Statements of Civil action in process against Capital One for refusing to remove their Judgment against you.	I did not have a Civil action against Capital One and always intended to reach a resolution with them first. Although legal judgment was gained against me without my knowledge, the size of the debt did not justify a legal response. See response to Reason 2 above & the last 2 letters sent to Capital One (see Attachment VI).
4. Copy of the Superior Court of New Jersey Vacated Default regarding the foreclosure against HSBC Bank USA, National Association As Trustee for Fremont Home Loan Trust 2006-C, Mortgage-Backed Certificates, Series 2006-C.	Despite vacating the default against HSBC Bank, the defendants refused to discuss a resolution. Evidence is included in Attachment III.
5. A detailed listing of the "Pattern of Deceit" offering a chronological record of adverse credit events and your reaction to these events.	The "Pattern of Deceit" is truthful and accurate.
6. A 14 year, detailed chronological record of personal events and their impact upon your ability to repay debt.	This history shows my ability to repay under adverse situation. All debts were repaid except the firms that took unfair actions. I have worked out a resolution with Capital One and had to resort to court action when the defendants in Case refused to discuss a resolution.

<p>7. Copies of Litton Loan Servicing Modification Confirmation documentation along with copies of submitted checks paid to Litton Loan from Veronica A. Williams.</p>	<p>This is a reason that we <i>SHOULD NOT</i> have been denied.</p>
<p>8. Statement dated May 12, 2010 from FEMA regarding a retracted job offer.</p>	<p>This was one of the negative outcomes as a result of the defendants' actions. See Attachment IV.</p>
<p>9. Order vacating judgment and execution, dismissing foreclosure proceedings and reinstating bond/note and mortgage for the HSBC Bank USA mortgage.</p>	<p>This court awarded me a judgment against the defendants but the proof hearing has not been held. The Superior Court of New Jersey cases (Essex Docket L-004753-13 &amp; Docket F-00839-13) are in my favor at this time but have not been concluded.</p>
<p style="text-align: center;"><b>REASON FOR DENIAL</b></p>	<p style="text-align: center;"><b>WHY IT IS NOT JUSTIFIED</b></p>
<p><b>Lack of repayment ability</b> Our analysis of all the information provided with your loan application concluded your income is insufficient to repay a disaster loan in addition to your existing debts, living expenses, taxes, insurance, and other obligations.</p>	<p>The contract that would have supported the loan was ended because we did not have the funds to cover the cash flow necessary to carry the contract. We will not accept a loan until and unless our contracts will allow us to make all payments.</p>
<p><b>Not Eligible</b> We have reason to believe unreported income exists based on documentation received by the IRS. Wage transcripts received from the IRS show Unemployment Compensation of \$22,776 received by Veronica A. Williams in tax year 2011 that was not reported on her personal 1040 federal tax returns.</p>	<p>A fraudulent federal tax return was filed for Tax Year 2011 using Veronica Williams' name and social security number (see Attachment VIII). I warned the IRS long before the refund check should have been mailed to the thief. Veronica was the victim of identity theft again in 2012. Despite numerous phone calls and letters, it took years to clear up the tax records of Veronica Williams and ACT Inc. The IRS waived the final fees for ACT Inc. Sept. 2014. All tax returns due for Veronica Williams and ACT Inc. have been filed. I have received closure from the IRS through the 2012 Tax Year and expect closure of Tax Year 2013.</p>
<p><b>Unsatisfactory credit history</b> Our evaluation of your credit report and related information indicates that you have not complied with the terms of your prior debt obligations. As a result, we lack reasonable assurance of your willingness or ability to comply with the terms of a disaster loan. We based this decision on information obtained from EQUIFAX P.O. Box 740241 Atlanta, GA 30374 Phone: 1-800-685-1111.</p>	<p>I filed a legal complaint against the financial firms responsible for the decline in my credit. I was awarded a judgment by the Superior Court of New Jersey on Nov. 17, 2014. I am preparing a motion for the proof hearing to determine the amount of damages that I should receive. See Attachments IV and V.</p> <p>Most of Veronica Williams' and ACT's debt was retired during the fall of 2009 (see Attachment IV, Discovery Exhibit 14: Ex14: <a href="#">PROOF</a>). All major credit reporting agencies have been notified of errors in Williams' report, to no avail. Williams' credit will not be repaired until the case against the financial firms has been settled or concluded. At that time, credit reports by Experian, Equifax and Trans Union will be corrected. Dun &amp; Bradstreet information will also be reviewed.</p>

**Economic injury is not substantiated**

The sole purpose of an Economic Injury Disaster Loan (EIDL) is to help a small business meet its working capital requirements during the disaster-affected period until normal operations resume. Economic injury is a negative change in the financial condition of a small business concern that is directly attributable to the effects of the declared disaster. This change in financial condition must result in the business being unable to meet its obligations as they mature or to pay ordinary and necessary operating expenses.

Generally, we measure economic injury by comparing the gross margins generated by the business during the period affected by the disaster to those generated in similar, non-disaster periods. The differences show the disaster's financial impact on the business' operations. Next, we determine the amount of funds the business and its owners need until normal operations resume. Finally, we compare the disaster's impact on operations with the identified financial needs. The smaller of these two amounts is the business' maximum economic injury eligibility. Economic injury disaster loans cannot exceed the financial requirements the business and its owners could have covered had there been no disaster.

In your case, Gross Revenue claimed after the disaster greatly exceeds historical sales for the same period.

Our economic injury was primarily attributable to financial firms named in the complaint with the Superior Court of New Jersey. ACT was in a recovery when Hurricanes Irene and Sandy hit. Our sales cycles are 6 months to 2 years; our business cycles are 3 to 7 years. A business cycle starts with the initial sales effort and ends once the obligations have been delivered and all projects have been closed. Since our business and contract cycles typically last 5 years, it is not in accordance with financial analytical practices to view financial impact on an annual basis.

***THE INFORMATION BELOW WILL BE COMPLETED ONCE THE SBA HAS ELIMINATED ALL PREVIOUS ISSUES.***

If you measure economic injury by comparing the gross margins generated by the business during the period affected by the disaster to those generated in similar, non-disaster periods, the decline is **TBD** %.

Next, the amount of funds the business and its owners need until normal operations resume is determined by the contracts at the time that the loan would be accepted by ACT Inc.

Finally, the disaster's impact on operations with the identified financial needs is approximately **\$TBD**.

The smaller of the amount the business and owner needs and the disaster's impact, is the former/latter. ACT's maximum economic injury eligibility is therefore **\$TBD**.



<b>IRENE #4021 Business Loan Application: SBA Reference Number: # 1000115934</b>	
<p align="center"><b>REASON FOR DENIAL</b></p>	<p align="center"><b>WHY IT IS NOT JUSTIFIED</b></p>
<p><b>Unsatisfactory credit history</b>  As you are aware, your loan application was previously declined due to unsatisfactory credit history. Your letter indicated your credit issues were related to ongoing medical problems and a downturn in the economy. We have reviewed your Credit Bureau Report and all the accompanying documentation you have provided regarding the status of your credit and mortgage accounts. After a thorough review we conclude you have not provided sufficient information to overcome the decline for credit. Therefore, your loan remains declined.</p>	<p>I filed a legal complaint (Essex Docket L-004753-13) against the financial firms responsible for the decline in my credit. I was awarded a judgment by the Superior Court of New Jersey on Nov. 17, 2014. I am preparing a motion for the proof hearing to determine the amount of damages that I should receive. See Attachments IV and V.</p>
<p><b>Lack of repayment ability</b>  Our analysis of your historic Federal Tax Returns, 2011 year to date profit and loss statement and all the information provided with your loan application we concluded your income is insufficient to repay a disaster loan in addition to your existing debts, living expenses, taxes, insurance, and other obligations.</p>	<p>The contract that would have supported the loan was ended because we did not have the funds to cover the cash flow necessary to carry the contract. We will not accept a loan until and unless our contracts, and other sustainable profit, will allow us to make all payments.</p>
<p><b>Not eligible due to Policy Reasons</b>  Absolute Computer Technologies, Inc. is not in Good Standing with the New Jersey Department of Treasury, Division of Revenues. A legal entity which is not in Good Standing in the state in which it is organized and the state in which the disaster occurred is not eligible for disaster assistance.</p>	<p>Absolute Computer Technologies, Inc. was reinstated by the New Jersey Department of Treasury Jan. 23, 2013 (see Attachment VII). We should be in Good Standing with the New Jersey Department of Treasury, Division of Revenue.</p>

## ATTACHMENT IV

### Discovery Document Submitted to the Superior Court of New Jersey

(This attachment, Pages 12 – 16, provides links to documents; together they comprise the 750 page submission)

(To see the entire document filed with the court, [click here](#))

## DISCOVERY INFORMATION FOR DOCKET NO. ESSEX-L-004753-13

### A CIVIL ACTION

Veronica Williams, Plaintiff

vs.

Litton Loan Servicing, HSBC Bank USA, N.A., Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates, Series 2006-C, Goldman Sachs, Ocwen, Superior Court of New Jersey \* Law Division: Essex County

VERONICA WILLIAMS, Plaintiff  v.  LITTON LOAN SERVICING, HSBC BANK USA, N.A., FREEMONT HOME LOAN TRUST 2006-C MORTGAGE-BACKED CERTIFICATES, SERIES 2006-C; GOLDMAN SACHS; OCWEN, STERN & EISENBERG, PC, POWERS KIRN, LLC,  Defendants.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: ESSEX COUNTY  DOCKET NO.: ESX-L-004753-13  A Civil Action  REQUEST TO ENTER DEFAULT
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**In response to a request from the attorney representing all defendants (Stuart I. Seiden of Duane Morris), I (the Plaintiff) have prepared this document that further clarifies and streamlines the “1500 pages” Mr. Seiden said my former attorney gave to him. I believe this includes a subset of that information, with explanations to help him better understand this matter. In response to Mr. Seiden’s request, I assembled my proof in a timeline with further explanation, to help him understand what happened.**

**To help better understand this matter, Mr. Seiden’s clients can help explain the financials, operational, regulatory and other pertinent information.**

**A summary of what happened, with links to proof, is presented in the following pages.**

## **SERIAL ERRORS, FRAUD, or BOTH?**

### **SUMMARY**

**This document explains how a series of actions by the defendants caused the financial ruin and near death of Veronica Williams. Links to documents, video and audio files corroborate the explanation. Additional information can be provided to those with a need to know.**

**The following outline provides a chronological summary of how:**

- A series of deceptive & fraudulent actions led to decimation of my income and health
- I have tried for 7 years to reverse the negative impact as the defendants dragged me through the mud and avoided taking responsibility for their actions
- Refusal to account for \$208,000 discrepancy in principal balance
- Am now trying to get my day in court, before a jury of my peers

**More than 40 years of time, money and effort went into preparing my firm – ACT Inc. – for the impending orders on our US GSA contract. The new orders required that I consolidate my operations. To achieve this, I decided to sell my home. After listing my home 3 times between 2005 and 2007 ([PROOF](#)) without an offer over \$175,000, I decided to stay. My second option was to lower my cost of capital and operations costs by restructuring debt, a common practice. Several firms offered to refinance my mortgage, I chose Litton Loan.**

### **CREATED DEBT RESTRUCTURE PLAN IN PREPARATION FOR IMPENDING ORDERS**

**2008 approached mortgage firms to refinance. Narrowed my choice to Chase & Litton (had just bought my loan)**

- Chase offered 3% for both mortgages
- Had Several Conversations with Litton Loan
  - Told them of my concern: I refinanced in 2006 due to Litton Loan's bad reputation and recording payments late (**PROOF: &Ex1:Pmt-2005 & Ex2:Refinance**)
  - Litton Loan added about \$112,325 & Fremont added about \$95,675 to my principal (Ex3:[PROOF](#))
  - I refinanced with **Fremont Loan** to escape Litton Loan (for mortgage history see Ex2:[PROOF](#) )
  - I ended up back with Litton Loan, so why accept a modification and stay with Litton??
  - Litton made compelling offer & said Goldman Sachs' ownership gave them new integrity
  - Litton told me they were now owned by Goldman Sachs and I did not have to worry
  - Litton assured me they would give me a modification if HAMP did not come through Ex4 [PROOF](#)
  - Even after "errors (returning my check, too many iterations of spreadsheet, countless phone calls) I was assured verbally & in writing that the modification would be confirmed upon receipt of my checks. (Ex5 [PROOF](#))
  - I was further assured that the modification would be approved by HAMP or Litton Loan and the attached document was sent in error
- Litton reduced my mortgage principal but not enough (Ex3:[PROOF](#))
- In addition to the amount Litton Loan had added to my principal, Fremont added about \$95,675 to my principal (Ex3:[PROOF](#))
- My intention was to accept the unjustified additions to principal, focus on the FEMA job and closing task orders against my firm's GSA contract, and use the modification to lower my costs of financing.
- Despite excessive addition to principal I decided to proceed, to focus time on ACT Inc. customers; heightened acquisition effort allowed ACT Inc. to achieve recognized and approved vendor status with multiple Federal Agencies. (Ex6: [PROOF](#)) Stepped up marketing and sales in 2005 (DoD working Group, IRA meetings, Proposals show DHS, DC, HUD – Ex7: [WITNESS](#))
- Sept. 2009 - Received job offer from FEMA to gain immediate "past performance"; contingent upon security clearance approval (Ex8: [PROOF](#))

## **LAUNCHED DEBT RESTRUCTURE PLAN \* I PROCEEDED WITH PLAN**

- Jan-Dec 2009 Litton Loan's representatives asked for extensive information and detailed analysis, ***reassuring me along the way that my modification would be forthcoming.*** Some of the documents submitted include, but are not limited to:
  - 2/25/09 to Julius Connor Ex9: [PROOF](#)
  - 3/28/09 to Brenda Moreno Ex10: [PROOF](#)
  - 8/2/09 to Loss Mitigation Dept. Ex11: [PROOF](#)
  - 9/28/09 to Loss Mitigation Dept. Ex12: [PROOF](#)
  - 12/28/09 to Bessie Cahee Ex13: [PROOF](#)
  - Jan-Nov Submitted several other requested analyses (*COPIES AVAILABLE UPON REQUEST*)
- I paid off uncollateralized debt (Ex14: [PROOF](#))
- I purchased money order and sent it with returned checks to Litton (Ex15:[PROOF](#), Ex16:[PROOF](#), Ex17:[PROOF](#))
- Continued with my "living mobile" trial/prep for FEMA job (Ex7: [WITNESS](#))
- Cultivating business relationships and improved remote operations for ACT Inc. (Ex7: [WITNESS](#))
- Completed E-Quip & responses for Federal Security Clearance on 12/12/2009 (Ex18:[PROOF](#) & Ex7: [WITNESS](#))

## **WHEN I WAS STUNNED WITH NOTICE OF FORECLOSURE JUST BEFORE HEARING**

- Began drive from Ft. Lauderdale, FL to South Orange, NJ – alone (Ex7: [WITNESSES](#))
- Arrived in NJ about 4am the morning of the foreclosure hearing (Dec. 23, 2009)
- Too Exhausted to attend; Foreclosure was granted for Docket F- 28279-09 (Ex19: [PROOF](#))
- Was told it was an error and would be reversed if I sent an additional payment (Ex20:[PROOF](#))
- I completed all payments required for my modification (Ex15: [PROOF](#) )

## **FORECLOSURE GRANTED AND MY SUFFERING BEGAN**

- Dec. 2009 Litton Loan reneged on modification by foreclosing (Ex19:[PROOF](#))
- Dec. 2009 Litton said they could stop foreclosure if I documented what we discussed (Ex13: [PROOF](#) )
- Jan. 2010 Litton Loan's staff was unaware of the legal response by their attorney. With apology for Litton's errors and a promise of the immediate reversal of foreclosure and confirming the modification, I made more payments (Ex21: [PROOF](#) & Ex22: [Pmt-2010](#) & Ex15:[PROOF](#))
- Mar 2010 Lost Clearance (Ex23:[PROOF](#) & Ex7: [WITNESS](#))
- 3/16/10 Lost GSA contract (Ex24:[PROOF](#) & Ex7: [WITNESSES](#))
- 5/12/10 Lost FEMA job (Ex23:[PROOF](#) & Ex7: [WITNESSES](#))
- By 2010 Lost strong credit ratings (D&B, Trans Union, Equifax, Experian)
- 2010→ Health declined (Ex25:[PROOF](#) & Ex7: [WITNESSES](#))
- 2010→ My company –AC T Inc. – now in jeopardy (Ex7: [WITNESSES](#))
- 2010→ Ability to find jobs decimated (Ex26: [PROOF](#) & Ex7: [WITNESSES](#))

## VW FOUGHT BACK

- DATE Tried to get Litton Loan, Goldman Sachs & HSBC to review my account & create a win-win solution (Ex27: [PROOF &](#) Ex28: [PROOF](#) Ex29: [PROOF](#) Ex30: [PROOF](#) Ex7: [WITNESSES](#))
- 2010 - 2011 Litton Loan and Goldman Sachs refused to discuss the matter (Ex31: **PROOF &** Ex7: [WITNESSES](#))
- DATE Appealed to NJ Banking Commission, SEC, Federal Reserve & others (Ex32: [PROOF](#) Ex33: [PROOF &](#) Ex7: [WITNESSES](#))
- Aug 2011 Filed legal complaint against Litton Loan & Goldman Sachs (Ex34: [PROOF](#))
- DATE Served Litton Loan & Goldman Sachs (Ex35: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 1, 2011 Goldman Sachs sold Litton Loan to Ocwen (Ex36: [PROOF &](#) Ex37: [IN THE NEWS](#) or *COPY TO COURT ONLY* & Ex38: [SEC or SECprt](#) & Ex7: [WITNESSES](#))
- Sept. 1, 2011 Federal Reserve orders Goldman Sachs to conduct Foreclosure Review (Ex36: [PROOF](#))
- 2011 Litton Loan's attorney never responded to questions (Ex35: [PROOF](#))
- Sept. 16, 2011 Neither Litton Loan nor Goldman Sachs (did not) showed up at court hearing – VW granted motion (Ex35: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 2011 Litton Loan-Goldman Sach's attorney used court error to disqualify hearing so I withdrew and refiled (Ex35: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 2011 Defendant's attorney obtained dismissal on a technicality. Judge said court could not make defendants wait until I recovered (Ex35: [PROOF](#))

## OCWEN-HSBC-GOLDAN SACHS SHOWED NO INTENTION OF DISCUSSING VIABLE SOLUTION – PLAINTIFF'S HEALTH WORSENERD

- Fall 2011 Ocwen started collection, ignored letters and refused to discuss any alternatives (Ex38: [PROOF &](#) Ex39: [PROOF & PROOF &](#) Ex7: [WITNESSES](#))
- 2011-2012 My health declined more (Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- March 2012 Foreclosure Dismissed *with intention of collecting money rather than resolving errors* (Ex40: [PROOF](#))
- 2011 – 2013 Goldman Sachs and HSBC ignored VW, backing Ocwen as they bullied me with collection (Ex35: [PROOF &](#) Ex38: [PROOF &](#) Ex7: [WITNESSES](#))
- Sept. 2012 Hospitalized for stress (Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 2012 Hospitalized for stress ( Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- Began praying and meditating throughout the day, every day
- Jan. 2013 Hospitalized for stress (Ex25: [PROOF &](#) Ex7: [WITNESSES](#))
- Feb. 2013 Gathered strength to prepare meals and drive (Ex7: [WITNESSES](#))

## VW CONTINUED TO FIGHT BACK

- March 2013 Resumed physical therapy after 4 months of life threatening health condition (Ex7: [WITNESSES](#))
- Spring 2013 VW searched for attorney with courage & knowledge to represent me (Ex7: [WITNESSES](#))
- April 2013 Tried to secure HAMP again, directly via HUD this time (Ex41: [PROOF](#))
- March 2013 → HAMP 1<sup>st</sup> – Lisa Ferri (Ex42: [PROOF](#)), 2<sup>nd</sup> Michael Martin (EX43: [PROOF](#)-audio only & [PROOF](#)), 3<sup>rd</sup> JasonBurak said my case is “out of scope” (emails removed by NovaDebt 10//14).
- 2011 – NOW Property continued to decline, FEMA denied repairs, insurance repair check sent to Litton (Ex44: [BEFORE - AFTER](#))
- April 24, 2013 VW retained Denbeaux & Denbeaux (Ex45: [PROOF &](#) Ex7: [WITNESSES](#)) Foreclosure Litigation
- June 2013 Filed new complaint against all defendants (Ex46: [PROOF](#))
- Next 12 months Lots of legal filings, hearings; HSBC started foreclosure proceedings again (Ex47: [PROOF](#)♦[UPDATED](#))
- Feb. 2014 HSBC attorney says drop suit, pay up, move or else. Plaintiff said NO and dug in.
- Aug. 2014 Tried again to get HAMP offer (Ex41: [PROOF](#))
- Sept. 2014 IRS waived fees due to stress imposed health problems (Ex48: [PROOF](#))
- Sept. 2014 VW called Mediator to find out what happened in July hearing. Told of discussions that I consider a “professional reminder of Goldman Sachs’ & Duane Morris’ power” (Ex7: [WITNESS](#))
- Oct. 2, 2014 VW completed 4 hour deposition *with redundant questions* (cancelled physical therapy). Defendants’ attorney showed mortgage documents that were questionable (Ex49: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 22, 2014 Defendants’ attorney promises to sue Denbeaux if they lose (Ex50: [PROOF](#) & [PROOF](#))
- Oct. 27, 2014 Denbeaux withdraws (Ex51: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 23, 2014 Attorneys for Plaintiff and Defendants “confirm” trial date moved to Jan. 15, 2015 (Ex53: [PROOF](#))
- Oct. 27, 2014 VW launches fundraising campaign (Ex52: [PROOF &](#) Ex7: [WITNESSES](#))
- Oct. 28, 2014 VW begins search for new attorney
- Nov. 1, 2014 VW responds to Defendants’ letter via Seiden (Ex50: [PROOF](#) & [PROOF](#) & Ex7: [WITNESSES](#))
- Nov. 14, 2014 Learns that trial date HAS NOT been changed to Jan. 15, 2015



**ATTACHMENT V**  
***Draft of Motion for Proof Hearing***

We request compensatory damages of \$ \_\_\_\_\_ M for the Plaintiff. Punitive damages should be determined by the court.

No amount of money can compensate for the near death incidents and trauma that the defendants put me through.

The defendants' actions inflicted severe injury in the Plaintiff warranting payment of the following damages:

<b>HURT TO PLAINTIFF</b>	<b>DAMAGES INCURRED</b>	<b>DAMAGES SOUGHT</b>
<b>COMPENSATORY</b>	<b>DOLLARS IN MILLIONS</b>	
• Loss of ACT Inc. contracts (\$279M)	\$279.2 M	TBD
• Loss of Employability in field of experience (\$1.8M [\$300K * 6 YRS- 2009-2015])	\$2.1M	TBD
• Stress Induced Severe Prolonged Illness	\$500.0 M	TBD
<b>PUNITIVE</b>	SEVERE	TBD

Much of the proof is provided in the [Discovery](#) document filed with the court. Several witnesses will attest to injuries and proof documents are included. Recent validation from the Federal government is attached to this document.

**LOSS OF ACT INC. CONTRACTS**

I invested 40 years, and in recent years, hundreds of thousands of dollars, to position ACT Inc. for lucrative, multi-year Federal task orders. ACT Inc. had been awarded Federal Supply Schedules, was positioned with multiple Federal agencies, and the Plaintiff was offered a FEMA job that would have given her a security clearance and the US Dept. Homeland Security past performance necessary to close task orders against ACT Inc.'s Federal Supply Schedule. The defendants' reneged on the modification, causing everything to be lost. Details are provided in the Discovery document.

**LOSS OF EMPLOYABILITY**

As a financial, operations and information technology professional, the Plaintiff's ability to secure jobs depends on clean credit and no legal actions. While her record earned the Plaintiff and her firm contracts from major companies over her 35+ year career, she has been denied hundreds of jobs since the defendants' actions.

**STRESS INDUCED SEVERE PROLONGED ILLNESS**

Defendants began deceptive actions in 2002. Their deception intensified in 2008. Despite convincing the Plaintiff that new ownership by Goldman Sachs had cleaned up their act, the deception of all defendants grew immensely. The Plaintiff did not realize the impact that the defendants' actions had on her health until her doctors began asking more probing questions. Soon it was clear that the Plaintiff's symptoms were directly correlated to and the direct result of, continued deception and depraved actions of the defendants. Between September 2012 and January 2013, she was hospitalized 3 times for stress induced illness. Her team of doctors ran every conceivable test to prove this.

**WHY HAVE DEFENDANTS SPENT MORE TO TAKE PLAINTIFF'S HOME THAN IT IS WORTH?**

- The deception and fraud is clearly documented
- Dramatic decline in property value known to FEMA, HUD, HAMP, Ocwen and other defendants
- Hurricane Irene, Sandy, and poor maintenance warrant repairs that will exceed \$120,000
- Defendants fought with 6 law firms (Ex47: [PROOF](#)), plus investigators, insurance firms and other since 2010

**BECAUSE.....**

- Plaintiff's case exposes "in and out" mortgage fraud
- 28.9% of US homeowners have been foreclosed upon (There have been [over 25 million foreclosures in the US since 2000.](#))
- New Jersey is #2 in foreclosures among US states
- HSBC is #2 bank in the world with assets of \$2.723Trillion
- Goldman Sachs is #28 bank in the world with assets of \$1.505Trillion
- \$263.7Million is what Ocwen paid Goldman Sachs for the Litton portfolio ([app 300K loans](#) ~ \$879 per loan?!)
- Value of mortgage portfolios involving HSBC likely to exceed \$100Billion [Forbes](#); HSBC sold only \$3.2Billion in 2013 [Bloomberg](#) & [NYTimes](#) & [HousingWire](#)
- HSBC left the US after underwriting Billions in mortgages and facilitating foreclosures
- There are foreclosures pending that will allow HSBC to take even more money out of the US



**ATTACHMENT V cont'd.**  
***Draft* of Motion for Proof Hearing**

**SUMMARY OF WHAT HAPPENED**

**The first defendant (Litton Loan) purchased my mortgage when my equity was about three times the amount of the principal balance of my mortgage. Due to their predatory reputation, I refinanced with the second defendant (Fremont) to get it out of the hands of Litton Loan. Fremont's mortgage had been underwritten by the third defendant (HSBC). A year later Fremont, the company that sold me the mortgage, went out of business and the first defendant (Litton Loan) acquired my mortgage again. During this time the fourth defendant (Goldman Sachs), a prominent US based financial firm, bought the first defendant (Litton Loan). So rather than move my mortgage to a financial firm who offered me a lower rate (Chase), I decided to accept the modification from the first defendant (Litton Loan) who was now owned by the fourth defendant (Goldman Sachs). A series of mistruths and deception by all defendants cost me everything I've worked for over the last 53 years, and almost took my life several times. To make matters worse, the defendants holding the mortgage have repeatedly failed to explain \$208,000 that has been added to the mortgage principal since this series of transactions began. The evidence supporting this statement is presented over and over in the Discovery document submitted to the Superior Court of New Jersey (download [click here](#)).**

***COMPLETE MOTION AVAILABLE UPON REQUEST***



We Turn Technology  
... into Value

Absolute Computer Technologies, Inc.

**ATTACHMENT VI**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

September 16, 2013

Capital One  
Office of Executive Resolution  
15000 Capital One Drive  
Richmond, VA 23238

Attn: Patricia Dumas

Subject: Effort to Remove Invalid Judgment against Veronica Williams and Settle  
Account No. 4121 7426 5028 0723

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Docket No.: DC-022808-09 (on file with the Superior Court of New Jersey)

Sent via facsimile to Fax 888-259-3021 total of 21 pages

Dear Trish:

I am writing to confirm our latest conversation. I will pay a final settlement of \$375 to Capital One. I can no longer pay \$620. Since our last conversation I have settled with another creditor, reducing the amount available from the final payment received from my firm's client.

Prior to sending the payment, however, we must receive written confirmation from Capital One and any of your affiliate firms or individuals for review by our advisors. Without a legally binding settlement letter, I will must include previous letters to Capital One (copies attached) in our applications for credit. The US Small Business Administration and Internal Revenue Service have been copied to demonstrate my good faith efforts to resolve this eight year old debt that was charged off April 28, 2007.

Trish, I appreciate your efforts that resulted in Capital One reversing their decision in the August 1, 2013 letter and allow you to intercede in an attempt to resolve this. You have made a stellar effort and it is now in the hands of Capital One senior management. The original attorney who handled this, and duplicitously initiated the judgment, worked for Arthur Nudelman of Nudelman, Nudelman and Zeiring (see attachments). You indicated the current attorney of record is Keith Golub of Nudelman Klemm & Golub PC. Again, based on past actions I no longer trust, nor am I willing to work with, any firm with which Arthur Nudelman is affiliated. I cannot afford an attorney to intervene. I hope that Capital One will step up, if necessary, and right this wrong.

I trust we can finally settle this account. Please send your response to me via facsimile at 888-

[Redacted]

[Redacted signature]

Veronica Williams

attachments

cc: Mr. Richard Fairbank, Founder, Chairman & CEO, Capital One via facsimile to [Redacted]  
Ms. Sancho c/o Danny Wertel, Principal Deputy Commissioner, IRS via email [Redacted]  
Mr. Kevin Payne, Supervisory Loan Officer, SBA Disaster Loan Assistance via email [Redacted]

RE: Disaster Loan Application No.: 1000219393



**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

**SUMMARY AND LIST OF ATTACHMENTS**

**EFFORTS TO SETTLE DEBT WITH CAPITAL ONE**

ACCOUNT NUMBER	COLLECTION REPRESENTATIVE	STATUS
4121 7426 5028 0723	Nudelman, Nudelman & Zeiring	<b>RENEGED ON 9/29/09 SETTLEMENT</b>
4121 7416 3523 0399		ACCOUNT NOT SETTLED
4791 2424 1607 2877	Northland Group	SETTLED 10/17/09
4155 5720 7673 4857	Capital One Recovery Cheterie Cunningham	SETTLED 10/8/09
4155 5720 7673 4857	Northland Group	SETTLED 12/4/09
4155 5720 7673 4857	Northland Group	SETTLED 12/10/09

**ATTACHMENTS**

**PRESENTED IN ORDER LISTED IN DOCUMENT**

ADDRESSED TO	FROM	DATE
Mr. Richard Fairbank Founder, Chairman, and Chief Executive Officer Capital One 15000 Capital One Drive Richmond, VA 23238	Veronica Williams	June 24, 2013
Veronica Williams, PO Box 978, South Orange, NJ	Capital One	August 1, 2013
Capital One and all other creditors	Veronica Williams	March 31, 2009
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	March 1, 2009
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	ACT Inc.	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	June 2, 2008
CapitalOne, P.O. Box 26074, Richmond, VA 23260	Veronica Williams	April 26, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	September 14, 2008
CapitalOne, P.O. Box 70884, Charlotte, NC 28272-0884	Veronica Williams	June 2, 2008
CapitalOne, P.O. Box 26074, Richmond, VA 23260	Veronica Williams	April 26, 2008





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... into Value

Absolute Computer Technologies, Inc.

**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

---

June 24, 2013

Mr. Richard Fairbank  
Founder, Chairman, and Chief Executive Officer  
Capital One  
15000 Capital One Drive  
Richmond, VA 23238

Subject: Remove Invalid Judgment from Veronica Williams' Credit Reports  
Account No. 4121 7426 5028 0723

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Your File No: NN50466  
Docket No.: DC-022606-09 (on file with the Superior Court of New Jersey)

Sent via facsimile to Fax 888-250-3021

Dear Mr. Fairbank:

The firm that represented Capital One engaged in deceptive practices and acted in bad faith. The result was substantial health and financial injury to me and my company. At the very least, Capital One should have the judgment vacated and the debt forgiven.

Please send written confirmation of the vacated judgment and zero balance on this account to me via facsimile at [REDACTED] or email to [REDACTED]

Thank you ✓  
[REDACTED]

Veronica Williams

attachments



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**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

June 24, 2013

<b>TransUnion</b> P.O. Box 6790 Fullerton, CA 92834 File# 193083666	<b>Experian</b> P.O. Box 9530 Allen, TX 75013 File# 0068602061	<b>Equifax</b> P.O. Box 740241 Atlanta, GA 30374 File# 8211057701
------------------------------------------------------------------------------	-------------------------------------------------------------------------	----------------------------------------------------------------------------

Subject: Remove Invalid Judgment from Veronica Williams' Credit Reports

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Your File No: NN50466  
Docket No.: DC-022606-09 (on file with the Superior Court of New Jersey)

Dear Sir/Madam:

The judgment by Capital One is not valid and should be removed from my credit reports immediately. I expect that Capital One will take immediate steps to have this judgment vacated.

I was never notified of the court action nor the date of this action. The greater injustice is that Arthur Nudelman repeatedly failed to confirm that they had legal jurisdiction over my debt. Negotiated a repayment plan in good faith and made all payments to Capital One (the legitimate holder of the debt). The repayment plan is provided in Attachment II.

DATE	PAYMENT
12/15/2009	\$145.00
11/26/2009	\$145.00
10/8/2009	\$ 50.00
PREVIOUS PAYMENTS	
7/24/2008	\$ 30.00
6/12/2008	\$ 30.00

Capital One has confirmed receipt of all payments (Attachment I).

I had several conversations with Greg Moore of Nudelman, Nudelman & Ziering and told him repeatedly I was sending the agreed upon payments to Capital One and would only make checks payable to Arthur Nudelman after they or Capital One provided me written confirmation that Arthur Nudelman or his firm was legally entitled to collect payments. They failed to do so and managed to get a judgment without notifying me.

As a result of their action of Arthur Nudelman and his firm, I suffered substantial financial losses and incredible stress. I was in the final stages of being reviewed for a security clearance for a Federal job and major task order against my Federal contract. The judgment was assessed one week before I was to be cleared. As a result of Arthur Nudelman and his firm's action, I lost the clearance, job, impending tasks orders and contract.

Please send copies of my corrected credit report to me via facsimile at 888-492-5864.

Thank you



Veronica Williams

attachments

cc: Richard Fairbank, Founder, Chairman, and Chief Executive Officer, Capital One  
Greg Moore, Nudelman, Klemm & Golub via email [g \[redacted\]](#)



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Absolute Computer Technologies, Inc.

**ATTACHMENT VI cont'd.  
Capital One Judgment Awarded Without Notice  
Awarded *Without My Knowledge While I Honored Repayment Plan*  
To Download These Two Letters [Click Here](#)**

**Veronica Ann Williams**

Mailing Address: P.O. Box 978 ◀ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ◀ South Orange, NJ 07079-3009

---

**ATTACHMENT I**

06/12/2013 THU 8:30 PM 8345881687 Capital One

06/12/2013



PO Box 3058  
Salt Lake City, UT 84104-0258

June 12, 2013

Veronica Williams  
PO Box 978  
South Orange NJ 07079

Re: XXXXXXXXXXXXXXXX123  
case #: 10001910328950  
fax # 888-492-9864

Dear Veronica Williams:

Thank you for your recent inquiry.

This is to confirm the payments that posted to your account: \$145.00 on 12/15/2009, \$145.00 on 11/26/2009 and \$50.00 on 10/06/2009. There were no payments that posted to your account on 07/24/2009 and 08/12/2009. However, a \$30.00 payment posted on 07/24/2008 and a \$30.00 payment posted on 05/12/2008. If you need additional information please give us a call.

If you have any questions, or need any additional information, please give MCO a call at 800-268-1706.

Sincerely,

Capital One Service, LLC





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Absolute Computer Technologies, Inc.

**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 + South Orange, NJ 07079-0978  
Residence - NO MAIL: 541 Scotland Road + South Orange, NJ 07079-3009

September 26, 2013

Mr. Richard Fairbank  
Founder, Chairman, and Chief Executive Officer  
Capital One  
15000 Capital One Drive  
Richmond, VA 23238

Subject: CONTINUED Effort to Remove Invalid Judgment against Veronica Williams and Settle  
Account No. 4121 7426 5028 0723

Re: Capital One Bank (USA), N.A. vs. Veronica Williams  
Docket No.: DC-022606-09 (on file with the Superior Court of New Jersey)

Sent via facsimile to Fax 888-259-3021 total of 5 pages

Dear Mr. Fairbank:

I did not receive a response to the attached correspondence sent to the Capital One Office of Executive Resolution, so I am addressing this request to you.

Capital One should repair the damage to my credit caused by the duplicitous and egregious actions of its creditors and internal recovery department.

Capital One sent The Northland Group after me while Capital One's Internal Recovery Dept. pursued me to collect money for the same account - at the same time. I was so determined to do my best to honor and settle my debts that I did not realize I had paid and settled the same account with Northland and with Capital One until I prepared last week's letter. Capital One should pay Nudelman et. al. the money they want or intervene to do what is necessary to reverse the judgment and close my account with written notice to all collection agencies that this account has been "settled without an outstanding balance".

Here are snapshots of what I described:

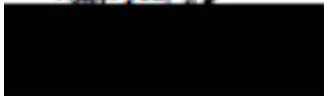
EFFORTS TO SETTLE DEBT WITH CAPITAL ONE

ACCOUNT NUMBER	COLLECTION REPRESENTATIVE	STATUS
4121 7426 5028 0723	Nudelman, Nudelman & Zeiring	RENEGOTIATED ON 9/26/09 SETTLEMENT ACCOUNT NOT SETTLED
4781 2424 2607 2677	Northland Group	SETTLED 20/11/09
4155 5730 7673 4657	Capital One Recovery Cherise Cunningham	SETTLED 20/8/09
4155 5730 7673 4657	Northland Group	SETTLED 12/14/08
4155 5730 7673 4657	Northland Group	SETTLED 12/30/09

Copies of the letter that includes the chart above, and other documents, are available upon request.

I look forward to a final resolution to all Capital One accounts. Please send written confirmation via facsimile to 888-492-5864.

Thank you,



attachments

cc: Capital One Office of Executive Resolution, Attn. Patricia Dumas via email





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Absolute Computer Technologies, Inc.

**ATTACHMENT VI cont'd.**  
**Capital One Judgment Awarded Without Notice**  
**Awarded *Without My Knowledge While I Honored Repayment Plan***  
To Download These Two Letters [Click Here](#)

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence - NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

**ATTACHMENT I**



No. 7318 P. 2/3

Wednesday, December 02, 2009

Veronica Williams  
P.O. Box 978  
South Orange, NJ 07079

Re: Your account number: 415537207573-4857  
Customer number: 697281319  
Creditor: Capital One

Dear Veronica Williams

Thanks for your payment of \$407.86, which we received on 10/09/09. This payment settles your Capital One account, and we'll stop collection efforts on the remaining balance.

We'll notify the following credit reporting agencies that your account has been settled with an outstanding balance:

<b>Experian</b> P.O. Box 1395 Allen, TX 75013 1-888-397-3742 www.experian.com	<b>Equifax</b> P.O. Box 140296 Atlanta, GA 30374 1-800-685-1111 www.equifax.com	<b>TransUnion Corporation</b> P.O. Box 2000 Cherry, PA 15022 1-800-888-4213 www.transunion.com	<b>Innovis</b> P.O. Box 1534 Columbus, OH 43216 1-800-540-2505 www.innovis.com
-------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------

The credit reporting agencies may take up to 30 days to update the information on your credit report. You can contact the agencies directly if you have questions. Please note that for your benefit, we may review your credit report to assure that this account has been updated properly.

If you have questions about your account, please give us a call at 1-800-258-0311. Our office hours are 8am to 8pm Eastern Time, Monday through Friday.

Thanks for paying your outstanding balance.



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Absolute Computer Technologies, Inc.

**ATTACHMENT VII**  
**Absolute Computer Technologies, Inc.**  
**Certificate of Reinstatement**

Fax:

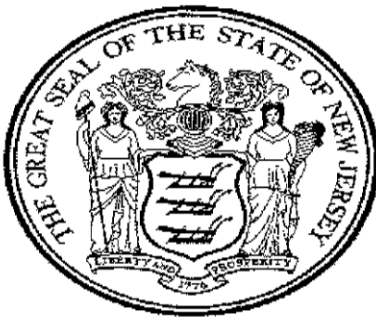
Jan 23 2013 02:27pm P002/002

STATE OF NEW JERSEY  
DEPARTMENT OF TREASURY  
CERTIFICATE OF REINSTATEMENT - ANNUAL REPORTS

ABSOLUTE COMPUTER TECHNOLOGIES, INC.  
0100305142

A DOMESTIC PROFIT CORPORATION

*WHEREAS the above-named business entity did on the 23rd day of January, 2013, satisfy all requirements for reinstatement as set forth in the laws of this State, I, the Treasurer of the State of New Jersey do hereby issue this certificate authorizing the same to continue its business and resume the exercise of its functions.*



IN TESTIMONY WHEREOF, I have  
hereunto set my hand and  
affixed my Official Seal  
at Trenton, this  
23rd day of January, 2013

Andrew P Sidamon-Eristoff  
State Treasurer

Certificate Number: 127204251

Verify this certificate online at

[https://www1.state.nj.us/TYTR\\_StandingCert/JSP/Verify\\_Cert.jsp](https://www1.state.nj.us/TYTR_StandingCert/JSP/Verify_Cert.jsp)



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Absolute Computer Technologies, Inc.

ACT Request Reconsideration of Loan Application  
SANDY #4021 Business Loan Application:  
SBA Reference Number: # 1000219393  
Page 26 of 28

## ATTACHMENT VIII Notified Federal Authorities of Identity Fraud

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence - NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

---

May 22, 2012

Mr. Douglas Shulman  
Commissioner  
Internal Revenue Service  
1111 Constitution Ave., N.W.  
Washington, DC 20224

Mr. John Berry  
Director  
United States Office of Personnel Management  
1900 E Street, NW  
Washington, DC 20415

Subject: Identity Theft of Veronica Williams ✦ April 19, 2012 ✦ SSN 579-74-4037

Sent via email to John Berry, Dorothy Becones (for D. Shulman)

Dear Mr. Shulman & Mr. Berry,

I have just learned that I was the victim of identity theft and need your intervention to resolve the problem.

I have no doubt that my identity was recently stolen by one or more persons who had access to recent tax returns filed or Federal job applications. There has been little or no opportunity to access the information stolen through other means.

I have the knowledge and credentials to explain why and provide validation. **You must act right now.** This person or group has recently received or is waiting for stolen Federal funds. I also trust you will use my case to track and stop these and other identity thieves.

I will respond to a single person whom I can validate and is assigned to my case. I will release my social security number, IRS Form 14039 and other personal information required to that person. I can be reached by phone at 202-486-4565 or via email at [VWtemp@OfficeThatWorks.com](mailto:VWtemp@OfficeThatWorks.com). I shall await contact from your office.

Thank you in advance,

*Veronica Williams*

Veronica Williams

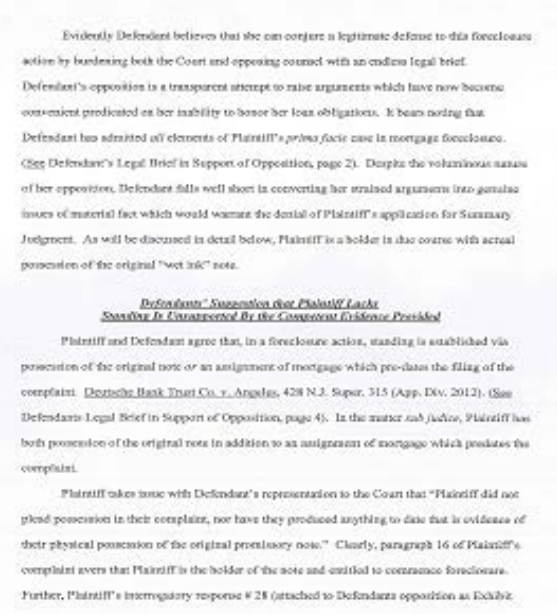
## ATTACHMENT IX

### Character Assassination is Dominant Strategy of Defendants' Attorneys Plaintiff's Is Of Strong Character and Has Been Vetted Extensively

Veronica A. Williams, Plaintiff and an upstanding member of the community, has been maligned and disrespected by Defendants' Attorneys. We have not yet completed our review of disparaging remarks against the Plaintiff. Many documents have been filed by at least 6 law firms since 2009. For a complete list of firms click here XXX. Recent documents that unfairly demean the Plaintiff include:

#### **Disrespected & Character Assassination by Defendants' Attorneys**

**While there was multiple disparaging correspondence, one of the most offensive & insulting is:**



1/29/14 CharacterAssasin\_Williams-Lambropoulos-PL Memo-inResp-to-Def-Opp-to-PL-MSJ.pdf [To View Full Doc Click Here](#)

#### **OTHER INSULTING CORRESPONDENCE**

10/30/13 CharacterAssasin\_To-O'Donnell-Response-to-Friv-Lit.pdf [To View Doc Click Here](#)

11/18/13 CharacterAssasin\_From-Lambropoulos-SE-Reply-in-Further-Supp-M-to-Dismiss.pdf [To View Doc Click Here](#)

12/11/13 CharacterAssasin\_PI-MSJ-w-out-Exhibits.pdf [To View Doc Click Here](#)

**Ironically, the defendants – financial firms– have retained legal counsel that do not display a sound understanding of finance.**

**Williams' commendations continue. Most recently, Williams has been recognized by:**

FINRA and The HL Carey Center at St. John University's Law School [click here](#)

The Financial Industry Regulatory Authority (FINRA) and The Hugh L. Carey Center for Dispute Resolution

Molson MBA International Case Competition [click here](#)

Marquis' Who's Who in the World [click here](#) & Who's Who in America [click here](#)

Williams:"I have always carried myself and taken great pride in having the upmost integrity. While I can cite numerous examples of being vetted and recognized for my character and honor, here are just a few":

ORGANIZATION & POSITION	DESCRIPTION	DATE
<a href="#">FINRA</a> Arbitrator	Successfully underwent extensive review, evaluation and investigation to become an arbitrator for the Financial Industry Regulatory Authority.	Since 2009
<a href="#">Women Who</a>	Acclaimed panel and their supporting team scrutinized leading business women	1999



ORGANIZATION & POSITION	DESCRIPTION	DATE
<a href="#">Mean Business</a>	in the US and Canada. <a href="#">I was one of the 75 selected &amp; featured in this book.</a>	
Member of Microslate Board of Directors	I was the focus of an extensive and thorough investigation by this renown international manufacturing firm. I was the only foreigner, woman and minority voted in as a member of their Board of Directors. Our Board oversaw a major acquisition and also chaired the compensation committee.	1998 – 2003 est.
COMDEX Board of Advisors COMDEX Media Board	I was selected and <a href="#">provided advisory services to the largest commercial IT event company</a> for more than 5 years. A sitting US President attended the pavilion I created, orchestrated and led. This meant passing a Secret Service review. I also made several media appearances on their behalf.	1994-2002
US Public Trust	I held a US Public Trust (consulted to the National Archives) and passed two investigations by the US Dept. Homeland Security to attend confidential, private briefings. I also was cleared to review strategic information and deliver strategic and custom designed solutions for the US Army with admittance to multiple military bases. <b><i>I was in the final stage to receive a US Security Clearance until Goldman Sachs and Litton Loan defrauded me, an action condoned by HSBC in writing.</i></b>	2008
US Department of Defense (DoD)	Recommended by the DoD – OSD – I served as an early contributor to GIG development process as member of DoD Industry Council supported by NDIA/AFEI, DISA and major Federal contractors. With a reputation of high integrity, my company was the only small firm without a DoD task Order invited to attend.	2003 – 2008 est.
Marquis Who's Who	<a href="#">Recognized since 1988 in over 38 publications.</a> Since Marquis Who's Who® is the premier publisher of biographical information used by thousands of public, academic and corporate libraries around the world. <a href="#">Marquis' Who's Who in America®</a> has remained the definitive biographical reference work since 1899, chronicling the lives and accomplishments of men and women in every field of endeavor. Marquis Who's Who LLC is a wholly owned subsidiary of News Communications, Inc, which also owns The Hill and National Register Publishing. For more information, please visit <a href="http://www.marquiswhoswho.com">www.marquiswhoswho.com</a>	1994 to current
<a href="#">PMI</a> PgMP credential holder	Successfully completed extensive and thorough evaluation and review to earn the <a href="#">PgMP credential</a> , held by less than 1,000 worldwide. <a href="#">Continues to comply with expertise and ethics standards to maintain credential.</a>	2009
Rotary International	I served as a two-term President of the Orange Rotary. Rotary International brings together a global network of volunteer leaders dedicated to tackling the world's most pressing humanitarian challenges. Rotary connects 1.2 million members of more than 34,000 Rotary clubs in over 200 countries and geographical areas. Their work improves lives at both the local and international levels, from helping families in need in their own communities to working toward a polio-free world. For more information, visit <a href="http://Rotary.org">Rotary.org</a> .	2004-06
Recommendations and Commendations	I have received countless recommendations over the years for my contributions and accomplishments. Many can be found online at <a href="http://www.VeronicaWilliams.com">www.VeronicaWilliams.com</a> , <a href="#">LinkedIn</a> and <a href="http://www.the5ps.com/Brand">http://www.the5ps.com/Brand</a> . Many written letters are available including letters from fellow arbitrators.	Lifetime

Additional validation may be found at [www.VeronicaWilliams.com](http://www.VeronicaWilliams.com).

## DENIAL LETTERS FRM SBA

### PLAINTIFF RESPONDED WITH:

There is a misunderstanding. Your denial letters state:

#### **IRENE**

RE: Reacceptance of Case File 1000115934

As we stated in our letter April 18, 2012, the 90 day deadline to request reconsideration of your disaster loan application expired on July 18, 2012. By regulation, we are permitted to accept reacceptance requests after the expiration of the filing deadline only when we are able to establish that the late request resulted from substantial causes essentially beyond the control of the applicant.

#### **SANDY**

RE: Reacceptance of Case File 1000219393

As we stated in our letter September 3, 2013, the 90 day deadline to request reconsideration of your disaster loan application expired on December 3, 2013. By regulation, we are permitted to accept reacceptance requests after the expiration of the filing deadline only when we are able to establish that the late request resulted from substantial causes essentially beyond the control of the applicant.

**I do not understand;** the appeal clearly demonstrates that my case meets the regulation guidelines to accept reacceptance requests after the expiration of the filing deadline. The documentation provided clearly shows that “the late request resulted from substantial causes essentially beyond the control of the applicant”. The IRS agreed and waived our fees. The Discovery document and Motion for Proof Hearing also clearly show that fraud by the defendants prevented me proceeding with an offer from FEMA.

I realize the information submitted is quite extensive. May I review it with you to help point you to the many instances presented in which our appeal meets regulatory requirements for reacceptance?

Veronica

[Veronica Williams](#)

**WAITING FOR RESPONSE**





## U. S. Small Business Administration

Disaster Assistance  
Processing and Disbursement Center  
14925 Kingsport Road  
Fort Worth, Texas 76155

(817) 868-2300  
1 (800) 366-6303  
Hearing Impaired  
(817) 267-4688

February 3, 2015

Absolute Computer Technologies, Inc.  
Veronica A. Williams, President  
541 Scotland Road  
South Orange, NJ 07079

**SCANNED**

FEB 04 2015

*DS/ASD*

RE: Reacceptance of Case File 1000115934

Dear Ms. Williams:

The U.S. Small Business Administration has received your letter dated January 28, 2015 requesting reconsideration of your disaster loan applications. Unfortunately, we are unable to grant your request.

As we stated in our letter April 18, 2012, the 90 day deadline to request reconsideration of your disaster loan application expired on July 18, 2012. By regulation, we are permitted to accept reacceptance requests after the expiration of the filing deadline only when we are able to establish that the late request resulted from substantial causes essentially beyond the control of the applicant.

Based upon the explanation cited in your letter, your request has failed to evidence substantial causes beyond your control that prevented you from meeting the deadline to request reacceptance.

We regret our inability to assist you in this matter.

Sincerely,

Jerry Williamson  
Supervisory Loan Officer



## U. S. Small Business Administration

Disaster Assistance  
Processing and Disbursement Center  
14925 Kingsport Road  
Fort Worth, Texas 76155

(817) 868-2300  
1 (800) 366-6303  
Hearing Impaired  
(817) 267-4688

February 3, 2015

Absolute Computer Technologies, Inc.  
Veronica A. Williams, President  
P.O. Box 978  
South Orange, NJ 07079

**SCANNED**  
FEB 04 2015

RE: Reacceptance of Case File 1000219393

Dear Ms. Williams:

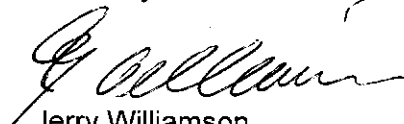
The U.S. Small Business Administration has received your letter dated January 28, 2015 requesting reconsideration of your disaster loan applications. Unfortunately, we are unable to grant your request.

As we stated in our letter September 3, 2013, the 90 day deadline to request reconsideration of your disaster loan application expired on December 3, 2013. By regulation, we are permitted to accept reacceptance requests after the expiration of the filing deadline only when we are able to establish that the late request resulted from substantial causes essentially beyond the control of the applicant.

Based upon the explanation cited in your letter, your request has failed to evidence substantial causes beyond your control that prevented you from meeting the deadline to request reacceptance.

We regret our inability to assist you in this matter.

Sincerely,

  
Jerry Williamson  
Supervisory Loan Officer

**EXHIBIT E**

**WITNESSES**

(This list is Exhibit 7: [WITNESSES](#) from the Discovery document)

For the full list [Click Here](#)

**Testimony from doctors and other healthcare professionals about hospitalizations, therapy, treatments and medications endured by Plaintiff for stress related illness induced and exacerbated by defendants.**

**Witnesses also include former employees and affiliates of Defendants, clients and colleagues of Plaintiff, and others knowledgeable of damages to Plaintiff imposed or caused by defendants.**

**Since some of our current and intended witnesses have been intimidated by people working on behalf of the Defendants, the names of those chosen to testify will not be revealed until the day of testimony.**

**EXHIBIT E**

**WITNESSES**

(This list is Exhibit 7: [WITNESSES](#) from the Discovery document)

For the full list [Click Here](#)

**Testimony from doctors and other healthcare professionals about hospitalizations, therapy, treatments and medications endured by Plaintiff for stress related illness induced and exacerbated by defendants.**

**Witnesses also include former employees and affiliates of Defendants, clients and colleagues of Plaintiff, and others knowledgeable of damages to Plaintiff imposed or caused by defendants.**

**Since some of our current and intended witnesses have been intimidated by people working on behalf of the Defendants, the names of those chosen to testify will not be revealed until the day of testimony.**

## WITNESSES

We have identified 838 witnesses so far who fit into 6 categories:

- └─ Litton-Goldman-Case-Contacts
  - └─ Character Witnesses
  - └─ Defendant Witnesses
  - └─ Doctors to Witness
  - └─ Federal Witnesses
  - └─ Financial Witnesses
  - └─ Fremont Witnesses

Details will be released on a need-to-know basis only.

Some of our witnesses have volunteered to testify, many have agreed to testify, and some have not yet been contacted. All know the plaintiff, have done business with her firm, or are aware of business practices of the defendants. A few former and current employees, and affiliates, of the defendants, may be subpoenaed. The following pages include two lists: primary witnesses and all witnesses.

For the privacy of all witnesses, this list is only being provided to the Superior Court of Essex County in the State of New Jersey, and to Stuart I. Seiden of Duane Morris, the attorney who now represents all defendants.

**PRIMARY WITNESSES**

<b>Company</b>	<b>Contact</b>
	Krista Franks Brock
	Alan Dombrow
ACT inc	George Pappas
AHEAD Inc.	Irving C. Williams, Sr., MD
American Modern Home Insurance Company	Greg Brigner
American Modern Home Insurance Company	Manuel Z. Rios
American Modern Home Insurance Company	Latonya Willis
EndPoint Consulting Group, LLC	Roosevelt Giles
Evangelical Christian Credit Union	Mike Koch
former Litton Loan employee	Bessie Cahee
former Litton Loan employee	Randy Reynolds
GreenPath	Lisa Ferri
GreenPath	Jane E. McNamara
GSA - U.S. General Services Administration	Cathy Boyer
GSA - U.S. General Services Administration	Mike Canan
GSA - U.S. General Services Administration	Andrew Cid
GSA - U.S. General Services Administration	Debra Coley
GSA - U.S. General Services Administration	David T. Collins
GSA - U.S. General Services Administration	Steven A. Connolly
GSA - U.S. General Services Administration	Trilma Davis
GSA - U.S. General Services Administration	Maureen Duckworth
GSA - U.S. General Services Administration	Tony Fabrizio, CQA
GSA - U.S. General Services Administration	Georgina Fernando
GSA - U.S. General Services Administration	Sharon Flannery
GSA - U.S. General Services Administration	Mitzi Ford
GSA - U.S. General Services Administration	Deborah Gamble
GSA - U.S. General Services Administration	Thad Gassman
GSA - U.S. General Services Administration	Millicent Hawkins
GSA - U.S. General Services Administration	Warren N. Hayashi
GSA - U.S. General Services Administration	Dale Henderson
GSA - U.S. General Services Administration	Antoinette Huff
GSA - U.S. General Services Administration	Charlotte Jennings
GSA - U.S. General Services Administration	Shaunta P. Johnson
GSA - U.S. General Services Administration	Tammy M. Lindsley
GSA - U.S. General Services Administration	Terry McNair
GSA - U.S. General Services Administration	Jennifer Mitchell Goss
GSA - U.S. General Services Administration	Mary E. Mitton
GSA - U.S. General Services Administration	Corey Nickens
GSA - U.S. General Services Administration	Colleen Pappas
GSA - U.S. General Services Administration	Donna Rivers
GSA - U.S. General Services Administration	Dillan R. Sheppard
GSA - U.S. General Services Administration	Stephanie Turner
Harris Corporation	Vladimir Kowaliwskyj



<b>Company</b>	<b>Contact</b>
IBM	Elizabeth H. Bryant
Ironbound Community Corporation	Diego Arias
Ironbound Community Corporation	Brandy Hannah Barnes
Johnson Controls World Services, Inc.	Reginald Layton
Lockheed Martin IMS	Joseph D. Segrest
Lockheed Martin IMS	Thomas W. Tremper
NJIT Defense Procurement Tech. Assistance Ctr.	Bob Brown
Ocwen Financial Corporation	Kevin Flanagan
Ocwen Financial Corporation	Tiffany
Schepisi & McLaughlin	John A. Schepisi Esq.
Sclar Adler LLP	Samuel Bergman
Shulman Wellness Center LLC	Jeffrey S. Shulman D.C.
signed for Litton Loan payments	Roy Hughes
	George Pappas
The Ravens Group Inc.	Joe N. Ballard
United States Department of Agriculture	Don Arnette
United States Department of Agriculture	Jackie Lee
United States Department of Agriculture	Kim M. Lepore
United States Department of Agriculture	Patricia Palmer
United States Department of Agriculture	Lisa Wilusz
United States Department of Defense	Victor Ciardello
United States Department of Defense	Oscar Eichorn
United States Department of Defense	Yvonne Hartwell
United States Department of Defense	Maria Hayes
United States Department of Defense	Michael Krieger
United States Department of Defense	Pamela Monroe
United States Department of Defense	Michael Todd
United States Department of Homeland Security	Lattia Baker
United States Department of Homeland Security	Alan Barclay
United States Department of Homeland Security	Anthony Bell
United States Department of Homeland Security	Joseph A. Capuano, Jr.
United States Department of Homeland Security	Jeannie Coratobo
United States Department of Homeland Security	Wanda Cortesini
United States Department of Homeland Security	Quyen Diep
United States Department of Homeland Security	Mui Erkun
United States Department of Homeland Security	Diane Furr
United States Department of Homeland Security	Kyle B. Groome
United States Department of Homeland Security	Marvin Grubbs
United States Department of Homeland Security	Cassandra James-Cole
United States Department of Homeland Security	J. Paul Johnson, CHS-III, CAPM
United States Department of Homeland Security	Faye Jones
United States Department of Homeland Security	Ramona Jones
United States Department of Homeland Security	Karen McElheney
United States Department of Homeland Security	Susan Moroni
United States Department of Homeland Security	Daniel F. Sturdivant II
United States Department of Homeland Security	William J. Thoreen

<b>Company</b>	<b>Contact</b>
United States Department of Homeland Security	Debra Trott
United States Department of Homeland Security	Barbara Veres
United States Department of Homeland Security	Patricia Wyatt
United States Department of Housing & Urban Development	Valerie Hayes
United States Department of Housing & Urban Development	Ozema "Ozzie" Moore
United States Department of the Army	Richard Burdett
United States Department of the Army	Paul L. Gardner
United States Department of the Army	Cheryl Hall
United States Department of the Army	Kevin R. Loesch
United States Department of the Army	Jan Luce
United States Department of the Army	Tracey Pinson
United States Department of the Army	Joe Shipposh
United States Department of the Army	Linda Wright
United States Department of the Interior	Robert W. Faithful IV
United States Department of the Interior	Sharon McDowell
United States Department of the Navy	Glenn Delgado
United States Department of the Navy	Nicole Denofa
United States Department of Transportation	Dennis Filler
United States General Services Administration	Joan Parrott-Fonseca
United States Securities and Exchange Commission	Bonnie Kartzman
United States Securities and Exchange Commission	Kenneth Lynch
United States Securities and Exchange Commission	Jeffery L. Oval
United States Securities and Exchange Commission	Lorin Reisner
United States Securities and Exchange Commission	Ollie R. Wade
US Family Health Plan	Fred Concepcion
World Information Technology Solutions, LLC	Dudley Allen
World Information Technology Solutions, LLC	Paul Secrest

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**ALL WITNESSES**

Company	Contact
	Krista Franks Brock
	Alan Dombrow
	Richard J. Dunn
	Larry Litton, Sr.
	Larry B Litton Jr.
	Malcolm Parvey
ACT inc	George Pappas
AHEAD Inc.	Irving C. Williams, Sr., MD
American Modern Home Insurance Company	Greg Brigner
American Modern Home Insurance Company	Manuel Z. Rios
American Modern Home Insurance Company	Latonya Willis
Association For Enterprise Integration - AFEI	Betsy Lauer
B2B Data Source, Inc.	Audrey Ray
B2Gsource, Inc.	Paul J. Park
BAE Systems	Bill Reuter
Booz Allen Hamilton Inc.	Jan J. Gardill
Booz Allen Hamilton Inc.	Lawrence LaValle
Brookwood Media Arts	Jacqueline Beck
CACI International, Inc.	Thomas Reed Jr.
Catholic Charities	Emma Papiol
CMP Media Inc.	Simon Cooper
Culbreath Consulting Corp	Terri Randolph
Dell Computer Corporation	Chad Rives
DESE Research, Inc.	Paul R. Logan
Dimensions International	Jo Sanders
E.F. Johnson	Elizabeth Cram
E.F. Johnson	Electra Kreis
E.F. Johnson	Laurie Schweer
Economic Damage Advisory Services, LLC	Douglas H. Sell, Jr., CFE
EndPoint Consulting Group, LLC	Roosevelt Giles
Engineered Systems, Inc.	Duane Dana
Engineered Systems, Inc.	David Gilfillan
Engineering Solutions and Products, Inc.	Charles Patterson
Enhance Financial Services Group, Inc.	Daniel J. Gross
Environmental Network International, Inc.	Kim Winslow
eSGS	Yvette M. Carey
Evangelical Christian Credit Union	Mike Koch
FedBizOpps.gov	George Tracy
FindRFP - JXE Inc.	Jeff Xie
former Litton Loan employee	Bessie Cahee
former Litton Loan employee	Randy Reynolds
Fremont	Wayne Bailey
Fremont	Alan W. Faigin

<b>Company</b>	<b>Contact</b>
Fremont	Marion R. Ferla
Fremont	Elizabeth Hilton
Fremont	Patrick E. Lamb
Fremont	James Albert McIntyre
Fremont	Raymond Meyers
Fremont	Mary-Lou A. Misrahy
Fremont	Raymond Myers
Fremont	W. Brian O'Hara
Fremont	Richard C. Pugh, Jr.
Fremont	Louis J. Rampino
Fremont	Allyson B. Simpson
Fremont Investment & Loan	Customer Service
GAP SOLUTIONS	Tommy Thomas
General Dynamics	Edward L. Carnes
Goldman Sachs & Company	Lloyd Blankfein
GreenPath	Lisa Ferri
GreenPath	Jane E. McNamara
GSA - U.S. General Services Administration	
GSA - U.S. General Services Administration	David Abraham
GSA - U.S. General Services Administration	Victor Angkico
GSA - U.S. General Services Administration	Carla Ansley
GSA - U.S. General Services Administration	Richard Apple
GSA - U.S. General Services Administration	Tonia Arnold
GSA - U.S. General Services Administration	Brian Asp
GSA - U.S. General Services Administration	Robert Back
GSA - U.S. General Services Administration	Kelly P. Bailey
GSA - U.S. General Services Administration	Wilma Bailey
GSA - U.S. General Services Administration	Scott Banhart
GSA - U.S. General Services Administration	Brandi Barnes
GSA - U.S. General Services Administration	Sabrina Bass
GSA - U.S. General Services Administration	Cathy Beasley
GSA - U.S. General Services Administration	Elizabeth Bigger
GSA - U.S. General Services Administration	Sharon Blair
GSA - U.S. General Services Administration	Claude Bowlding
GSA - U.S. General Services Administration	Cathy Boyer
GSA - U.S. General Services Administration	Janice Bracey
GSA - U.S. General Services Administration	Will Brimberry
GSA - U.S. General Services Administration	Durrell Briskey
GSA - U.S. General Services Administration	Hope Brown
GSA - U.S. General Services Administration	Sheila Bumpers
GSA - U.S. General Services Administration	Candelle Campbell
GSA - U.S. General Services Administration	Mike Canan
GSA - U.S. General Services Administration	Ralph Cervantes
GSA - U.S. General Services Administration	Christine Chaapel
GSA - U.S. General Services Administration	Andrew Cid
GSA - U.S. General Services Administration	Josh Clemens

<b>Company</b>	<b>Contact</b>
GSA - U.S. General Services Administration	Keonia Cobbins
GSA - U.S. General Services Administration	Debra Coley
GSA - U.S. General Services Administration	David T. Collins
GSA - U.S. General Services Administration	Steven A. Connolly
GSA - U.S. General Services Administration	Angela Cortez-Gonzales
GSA - U.S. General Services Administration	Glenn Cruz
GSA - U.S. General Services Administration	Jayne Cucetta
GSA - U.S. General Services Administration	Trilma Davis
GSA - U.S. General Services Administration	Carolyn Day Hecox
GSA - U.S. General Services Administration	Peter Dennihy
GSA - U.S. General Services Administration	Lurita A. Doan
GSA - U.S. General Services Administration	Debra Dorsey
GSA - U.S. General Services Administration	Maureen Duckworth
GSA - U.S. General Services Administration	Cindy Duncan
GSA - U.S. General Services Administration	Cecil Dyer
GSA - U.S. General Services Administration	Joe Eason
GSA - U.S. General Services Administration	Kristen Eaves
GSA - U.S. General Services Administration	Kisha Emmanuel
GSA - U.S. General Services Administration	Carol England
GSA - U.S. General Services Administration	Tony Fabrizio, CQA
GSA - U.S. General Services Administration	Jon Faye
GSA - U.S. General Services Administration	Janelle Feltman
GSA - U.S. General Services Administration	Georgina Fernando
GSA - U.S. General Services Administration	Edward Feuer
GSA - U.S. General Services Administration	Eileen Flanigan
GSA - U.S. General Services Administration	Sharon Flannery
GSA - U.S. General Services Administration	Mitzi Ford
GSA - U.S. General Services Administration	Prudence Francis
GSA - U.S. General Services Administration	Marvin Frasier
GSA - U.S. General Services Administration	Zoe-Ann Freitag
GSA - U.S. General Services Administration	Patrick Galamay
GSA - U.S. General Services Administration	Deborah Gamble
GSA - U.S. General Services Administration	Thad Gassman
GSA - U.S. General Services Administration	Arlene Glenn
GSA - U.S. General Services Administration	Shirlene Green
GSA - U.S. General Services Administration	Laura Gribble
GSA - U.S. General Services Administration	Joyce Grudzinski
GSA - U.S. General Services Administration	Frederick Hardgrove
GSA - U.S. General Services Administration	Lee Hardwick
GSA - U.S. General Services Administration	Frederick Hargrove
GSA - U.S. General Services Administration	Von Harrison
GSA - U.S. General Services Administration	Millicent Hawkins
GSA - U.S. General Services Administration	Warren N. Hayashi
GSA - U.S. General Services Administration	Dale Henderson
GSA - U.S. General Services Administration	Catherine Holland
GSA - U.S. General Services Administration	Tom Howder

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GSA - U.S. General Services Administration	Antoinette Huff
GSA - U.S. General Services Administration	Steven Hull
GSA - U.S. General Services Administration	Kay Hurley
GSA - U.S. General Services Administration	Howard Innis
GSA - U.S. General Services Administration	Candace M. Jackson
GSA - U.S. General Services Administration	Michael Jackson
GSA - U.S. General Services Administration	Adamo James
GSA - U.S. General Services Administration	Helen Jay
GSA - U.S. General Services Administration	Charlotte Jennings
GSA - U.S. General Services Administration	John C. Johnson
GSA - U.S. General Services Administration	Shaunta P. Johnson
GSA - U.S. General Services Administration	Tim Johnson
GSA - U.S. General Services Administration	David Kadish
GSA - U.S. General Services Administration	Marydel Kemp
GSA - U.S. General Services Administration	Bonita Kenan
GSA - U.S. General Services Administration	Karen LaBoon
GSA - U.S. General Services Administration	Linda Langston
GSA - U.S. General Services Administration	Kristine Levine
GSA - U.S. General Services Administration	William Lewis
GSA - U.S. General Services Administration	Jeannie Li
GSA - U.S. General Services Administration	James Lilac
GSA - U.S. General Services Administration	Tammy M. Lindsley
GSA - U.S. General Services Administration	Mona Lisa Dunn
GSA - U.S. General Services Administration	Jerome Lofton
GSA - U.S. General Services Administration	Michael Lopez
GSA - U.S. General Services Administration	Edward Masalik
GSA - U.S. General Services Administration	Nicole Mc Gee
GSA - U.S. General Services Administration	Rita McCue
GSA - U.S. General Services Administration	Kimberly L. McFall
GSA - U.S. General Services Administration	Nicole McGee
GSA - U.S. General Services Administration	Terry McNair
GSA - U.S. General Services Administration	Felipe Mendoza
GSA - U.S. General Services Administration	Emory Miller
GSA - U.S. General Services Administration	Eddie Mills
GSA - U.S. General Services Administration	Pacita P. Mina
GSA - U.S. General Services Administration	Ron Missiddine
GSA - U.S. General Services Administration	Jennifer Mitchell Goss
GSA - U.S. General Services Administration	Mary E. Mitton
GSA - U.S. General Services Administration	Ron Mock
GSA - U.S. General Services Administration	Angela Morris
GSA - U.S. General Services Administration	Corey Nickens
GSA - U.S. General Services Administration	Catherine Njiru
GSA - U.S. General Services Administration	Frank Nolan
GSA - U.S. General Services Administration	Wanda Nolan
GSA - U.S. General Services Administration	Teri Osabutey
GSA - U.S. General Services Administration	Terry Oyama



<b>Company</b>	<b>Contact</b>
GSA - U.S. General Services Administration	Jean Oyler
GSA - U.S. General Services Administration	Richard Pakerson
GSA - U.S. General Services Administration	Colleen Pappas
GSA - U.S. General Services Administration	Richard Parkerson
GSA - U.S. General Services Administration	Narthaniel J. Pittman
GSA - U.S. General Services Administration	Staci Plymale
GSA - U.S. General Services Administration	Linda Powers
GSA - U.S. General Services Administration	George Privon
GSA - U.S. General Services Administration	Michael Rice
GSA - U.S. General Services Administration	Todd Richards
GSA - U.S. General Services Administration	Arlene Rieara
GSA - U.S. General Services Administration	Donna Rivers
GSA - U.S. General Services Administration	Michelle Rogers
GSA - U.S. General Services Administration	Zalma Ross
GSA - U.S. General Services Administration	Bill Russell
GSA - U.S. General Services Administration	Rita Samuel
GSA - U.S. General Services Administration	Mark Schimmelbusch
GSA - U.S. General Services Administration	Yvonne Scott-Shider
GSA - U.S. General Services Administration	Mary Searcy
GSA - U.S. General Services Administration	Richard Shelton
GSA - U.S. General Services Administration	Dillan R. Sheppard
GSA - U.S. General Services Administration	Bernardine Smalls
GSA - U.S. General Services Administration	Pat Smith
GSA - U.S. General Services Administration	Vanessa Smith
GSA - U.S. General Services Administration	Ruth E. Starr
GSA - U.S. General Services Administration	Mary Stedman
GSA - U.S. General Services Administration	Cheryll Sundberg
GSA - U.S. General Services Administration	Technical Support
GSA - U.S. General Services Administration	Beverly Suzuki
GSA - U.S. General Services Administration	David Temoshok
GSA - U.S. General Services Administration	Mark Terzano
GSA - U.S. General Services Administration	June Thomas
GSA - U.S. General Services Administration	Robert Thompson
GSA - U.S. General Services Administration	Jessica Tuggle
GSA - U.S. General Services Administration	Stephanie Turner
GSA - U.S. General Services Administration	JOHNNY VANCE
GSA - U.S. General Services Administration	Daniel Vidal
GSA - U.S. General Services Administration	Debra Wells
GSA - U.S. General Services Administration	Spring Wells
GSA - U.S. General Services Administration	Kelley West
GSA - U.S. General Services Administration	Julia E. Whitmore-Sevin
GSA - U.S. General Services Administration	Corrinne Williams
GSA - U.S. General Services Administration	Desiree Williams
GSA - U.S. General Services Administration	Theresa Williams
GSA - U.S. General Services Administration	Gary Winters
GSA - U.S. General Services Administration	Vernessa Younger

<b>Company</b>	<b>Contact</b>
GSA - U.S. General Services Administration	Tony Zaza
GSA - U.S. General Services Administration	Dale Zimmerman
GSA Awards, Inc.	Scott Sekerak
GSA BIZ Opps, Inc.	Kathy Henson
GSA Proposal	Chris
Harris Corporation	Vladimir Kowaliwskyj
Hewlett-Packard Development Company, L.P.	Bill Collins
IBM	Elizabeth H. Bryant
IBM	Rob Moser
Ironbound Community Corporation	Diego Arias
Ironbound Community Corporation	Brandy Hannah Barnes
Ironbound Community Corporation	Reina Esteras
Johnson Controls World Services, Inc.	Reginald Layton
Johnson Controls World Services, Inc.	Kelly O'Malley
Kaiser Permanente	Juan Carillo
Lockheed Martin	David Randell
Lockheed Martin IMS	Joseph D. Segrest
Lockheed Martin IMS	Thomas W. Tremper
M/A-COM Private Radio Systems (PRS)	Chris Fauser
M/A-COM Private Radio Systems (PRS)	Kevin Fleming
M/A-COM, Inc.	Steve Hurwitz
M/A-COM, Inc.	Noreen Kealey
Motorola, Inc.	Joe Cecere
Motorola, Inc.	Joe Fricano
Motorola, Inc.	Christina Werther
n/Frame	Kenneth Miller
National Indian Gaming Commission	Norman H. DesRosiers
National Science Foundation	Rita R. Colwell
NCI Information Systems, Inc.	Terry Glasgow
NCI Information Systems, Inc.	Clarence J. Johnson
NCI Information Systems, Inc.	Charles K. Narang
New American Funding	Daniel R. Nunez
New Jersey Legislature	Harriett Farber Klein
NJIT Defense Procurement Tech. Assistance Ctr.	Bob Brown
Northrop Grumman Corporation	Ronald D. Sugar
Ocwen Financial Corporation	William Erby
Ocwen Financial Corporation	Kevin Flanagan
Ocwen Financial Corporation	Tiffany
Opus Capital Markets Consultants	Ben Jonas
QSS Group, Inc.	Frank Islam
Radian Group Inc.	S.A. Ibrahim
Raytheon	John Kleinfelter
RGF Consulting Corporation	Robert G. Flowers, Jr., Lt Col.
Rockwell Collins	Pat Thornton
Rutgers University	Lesley R. Brown

<b>Company</b>	<b>Contact</b>
Rutgers University	Cindy Johnson
Rutgers University	Reina M. Schuman
Salvation Army	Anna Marie Goglia
Salvation Army	Matt Hodgson
SBA - U.S. Small Business Administration	Diane Butler
SBA - U.S. Small Business Administration	Billy Jenkins
SBA - U.S. Small Business Administration	Deborah Woods
Schepisi & McLaughlin	John A. Schepisi Esq.
Sclar Adler LLP	Samuel Bergman
ShoWorks, Inc.	Cathy Doerr
Shulman Wellness Center LLC	Jeffrey S. Shulman D.C.
Sicommnet	Michael T. Elliott
signed for Litton Loan payments	Roy Hughes
St. Barnabas Medical Center	
State of Maryland	Zena Morris
State of New Jersey Department of Banking and Insurance	Kenneth Kobylowski
State of New Jersey Department of Community Affairs	Sally Poulshock
State of New Jersey Department of Corrections	Lou Mancuso
State of New Jersey Department of State	Richard Allen
State of New Jersey Legislature	Harriett Farber Klein
State of New Jersey Legislature	William Narvaez
State of New Jersey Legislature	James S. Rothschild
State of New Jersey Legislature	Philip Thigpen
State of New Jersey Office of Information Technology	Elizabeth Caldwell
State of New Jersey Office of Information Technology	Ken Garrett
State of New Jersey Office of Information Technology	Tom Pierson
State of New Jersey Office of Information Technology	Anna Domurat Thomas
Stern & Eisenberg, PC	David M. Lambropoulos
The Capital Group Companies, Inc.	Andrew Francis Barth
The Capital Group Companies, Inc.	Larry P. Clemmensen
The Capital Group Companies, Inc.	Eugene P. Stein
The Lone Ranger, LLC	George Pappas
The Ravens Group Inc.	Joe N. Ballard
Titan Corporation	Joseph Leadley
United States Consumer Financial Protection Bureau	Richard Cordray
United States Consumer Financial Protection Bureau	Jean Healey
United States Department of Agriculture	Brenda Anderson
United States Department of Agriculture	Don Arnette
United States Department of Agriculture	Karen Chapman
United States Department of Agriculture	Dave Combs
United States Department of Agriculture	Heather Curlett
United States Department of Agriculture	Angela Drudik
United States Department of Agriculture	Theresa Edwards
United States Department of Agriculture	Fred Gifford
United States Department of Agriculture	Enrique Gomez

<b>Company</b>	<b>Contact</b>
United States Department of Agriculture	Joanne Guthrie
United States Department of Agriculture	Gayle Harris
United States Department of Agriculture	Zahra Hashmi
United States Department of Agriculture	James House
United States Department of Agriculture	Alonzo Jacobs
United States Department of Agriculture	Douglas Joyner
United States Department of Agriculture	Jackie Lee
United States Department of Agriculture	Kim M. Lepore
United States Department of Agriculture	Gary Lucier
United States Department of Agriculture	Joseph McCall
United States Department of Agriculture	Melinda L. McClanahan
United States Department of Agriculture	Larry Nelson
United States Department of Agriculture	Tina Nevitt
United States Department of Agriculture	Doug Page
United States Department of Agriculture	Patricia Palmer
United States Department of Agriculture	Judy Pepperdine
United States Department of Agriculture	Roberto Salazar
United States Department of Agriculture	Debbie Sanders
United States Department of Agriculture	Karen Scott
United States Department of Agriculture	Greg Wilson
United States Department of Agriculture	Lisa Wilusz
United States Department of Commerce	
United States Department of Commerce	Barbara Guise
United States Department of Commerce	Ronald N. Langston
United States Department of Commerce	Sal Lauricella
United States Department of Commerce	Joel Perlroth
United States Department of Defense	Melissa Adams
United States Department of Defense	Thomas W. Ainsworth
United States Department of Defense	SVETLANA ALLENDORF
United States Department of Defense	Marina Atchison
United States Department of Defense	Regina Bacon
United States Department of Defense	Carolyn Baltimore
United States Department of Defense	Otis Boggs
United States Department of Defense	Mark Brady
United States Department of Defense	Andrew Burgess
United States Department of Defense	Fannie P. Callands
United States Department of Defense	Debra Cameron
United States Department of Defense	Joe Chapman
United States Department of Defense	Joseph Chapman
United States Department of Defense	Victor Ciardello
United States Department of Defense	Richard Connelly
United States Department of Defense	Leona C. Cousar
United States Department of Defense	Natalie Davis
United States Department of Defense	Pat Denard
United States Department of Defense	Louis Dixon

<b>Company</b>	<b>Contact</b>
United States Department of Defense	Linda Dodson
United States Department of Defense	Oscar Eichorn
United States Department of Defense	Karen Eiler
United States Department of Defense	Martha B. Emrick
United States Department of Defense	Barb Engelhard
United States Department of Defense	Darlene Ferrare
United States Department of Defense	Debra M. Filippi
United States Department of Defense	Mark Gaillard
United States Department of Defense	Susanne Gannon
United States Department of Defense	Theresa Gary
United States Department of Defense	Brenda Geist
United States Department of Defense	Karen Glass
United States Department of Defense	Alfred L. Green
United States Department of Defense	Jacquelyn D. Harris
United States Department of Defense	Yvonne Hartwell
United States Department of Defense	Maria Hayes
United States Department of Defense	Marty Heule
United States Department of Defense	Michelle Hodges
United States Department of Defense	Chris Houman
United States Department of Defense	James Johnson
United States Department of Defense	Juanita Jones
United States Department of Defense	Sharon L. Jones
United States Department of Defense	Ann Kim
United States Department of Defense	So Yong Kim
United States Department of Defense	Linda Klinedinst
United States Department of Defense	William Kluckman
United States Department of Defense	Michael Krieger
United States Department of Defense	Jerry Lelansky
United States Department of Defense	Marie Linder
United States Department of Defense	Barbara J. Little
United States Department of Defense	Edwin Little
United States Department of Defense	Alex Macdonald
United States Department of Defense	Jennifer Mainvielle, CTR, G7A
United States Department of Defense	Sterling Matthews
United States Department of Defense	Carole Mattice
United States Department of Defense	Stuart McElhinney
United States Department of Defense	Cindy Mills
United States Department of Defense	Pamela Monroe
United States Department of Defense	Richard A. Morales
United States Department of Defense	Roxana Nichols
United States Department of Defense	Wilson Ouyang
United States Department of Defense	Herbert Payne
United States Department of Defense	Fay Peiffer
United States Department of Defense	Peggy Pennie
United States Department of Defense	Henry Pierre-Louis

<b>Company</b>	<b>Contact</b>
United States Department of Defense	Harry D. Raduege, Jr.
United States Department of Defense	Frank Ramos
United States Department of Defense	Thomas D. Ray
United States Department of Defense	Don Reinmuller
United States Department of Defense	Natesa Robinson
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