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**UNITED STATES COURT OF APPEALS
THIRD DISTRICT**

VERONICA A. WILLIAMS,
Appellant, Pro Se

v.

LITTON MORTGAGE SERVICING LP
(PARENT OF LITTON LOAN SERVICING
LP); HSBC BANK USA, N.A.; GOLDMAN
SACHS GROUP; FREMONT HOME LOAN
TRUST 2006-C MORTGAGE- BACKED
CERTIFICATES, SERIES 2006-C; OCWEN
FINANCIAL CORPORATION; STERN &
EISENBERG, PC; THE STATE OF NEW
JERSEY

Defendants

UNITED STATES COURT OF APPEALS

Civ. No. 19-1032

PETITION FOR HEARING

(THIS IS NOT A BRIEFING DOCUMENT)

REFERRED BY:

U.S. District Court of NJ Case 2:16-cv-05301-ES-

FOR PROBLEMS WITH:

NJ Case Docket No. F – 000839-13

NJ Case Docket No. ESSX L – 004753-13

NJ Case Docket No. ESSX L – 000081-11

PETITION FOR HEARING

**“My fellow Americans: ask not what your country can do for you
—ask what you can do for your country.”**

President John F. Kennedy – [Inaugural Address](#), Jan. 20, 1961

I was taught how to be a good citizen at an early age. My parents made me watch President Kennedy’s inaugural address with them. They explained *why* I had to watch. They also explained the *importance* of what I heard. It is my civic duty to call out injustice. It is the duty of our Courts to deliver and facilitate the forum for hearing these injustices. For justice to prevail, I, the Plaintiff, must be heard in Court, in front of a jury of my peers. Here are some of the reasons why:

- The attorney whom I retained to take my case, a referral, withdrew questionably
- I have solicited virtually all lawyers in NJ, many more than once.
- **No** NJ attorneys would take my case for the amount of money that I am able to pay
- I was deceived by attorneys and others involved in this process
- Multiple attorneys who declined to represent me, encouraged me to proceed
- Most importantly, my case reveals massive and egregious crimes

I have copious notes. I can document conversations and correspondence including dates, names, phone numbers, messaging and more. Bottom line, I have no choice but to pursue my case Per Se.

I have solicited virtually all of the lawyers in the State of New Jersey at least once. Several lawyers were contacted on my behalf. I contacted countless lawyers and law firms directly. Some were referred to me, others were not. I requested assistance and recommendations from at least six NJ bar associations. Some more than once, to no avail. I made formal requests of, and I was considered, by the *only* two organizations designated to help Federal Per Se plaintiffs; they are affiliated with Rutgers & Seton Hall law schools, respectively. Both declined to represent or even assist me. I know of ties between at least one of these organizations and people who have been involved with my case. Virtually all lawyers contacted were understandably unwilling to take my case. The few that considered representing me were scared off or demanded more money than I could afford to pay. Communications are well documented. The reason that lawyers will not represent me is clear: my case implicates lawyers, Judges, NJ State employees and others who work in or service the NJ Judicial system. My case also implicates current and future executives at powerful financial service firms. Only a *fee large enough to support retirement* would make the risk of taking on my case worthwhile. To deny this Per Se Plaintiff my constitutional right to a trial based on procedural reasons is unfair at best, particularly given that intended end-to-end legal assistance has been denied to me at virtually every step.

HERCULEAN EFFORT TO ABIDE BY COURT PROCEDURES

Before filing my complaint with the U.S. District Court of New Jersey, I purchased several books including the Federal Rules of Civil Procedure¹, the Federal Rules of Evidence and Restatement of the Law, second TORTS 2d §§ (504-707A). I read the first two thoroughly, multiple times. I also studied Federal Torts laws at length. This is but a small portion of the books and other materials that I read and the extensive time and resources that I used to prepare for this case. I am not a lawyer. Lawyers spend 3 years in law school and typically 8 years to make senior partner. Lawyers have professional education, support and direction. I have spent most of my time over the

¹¹ The Federal Rules of Civil Procedure is different than the rules of civil procedure familiar to this Plaintiff. My study and compliance with the State of NJ rules date back more than 20 years. I learned the Financial Industry Regulatory Authority's (FINRA) rules before I was admitted to serve as an Arbitrator in 2009.

past 13 years preparing and working hard to defend myself against at least 25 lawyers from 4 law firms hired to stop me.

I asked several firms that provide legal per diem services. Those still in business do not accept clients “without a bar ID”. I have met with staff in the Office of the Ombudsman in multiple counties – in person and by phone – numerous times over the past 10 years. I have also visited and met with staff in the Hall of Records, the Sheriff’s Office, State and Federal law libraries, and several other NJ State offices over the years. On many occasions, due to health challenges imposed by the Defendants², I was assisted by NJ Transit’s AccessLink³ and others to attend these and other meetings. Many of my efforts are well documented on various mediums. Even while in intense pain, I have traveled and engaged every resource available to me in my effort to comply with procedures of State and Federal Judicial processes and systems. If I did not follow procedures exactly, it was not due to a herculean lack of effort to do so.

IMPACT OF FRAUDULENT MORTGAGES LIKELY IN THE BILLIONS

Just from the end of 2005 until the end of 2006 – 1 year – there were a flurry of illegal acts that violated US Torts §§ 525, 551, 531⁴. I will explain how the Defendants got away with these crimes. Over the next 13 years, I began documenting and fighting back. The more I learned, the more I was threatened. The more I was threatened, the more determined I became. Now, I take the next step that will affirm the strength and integrity of our judicial system. I shall affirm articles of our Nation’s Constitution as I exercise my God given right and obligation to do good for my country by bringing truth to light. After my trial, I will continue my quest to decimate financial fraud. Serving as the Plaintiff to expose fraud in a public trial, in front of a jury of my peers, is a critical next step.

² The U.S. Social Security Administration has classified this Plaintiff as being permanently disabled. Doctors, health professionals confirm the Plaintiff’s disabilities are caused by stress imposed by Defendants.

³ AccessLink provides accessible services available to people with disabilities and senior citizens. See https://www.njtransit.com/tm/tm_servlet.srv?hdnPageAction=AccessLinkTo

⁴ See U.S. Torts (Second), § § sec 525, sec 551(1), sec 531 noted in the Federal Complaint at http://finfix.org/Federal-Complaint-Amended-2018_Case_2-16-cv-05301.pdf

Weaknesses in California laws⁵ once allegedly allowed banks and others to get away with acts that were unethical, at best. Mortgage administrators unchecked by local laws, along with the uncovered repeal of the Glass Steagall Act, in my opinion, set the stage for Fremont to offer mortgages backed by the Hong Kong Shanghai Banking Corporation (HSBC)⁶. My case includes an example of how the stage was set for the fraud that has been, and continues to be, committed.

Fremont opened an office in central New Jersey to sell mortgages to unsuspecting homeowners. The forged mortgage was used to calculate my mortgage payments months *before* the Federal Deposit Insurance Corporation (FDIC) issued Fremont a “cease and desist” order, putting Fremont out of business. At least two of the people involved in the creation of my forged mortgage agreement moved to jobs where they had access to millions of medical records. I reported some of the crimes in my case, and provided extensive documentation, to the Federal Bureau of Investigation (FBI) at least 3 times. After many calls and correspondence, one FBI representative conducted a lengthy, astute intake interview. I also reported this in person to my local police department. I have no idea if an investigation is underway or has even been conducted. I do know that damages against me and other NJ Citizens, and likely citizens in other states continue to grow. As the former VA secretary David Shulkin recent proclaimed, “It Shouldn’t Be This Hard to Serve Your Country”⁷. Although the Federal Bureau of Investigation (FBI) and local police were asked to investigate and provided with more than enough information to bring the criminals to justice, nothing appears to have been done. The effects and damages from this criminal act continue more than 13 years later as HSBC, through a 4th mortgage servicing entity, attempts to collect more than \$1M (principal plus accrued interest) to which they are not entitled. These are just a few of the illegal acts that my case

⁵ An amendment was made to California Residential Mortgage Lending Act (“CRMLA”) in 2017; years after the FDIC issued a cease and desist order. See <https://www.thewbfirm.com/industry/california-amends-its-residential-mortgage-lending-act>

⁶ The Hong Kong Shanghai Banking Corporation, with assets once ranking HSBC as the second largest bank in the world, has funded legal actions to protect mortgage fraud. Extensive documentation is in the case records.

⁷ Title of Book released October 22, 2019, “It Shouldn’t Be This Hard to Serve Your Country”, authored by former Veterans Affairs Secretary David Shulkin. See <https://www.publicaffairsbooks.com/titles/david-shulkin/it-shouldnt-be-this-hard-to-serve-your-country/9781541762640/>

exposes. If I were to pay HSBC for this fraudulent mortgage, I would pay at least \$1M for the home that I purchased in 1983 for \$88,000. I have no doubt that other homeowners have faced the same plight.

At least two of the people involved in processing my forged mortgage now work in positions where they have access to thousands, if no millions, of medical records, a beacon for identity thieves. It is quite reasonable given my investigation that persons involved in coast to coast mortgage fraud advanced to profiting from selling personal information to a black market identity theft ring. I became the victims of identity theft after the forged mortgage agreement was created. The mortgage fraud started years of anguish and pain. My Intel suggest these person still have access to medical records

The HSBC CEO in place when the forged mortgage was created and exposed fled the United States to a country with which we reportedly do not have extraction years ago. HSBC which acquired 2 major U.S. banks, one of comparable size, laid off over 30,000 US employees and appear to have moved many US acquired assets offshore. Fremont sold mortgages that are on the books of HSBC. The magnitude of illegal acts committed by Fremont alone likely exceed astronomically more than the \$1M they still seek from me. As the second largest bank in the world with a massive mortgage portfolio on their books, HSBC could be carrying billions in illegal mortgages being collected by numerous mortgage administrators around the world. Many of the mortgages that they carry are surely bilking US homeowners. Since I began denouncing the fraud perpetrated by these Defendants, there has been a noticeable decline in the asset size⁸ of HSBC and Goldman Sachs. Indeed, they may cite different reasons for their decline in assets. Only a through, honest, FASB⁹ compliant audit of the firm's books and the books of their allies conducted by highly proficient, licensed CPAs¹⁰ *could* reveal the truth. Now that HSBC has moved their headquarters out of the

⁸ See Reference #17, page 5 in USDNJ Filing #99 http://finfix.org/proof/ADDL/Case_2-16-cv-05301_Plaintiff-Response-to-Defendants-Objection-to-Count-2nd_4-2-18.pdf

⁹ Financial Accounting Standards Board.

¹⁰ Certified Professional Accountant.

United States, such an audit may be difficult. We can stop them from enacting further damages on our citizens and we can recover some of the money stolen.

The Defendants' illegal foreclosure and ongoing illegal collection effort has literally driven me from prosperity to welfare. As the owner of a firm in business since 1986, the illegal foreclosure has shut down my capacity to borrow from reputable sources. Before the illegal foreclosure, my firm was approved for financing of a \$20M contract. We were never denied any major financing. Based on years of business success, we had been awarded 2 Federal Supply Schedules. We were pre-qualified for Federal and State purchases in excess of \$60B. Now, I cannot even get a \$500 line of credit from a reputable bank, even those with whom I have over 25 years of strong credit history. Not only did the Defendants' actions shut down my income during the 14 year prime of my career, fighting back has consumed all of my retirement assets. Now facing 64 years of age, I have been forced into retirement and permanent disability by the U.S. social Security Administration thanks to health challenges imposed by the Defendants.

The facts presented herein that are not footnoted are documented in my case records, or will be presented by witness testimony and evidentiary documents at trial.

TRIAL IS THE NEXT OF NUMEROUS STEPS IN COURAGE

I have heard the threats. I heard the fear of losing assets, never earning an income again, or worse. I have been stonewalled and threatened repeatedly since 2006. I was not born with the spirit of fear. I was taught to be of good courage. I always strive to choose the harder right rather than the easier wrong. Since I have been unable, from 2009, to find an attorney whom I was able to pay to represent me, the easier choice was to pay the illegal mortgage or cave in and accept a short sale. That would have forced me to condone all of the illegal acts that I uncovered and I would have abdicated my responsibility as a citizen.

In recent decades my **research and investigation indicate that multiple mortgage administrators and many others engaged in actions that were illegal** according to US Torts §§ 525, 551, 531 and other laws.

During my trial I will demonstrate illegal acts in many ways, including the use of at least:

- 1,200 pieces of [evidence](#)
- 140 [interrogatory](#) results
- 20 subpoenas
- 150 witnesses (some not listed for security reasons)

I have been preparing tools to help present my case in a clear and efficient manner. I have authored, designed and created a communiqué to support the delivery of my case. I bring decades of experience at simplifying the complexities of business issues and shall do this for the jury. As a nation we must decimate financial fraud. Serving as the Plaintiff in a public trial, in front of a jury of my peers, is a critical next step.

But I will not stop there. I enrolled in a Doctorate of Business Administration Program to add substance to my quest to enact financial reform. My intent is to strengthen support for and present a well-structured case for changes desperately needed in our financial system. The repeal of the Glass Steagall Act left holes in our system that Dodd Frank and other laws do not fill. Rampant fraud must be brought to light if it is to be stopped.

My case includes an example of how the repeal of the Glass Steagall Act set the stage for the fraud committed.

IT SHOULDN'T BE THIS HARD TO SERVE YOUR COUNTRY¹¹

As I wrote in my letter to the U.S. Department of Justice (DOJ)¹² which was followed by an investigation¹³ into this matter:

**The only thing necessary for the triumph of evil,
is that good [women and] men do nothing.
Edmund Burke**

I was born into and nurtured by a military family, and raised in a neighborhood of U.S. veterans in our Nations' Capital. One of the influential sayings that I heard and saw posted is "Lead, Follow or Get Out of the Way"¹⁴. I continue to believe this saying. Serving our country is in my blood. While I did not have the honor of serving in a branch of the military, I have done my civic duty throughout my life.

Since the 9/11 attack on America, many say "if you see something, say something". I have been fervently denouncing and exposing financial and legal fraud since 2006. Yet, the fraud and illegal acts against me and others continue. It has been more than two years since Ocwen reportedly claimed that charges of sloppy mistakes were "inaccurate and unfounded."¹⁵ My case proves that statement is false and that Owen's illegal acts continue. I am concerned that a recent initiative launched by Ocwen' recently acquired PHH Mortgage Services company seeks to memorialize mortgage "errors" at the expense of homeowners. I have raised the flag but have no confidence that

¹¹ Title of Book released October 22, 2019, "It Shouldn't Be This Hard to Serve Your Country", authored by former Veterans Affairs Secretary David Shulkin. See <https://www.publicaffairsbooks.com/titles/david-shulkin/it-shouldnt-be-this-hard-to-serve-your-country/9781541762640/>

¹² My letter to DOJ (see http://www.fifix.org/COURT_US-AG_HELP_4-5-15_Redacted.pdf) preceded the launch of investigation 301765. See http://www.fifix.org/proof/DD/COURT_US-AG_HELP_AssignedNo3017165.pdf. I continue to send information to DOJ. I do not know, nor do I have a need to know, if the investigation is ongoing nor do I know the result. I DO KNOW THAT THE FRAUD AGAINST ME CONTINUES YEARS LATER.

¹³ The investigation announcement is included in case documents.

¹⁴ Quote attributed to Thomas Paine and others who lived after him; see https://www.goodreads.com/author/show/57639.Thomas_Paine

¹⁵ Quote from article *Regulators Accuse Subprime Mortgage Servicer of Years of Abuses*. By Stacy Cowley and Jessica Silver-Greenberg, New York Times, Dealbook. April 20, 2017:

"Consumer Financial Protection Bureau and Florida's attorney general filed lawsuits accusing the company of making sloppy mistakes at nearly every stage of the collections process, inflicting frustration and millions of dollars in added costs on borrowers trying to pay back their home loans.

Ocwen denied the charges, calling them "inaccurate and unfounded.""

“counseling” will take place without conducting common sense, protective financial assessment¹⁶.

The time has long passed for our Courts and leaders to listen and allow our Judicial and Law Enforcement systems to help stop fraud. I chose our Judicial Courts over the Court of public opinion. The crimes exposed in this case overwhelming warrant prosecution of several professionals. As we have seen throughout history, process errors DO NOT obviate crimes. The damages imposed on this Plaintiff and others have mounted for more than a decade and continue to grow. Justice is long overdue. I pray that the Courts will prove that my faith in our justice system is well placed. Please allow me to proceed with an honest and necessary carriage of justice, that is, with a trial heard by a jury of my peers.

Respectfully submitted,

Veronica A. Williams
Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams
StopFraud@vawilliams.com

(202) 486-4565

October 31, 2019

¹⁶ I was solicited for counseling on my fraudulent mortgage by PHH Mortgage, NJ Citizens Action and the NAACP. I conveyed my concerns to those backing counseling and recommended seven steps be taken before any mortgage changes are made. See <http://finfix.org/BestPractices/Mortgage-Counseling-Refi-Best-Practices.pdf>

**UNITED STATES COURT OF APPEALS
THIRD DISTRICT**

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| <p>VERONICA A. WILLIAMS,</p> <p style="text-align: center;">Appellant, Pro Se</p> <p style="text-align: center;">v.</p> <p>LITTON LOAN SERVICING, HSBC BANK USA, N.A.; GOLDMAN SACHS GROUP; FREMONT HOME LOAN TRUST 2006-C MORTGAGE- BACKED CERTIFICATES , SERIES 2006-C; OCWEN FINANCIAL CORPORATION; STERN & EISENBERG, PC; THE STATE OF NEW JERSEY</p> <p style="text-align: center;">Defendants</p> | <p style="text-align: center;">UNITED STATES COURT OF APPEALS</p> <p style="text-align: center;">Civ. No. 19-1032</p> <p style="text-align: center;">PETITION FOR HEARING</p> <p style="text-align: center;">(THIS IS NOT A BRIEFING DOCUMENT)</p> <p>REFERRED BY: U.S. District Court of NJ Case 2:16-cv-05301-ES-</p> <p>FOR PROBLEMS WITH: NJ Case Docket No. F – 000839-13 NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11</p> |
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CERTIFICATION OF SERVICE

I, Veronica Williams, certify that on this 31st day of October 2019, a true and correct copy of this document will be sent to the parties via the method and as addressed below:

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| <p>Via Email Stuart I. Seiden, Associate Attorney for Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C</p> <p>Duane Morris LLP 30 South 17th Street Philadelphia, PA 19103-4196 Phone (215) 979-1124 Fax (215) 827-5536 siseiden@duanemorris.com</p> | <p>Via Email Steven Keith Eisenberg, Esq Attorney for Stern & Eisenberg</p> <p>Senior Partner Stern & Eisenberg, PC 1581 Main Street, Suite 200 Warrington, PA 18976 Office 267-620-2130 Fax 215-572-5025 jefis@sterneisenberg.com seisenberg@sterneisenberg.com</p> | <p>Via Email Attorney General for the State of NJ</p> <p>Mr. Gurbir S. Grewal Attorney General Office of The Attorney General The State of New Jersey Richard J. Hughes Justice Complex (HJC) 25 Market Street 8th Floor, West Wing Trenton, NJ 08625-0080 ethics@ethics.nj.gov OBCCR@njdcj.org</p> |
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Respectfully submitted,

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October 31, 2019

**UNITED STATES COURT OF APPEALS
THIRD DISTRICT**

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| <p>Via Facsimile Arun Nair Case Manager PHH Mortgage Services 1 Mortgage Way Mt. Laurel, NJ 08054</p> <p>Phone (877) 744-2506 Fax (856) 917-8300</p> | <p>Via US Mail Chetan Bachale Consumer Account Analyst Office of the Consumer Ombudsman PHH Mortgage Services 1 Mortgage Way Mt. Laurel, NJ 08054</p> | <p>Via US Mail Chetan Bachale Consumer Account Analyst Office of the Consumer Ombudsman PHH Mortgage Services PO Box 5432 Mt. Laurel, NJ 08054 Account Number 7090650115 Case Number 23314048</p> |
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Respectfully submitted,

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October 31, 2019