



Consumer Financial Protection Bureau

17 USC § 107 Limitations on Exclusive Rights – FAIR USE



Brent Pyatt
SENIOR Vice President
Collections Center

Regions Bank
John M. Turner, Jr.
President/CEO

Type	Sent	To	Length	Status	
Fax	12/18/2020 11:30:29 AM (2)	[REDACTED]	1 Page	Consumer Financial Protection Bureau Kathy Krainger c/o Divine, Salemi, Barrett	Sent
Fax	12/18/2020 11:29:43 AM (8)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:28:46 AM (8)	[REDACTED]	1 Page	U.S. Solicitor General Francisco	Sent
Fax	12/18/2020 11:27:09 AM (2)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:27:09 AM (2)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:25:57 AM (8)	[REDACTED]	1 Page	FREDDIE MAC David Brickman	Sent
Fax	12/18/2020 11:25:57 AM (5)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:25:57 AM (5)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:24:00 AM (2)	[REDACTED]	1 Page	REGIONS - Niekia Pierce	Sent
Fax	12/18/2020 11:23:13 AM (2)	[REDACTED]	1 Page	REGIONS - Zonetta McCray	Sent
Fax	12/18/2020 11:22:10 AM (2)	[REDACTED]	1 Page	U.S. TREASURY Steven Mnuchin	Sent
Fax	12/18/2020 11:22:10 AM (2)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:20:01 AM (2)	[REDACTED]	1 Page	Congresswoman Nancy Pelosi	Sent
Fax	12/18/2020 11:19:01 AM (6)	[REDACTED]	1 Page	REGIONS – Teresa Rogers	Sent
Fax	12/18/2020 11:18:12 AM (2)	[REDACTED]	1 Page	US DOJ - Attorney General William Barr	Sent
Fax	12/18/2020 11:18:12 AM (2)	[REDACTED]	1 Page		Sent
Fax	12/18/2020 11:14:32 AM (6)	[REDACTED]	1 Page	REGIONS – Tameka Council	Sent

OBJECTION(S) TO and RESPONSE TO CONSUMER FINANCIAL PROTECTION BUREAU [CFPB] COMPLAINTS [REDACTED] 8 and [REDACTED] 9; DEMAND FOR MORE DEFINITIVE ANSWERS TO CLAIMS and/or AVERMENTS SET FORTH IN CFPB COMPLAINTS; DEMAND FOR CERTIFICATION OF REGIONS ALLEGE RESPONSE - - DEMAND FOR CFPB RESPONSE BY JANUARY 4, 2021

Apple Cider

Phone: [REDACTED]

applecider@bubblemum.website

December 18, 2020

VIA EMAIL and/or FACSIMILE

Consumer Financial Protection Bureau

ATTN: Kathy Krainger – Director

c/o Attorneys/Jessica Rank Divine, Esq.

c/o Bernard Barrett, Esq.

c/o Michael G. Salemi, Esq.

1700 G. Street, NW

Washington, DC 20552

COURTESY COPIES TO:

To Branch Location Representative VIA FACSIMILE and/or EMAIL

Regions Bank

ATTN: John M. Turner, Jr. – President/Chief Executive Officer

ATTN: Brent Pyatt – Senior Vice President Collection Center

c/o Branch Manager/Representative For Delivery To John M. Turner, Jr. At:

1900 Fifth Avenue North

Birmingham, Alabama 35203

VIA EMAIL and/or FACSIMILE

United States Department of Justice/Office Of Solicitor General

ATTN: Solicitor General/Noel Francisco

ATTN: William Pelham Barr – United States Attorney General

c/o Melissa Golden – Office of Legal Counsel

c/o Bradley P. Humphreys, Esq.

c/o Elizabeth J. Shapiro, Esq.

950 Pennsylvania Avenue, NW

Washington, DC 20530

VIA EMAIL and/or FACSIMILE: [REDACTED]

United States House of Representatives

ATTN: Speaker Of The House/Nancy Pelosi

c/o Pattie Ross

**RE: OBJECTION(S) TO and RESPONSE TO CONSUMER FINANCIAL PROTECTION BUREAU [CFPB] COMPLAINTS [REDACTED] 8 and [REDACTED] 9; DEMAND FOR MORE DEFINITIVE ANSWERS TO CLAIMS and/or AVERMENTS SET FORTH IN CFPB COMPLAINTS; DEMAND FOR CERTIFICATION OF REGIONS ALLEGE RESPONSE - - DEMAND FOR CFPB RESPONSE BY JANUARY 4, 2021
REGIONS BANK LOAN/ACCOUNT [REDACTED] 888
REGIONS FEDERAL IDENTIFICATION # [REDACTED] 12**

Victim(s) Apple Cider

Greetings To All:

I, Apple Cider/Apple Cider Bey, come to the Consumer Financial Protection Bureau¹ (“CFPB”) in Love, Truth, Peace, Freedom and Justice.² Please be advised that the document(s) provided at the link(s) is incorporated by reference as if set forth in full herein.

I. FORMAL and OFFICIAL DEMAND For Answers, Findings and Response

This instant document is to serve as my (Apple Cider’s) **FORMAL and OFFICIAL demand** that the CFPB provide me with more definitive Answers to the claims and/or averments provided in my Complaint(s) as well as provide me with EVIDENCE of Regions’³ **ANSWERS** as well as the CFPB’s **FINDINGS and RESPONSE** to the following set forth in my September 28, 2020 correspondence and CFPB Complaints [REDACTED] 8 and [REDACTED] 9 TO THE:

1. Eight (8) Claims and/or Averments:



September 28, 2020

VIA HAND DELIVERY To Branch Location Representative and/or FACSIMILE and EMAIL
Regions Bank
ATTN: John M. Turner, Jr. – President/Chief Executive Officer
ATTN: Brent Pyatt – Senior Vice President Collection Center
c/o Branch Manager/Representative For Delivery To John M. Turner, Jr. At:
1900 Fifth Avenue North
Birmingham, Alabama 35203

VIA EMAIL and/or FACSIMILE
Consumer Financial Protection Bureau
ATTN: Kathy Krainger – Director
c/o Attorneys/Jessica Rank Divine, Esq.
c/o Bernard Barrett, Esq.
c/o Michael G. Salemi, Esq.
1700 G. Street, NW
Washington, DC 20552

VIA EMAIL and/or FACSIMILE
United States Department of Justice/Office Of Solicitor General
ATTN: Solicitor General/Noel Francisco
ATTN: William Pelham Barr – United States Attorney General
c/o Melissa Golden – Office of Legal Counsel
c/o Bradley P. Humphreys, Esq.
c/o Elizabeth J. Shapiro, Esq.
950 Pennsylvania Avenue, NW
Washington, DC 20530

¹ Consumer Protection Financial Bureau (a/k/a “CFPB”) when mentioned includes its Officers, Officials, Representatives, Employees, Agents and/or Legal Counsel, etc.

²BOLDFACE, Small Caps, Italics, Underline, etc. are for purpose of emphasis.

³ Regions and/ or Regions Bank when mentioned includes its Officers, Officials, Representatives, Employees, Agents and/or Legal Counsel, etc.

VIA EMAIL and/or FACSIMILE: [REDACTED]
United States House of Representatives
ATTN: Speaker Of The House/Nancy Pelosi
c/o Pattie Ross

RE: RESPONSE TO REGIONS 09/22/20; REMINDER OF NOTICE OF INTENT TO BRING LEGAL/LAWFUL ACTION FOR RELIEF; REGIONS' CONTINUED ATTEMPTS TO EXTORT MONIES DISGUISED AS FEES; NOTICE OF INTENT TO REPORT REGIONS TO CONSUMER FINANCIAL PROTECTION BUREAU; REITERATION OF CONFLICTS OF INTEREST; CEASE and DESIST; UPDATE OF GOOD-FAITH SETTLEMENT DEMANDS; STATUS OF CHECK NO. [REDACTED] and DEMAND FOR RESPONSE, INFORMATION and "GOOD STANDING LETTER" REGIONS BANK LOAN/ACCOUNT [REDACTED] REGIONS FEDERAL IDENTIFICATION [REDACTED]

Victim(s) [REDACTED]

"I. RESPONSE TO REGIONS 09/22/20 Correspondence"
Set forth in Paragraphs No. 1. through 8.

[REDACTED] [Ww80-](#)
[REDACTED] [7478b0](#)

2. **Sixteen (16) Claims and/or Averments:**
"II. REMINDER OF NOTICE OF INTENT TO BRING LEGAL/LAWFUL ACTION FOR RELIEF"
Set forth in Paragraphs No. 1. through 16.
3. **Four (4) Claims and/or Averments:**
"III. REGIONS' CONTINUED ATTEMPTS TO EXTORT MONIES DISGUISED AS FEES"
Set forth in Paragraphs No. (1) through (4)
4. **Two (2) Claims and/or Averments:**
"IV. NOTICE OF INTENT TO REPORT REGIONS TO CONSUMER FINANCIAL PROTECTION BUREAU"
Set forth in Paragraphs No. 9 through 10
5. **Claims and/or Averments:**
"V. REITERATION OF CONFLICTS OF INTEREST"
6. **Four (4) Claims and/or Averments:**
"VI. CEASE and DESIST"
Set forth in Paragraphs No. 11. through 14.

7. **Two (2) Claims and/or Averments:**

“VII. UPDATE OF GOOD-FAITH SETTLEMENT DEMANDS”

Set forth in Paragraphs No. 1) and 2)
as well as the SETTLEMENT DEMAND AMOUNT(S) and DESCRIPTION
provided to justify the RELIEF, etc. sought.

8. **Claim(s) and/or Averment(s):**

“VIII. STATUS OF CHECK NO. 2471”

To date, both Regions and the CFPB **have FAILED to provide me with EVIDENCE** as to the Status of Check No. 2471 – i.e. **“WHERE” is it?** Please provide me with evidence of contested Check No. 2471 in the amount of \$65.97 and **“HOW”** this payment was processed [i.e. in that Regions provided a Receipt for \$50.00; however, I have no record of “HOW” the contested \$15.97 was handled and/or applied]. **“HOW” Regions processed my 08/24/20 payment** – i.e. In that Regions records support a **“FALSE” Entry** in the processing and handling of my contested payment and **“REUSING”** Check No. 2466 that was provided as my contested payment on 07/24/20, and Regions’ engagement in Criminal Acts, etc. appears for purposes of covering up such unlawful practices and atrocities, etc. To date, Check No. 2471 does NOT appear on any of my Statements for the above referenced Regions Account.

9. **Claims and/or Averments:**

“IX. DEMAND FOR RESPONSE, INFORMATION and “GOOD STANDING LETTER”

and FAILURE to provide me with documents to support Regions’:

- (A) Foreign Registration Statement;**
- (B) Performance Bond; and**
- (C) Oath of Office**

in that to date, NEITHER the record of the CFPB, Regions’ NOR my record provide me with a response to the Claims and/or Averments set forth in my 09/28/20 Correspondence to Regions – i.e. which, it appears, the CFPB concluded that the September 28, 2020, correspondence to be **a legitimate Complaint** and proceeded to open up a Formal Complaint (██████████8).

II. DEMAND THAT CONSUMER FINANCIAL PROTECTION BUREAU PROVIDE REGIONS' RESPONSE IN ACCORDANCE WITH THE STATUTES, CODES, RULES and/or REGULATIONS GOVERNING SUCH MATTERS

This is to advise that upon review of the CFPB's records regarding CFPB Complaints [REDACTED] 8 and [REDACTED] 9, I (Apple Cider) do **NOT** see any evidence of support the documents the CFPB advised to have been received by Regions is a Response to the claims and/or averments set forth in my CFPB Complaints. Therefore, any such claims the CFPB may assert to be a response to my CFPB Complaint(s) are rejected. In further support thereof, the following FACTS are noted:

1. The CFPB appears to have filed letters dated October 1, 2020, and October 13, 2020, from Regions; however, in accordance to the Statutes, Codes, Rules and Regulations, etc. governing such matters, the letters provided by Regions **are NOT** a response to my CFPB Complaints [REDACTED] 8 and [REDACTED] 9. Therefore, in the interest of JUSTICE, the CFPB, through this instant document is hereby TIMELY, PROPERLY and ADEQUATELY notified that if it is asserting that Regions "LETTERS" dated October 1, 2020, and October 13, 2020, are Responses to CFPB Complaints [REDACTED] 8 and [REDACTED] 9, that such assertions by the CFPB is false, misleading and fraudulent, etc. and, therefore, my OBJECTION(S) made! Moreover, the **FORM letters** the CFPB appears to claim as being responses to the Complaints (when they **are NOT**) filed are clearly an insult to the CFPB as well as appears to be a reflection of the CFPB's incompetence to handle such matters that are within its jurisdiction!
2. My September 28, 2020 correspondence was drafted in accordance to Rule 8 of the Rules of Civil Procedure (i.e. as of 12/16/20, may be found at the following Links:

https://www.law.cornell.edu/rules/frcp/rule_8

<https://www.federalrulesofcivilprocedure.org/frcp/>

https://www.uscourts.gov/sites/default/files/federal_rules_of_civil_procedure_dec_1_2019_0.pdf

requiring (in part) that any such *Claim for Relief* **MUST** contain the following – i.e. however; not limited to the following:

- A) A short and plain statement of the claim showing entitlement to relief; and
- B) A demand for the relief sought – i.e. which may include relief in the alternative or different types of relief.

3. Upon review of the CFPB Records, the following FACTS are noted:
- i. **Regions' RESPONSES "In General" MUST** (in accordance to Rule 8 of Civil Rules of Civil Procedure):

a) State in short and plain terms defenses to **"EACH"** claim asserted; and

b) **Admit or deny** the allegations asserted in my CFPB Complaint and/or September 28, 2020 Correspondence.

However, the letters the CFPB appears to accept as response to my CFPB Complaints [REDACTED] 8 and [REDACTED] 9 are NOT in compliance with the Statutes, Codes, Rules and Regulations, etc. governing such matters. Therefore, any assertion by the CFPB claiming Regions letters to be are responses to my CFPB Complaints are REJECTED and my OBJECTIONS made!

- ii. **DENIALS** – If denial(s) are asserted, the denial **MUST** fairly *respond to the substance* of the claim(s) and/or averment(s) made.

The Region letters (it appears the CFPB may be asserting is a response to CFPB Complaints [REDACTED] 8 and [REDACTED] 9) do NOT respond to the claims and/or averments made in my CFPB Complaints. Therefore, any assertion by the CFPB claiming Regions letters to be are responses to my CFPB Complaints are REJECTED and my OBJECTIONS made!

- iii. **GENERAL and SPECIFIC DENIALS** – If Regions intended to in "good faith" to deny the allegations set forth in my claims and/or averments, Regions may do so by a general denial; however, Regions has failed to do so. Furthermore, if Regions had intend to deny all the allegations presented in my September 28, 2020 Correspondence and the CFPB Complaints [REDACTED] 8 and [REDACTED] 9, Regions had the opportunity to do so; however, chose NOT to! Regions is NOT EXEMPT from the mandatory response requirement guidelines governing how denials must be presented. Therefore, any assertion by the CFPB claiming Regions letters to be are responses to my CFPB Complaints are REJECTED and my OBJECTIONS made!

- iv. **DENYING PART Of An Allegation** – If Region had intended to in “good faith” deny only part of the claims, averments and/or allegations set forth in my September 28, 2020 correspondence and/or the CFPB Complaints ██████████ 8 and ██████████ 9, as a matter of the laws governing these matters, Regions MUST admit the part that is true and deny the rest.

Regions knew and/or should have known that the letters provided to the CFPB alleging to be responses were NOT and were merely provided for dilatory purposes and for malicious purpose to cause frustration, vexatious acts and/or litigation, anxiety, ill intent, and other reasons known to Regions. Regions responses are NOT in compliance with the Statutes, Codes, Rules and/or Regulations governing such matters. Therefore, any assertion by the CFPB claiming Regions letters to be are responses to my CFPB Complaints are REJECTED and my OBJECTIONS made!

- v. **LACKING KNOWLEDGE or INFORMATION** – If Regions lacked knowledge or information sufficient to meet the mandatory guidelines governing such matters, then Regions must state so. However, Regions has failed to do so and the **Laws are clear that any such claims (as lacking knowledge or information) cannot be asserted when knowledge and information may be obtained from Regions records, reasonable research, etc.**

Regions knew and/or should have known that the letters provided to the CFPB alleging to be responses were NOT in compliance with the Statutes, Codes, Rules and Regulations governing such matters, and, moreover; were merely provided for dilatory purposes and for malicious purpose to cause frustration, vexatious acts and/or litigation, anxiety, ill intent, and other reasons known to Regions. Therefore, any assertion by the CFPB claiming Regions letters to be are responses to my CFPB Complaints are REJECTED and my OBJECTIONS made as well as NOTIFICATION to the CFPB that I take such calculated and deliberate dilatory practices by Regions to those in which the CFPB is complicit and CONDONES in their efforts to aid and abet Regions in WAR Crimes, Criminal Acts and other Atrocities, etc. reported!

- vi. **EFFECT OF FAILING TO DENY** – As a matter of Statutes, Codes, Rules and/or Regulations governing such matters, Regions’ failure to address each of the claims and/or averments in my September 28, 2020 correspondence as well as the CFPB Complaints ██████████ 8 and ██████████ 9, are deemed an admission – i.e. in

that clearly, Regions having knowledge that a “RESPONSE” to “each” claim/averment is required; however, made a willful, deliberate, conscience and calculated decision NOT to provide responses in accordance to the Statutes, Codes, Rules and Regulations governing such matters. Therefore, any assertion by the CFPB claiming Regions letters to be are responses to my CFPB Complaints are REJECTED and my OBJECTIONS made!

4. It appears from my research, the CFPB is very familiar with “HOW” claims in Complaints are to be presented and/or pled as well as “HOW” Complaints are to be Answered and or “HOW” Responses to Complaints filed are to comply with guidelines as that presented in Rule 8 of the Civil Rules of Civil Procedure. In support of this statement, the following evidence is presented:

i) On or about **December 11, 2015**, the Consumer Financial Protection Bureau filed a **“First Amended Complaint”** in the United States District Court – Southern District of New York against Defendant NDG Financial Corp, and others. In the drafting of that Complaint, the CFPB did so in accordance to [Rule 8 of the Civil Rules of Civil Procedure](#) and/or other Statutes and Laws governing such filings and numbering each of the claims set forth.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Consumer Financial Protection Bureau,

Plaintiff,

v.

NDG Financial Corp., Northway Financial Corp., Ltd., Northway Broker, Ltd., E-Care Contact Centers, Ltd., Blizzard Interactive Corp., New World Consolidated Lending Corp., New World Lenders Corp., Payroll Loans First Lenders Corp., New World RRSP Lenders Corp., Peter Ash, Sagewood Holdings, Ltd., Kimberly DeThomas, Jeremy Sabourin, William Wrixon,

Defendants,

Peter Ash, Sagewood Holdings, Ltd., Paul Ash, Knightsbridge Holdings Ltd., Paul Grehan, 0562752 B.C. Ltd., Kimberly DeThomas, Emerald Willow Holdings, Ltd., Jeremy Sabourin, Red River Holdings Company Ltd., William Wrixon, Twillingate Holdings Ltd.

Relief Defendants.

Case No. 15cv5211 (CM)

FIRST AMENDED COMPLAINT

The Consumer Financial Protection Bureau (Bureau) brings this action against NDG Financial Corp., Northway Financial Corp., Ltd., Northway Broker, Ltd., E-Care Contact Centers, Ltd., Blizzard Interactive Corp., New World Consolidated Lending Corp., New World Lenders Corp., Payroll Loans First Lenders Corp., New World RRSP Lenders Corp., Peter Ash, Sagewood Holdings Ltd., Kimberly DeThomas, Jeremy Sabourin, and William Wrixon (Defendants). The Bureau also names Peter Ash, Sagewood Holdings, Ltd., Paul Ash, Knightsbridge Holdings, Ltd., Paul Grehan, 0562752, B.C. Ltd., Kimberly DeThomas, Emerald Willow Holdings, Ltd., Jeremy

Defendants' Collection Practices

159. Once the loan is disbursed to the consumer, E-Care collects delinquent payments on behalf of the NDG Enterprise.
160. E-Care, using the name of the DBA website through which the consumer selected the loan, contacts delinquent consumers by phone, e-mail, and letter, restating the consumer's obligation to repay the principal and interest in full, along with a \$39.00 NSF fee, and a \$20.00 late payment fee.
161. In numerous instances, the NDG Enterprise, through E-Care, falsely represented to consumers that non-payment of debt would result in lawsuit, arrest, imprisonment, or wage garnishment, despite lacking the intention or legal authority to take such actions.
162. In fact, the NDG Enterprise had no intention of suing individuals in the United States.
163. In correspondence with an ODFI, Defendants admitted that they do not sue individuals in the United States.
164. The NDG Enterprise also has no intention of employing wage garnishment as a collections technique.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Consumer Financial Protection Bureau,
Plaintiff,

v.

NDG Financial Corp., Northway Financial Corp., Ltd., Northway Broker, Ltd., E-Care Contact Centers, Ltd., Blizzard Interactive Corp., New World Consolidated Lending Corp., New World Lenders Corp., Payroll Loans First Lenders Corp., New World RRSP Lenders Corp., Peter Ash, Sagewood Holdings, Ltd., Kimberly DeThomas, Jeremy Sabourin, William Wrixon,

Case No. 15cv5211 (CM)

FIRST AMENDED COMPLAINT

Defendants,

Peter Ash, Sagewood Holdings, Ltd., Paul Ash, Knightsbridge Holdings Ltd., Paul Grehan, 0562752 B.C. Ltd., Kimberly DeThomas, Emerald Willow Holdings, Ltd., Jeremy Sabourin, Red River Holdings Company Ltd., William Wrixon, Twillingate Holdings Ltd.

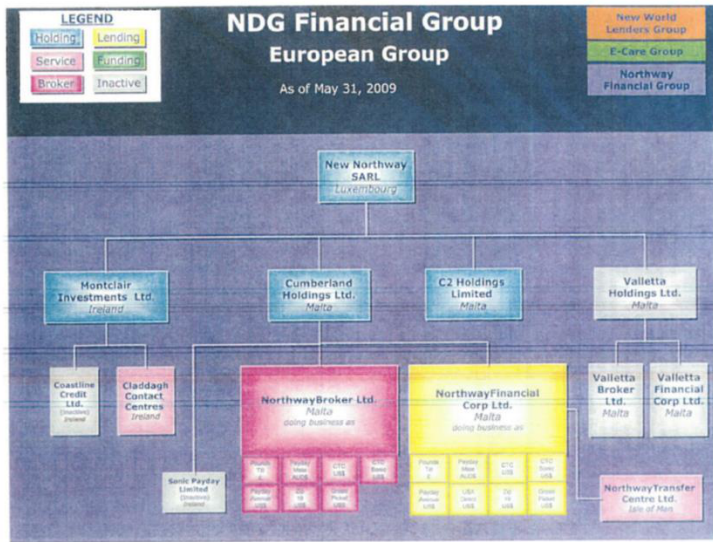
Relief Defendants.

The Consumer Financial Protection Bureau (Bureau) brings this action against NDG Financial Corp., Northway Financial Corp., Ltd., Northway Broker, Ltd., E-Care

STRUCTURE OF THE NDG ENTERPRISE

108. The NDG Enterprise is split into two groups: (1) the European Group and (2) the Canadian Group.

109. Below are NDG Group organizational charts for the European Group and the Canadian Group in 2009:



As of 12/17/20, a copy of which may be found at the following Link(s):

https://drive.google.com/file/d/1RyA28GUM8n4pO_YfuszoljM_a7b4acT4C

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b58656daca097>

- ii) On or about **January 13, 2017**, the *Canadian NDG Defendants* filed an **“Answer”** to the Consumer Financial Protection Bureau Complaint in the United States District Court – Southern District of New York. In the drafting of that Answer, these Defendants did so in accordance to **Rule 8 of the Civil Rules of Civil Procedure** and/or other Statutes and Laws governing such filings and numbering each of the answers, responses and/or denials set forth.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
..... X
CONSUMER FINANCIAL PROTECTION
BUREAU,

Plaintiff,

-against-

NDG FINANCIAL CORP., NORTHWAY
FINANCIAL CORP., LTD., NORTHWAY
BROKER, LTD., E-CARE CONTACT CENTERS,
LTD., BLIZZARD INTERACTIVE CORP., NEW
WORLD CONSOLIDATED LENDING CORP.,
NEW WORLD LENDERS CORP., PAYROLL
LOANS FIRST LENDERS CORP., NEW WORLD
RRSP LENDERS CORP., PETER ASH,
SAGEWOOD HOLDINGS, LTD., KIMBERLY
DETHOMAS, JEREMY SABOURIN, and
WILLIAM WRIXON,

15-cv-5211 (CM)

Defendants,

PETER ASH, SAGEWOOD HOLDINGS, LTD.,
PAUL ASH, KNIGHTSBRIDGE HOLDINGS LTD.,
PAUL GREHAN, 0562752 B.C. LTD., KIMBERLY
DETHOMAS, EMERALD WILLOW HOLDINGS,
LTD., JEREMY SABOURIN, RED RIVER
HOLDINGS COMPANY LTD., WILLIAM
WRIXON, and TWILLINGATE HOLDINGS LTD.,

Relief Defendants.

..... X

CANADIAN NDG DEFENDANTS' ANSWER TO FIRST AMENDED COMPLAINT

DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797
Telephone: (212) 698-3500
Facsimile: (212) 698-3599

159. The Canadian NDG Defendants deny the allegations in Paragraph 159.
160. The Canadian NDG Defendants deny the allegations in Paragraph 160.
161. The Canadian NDG Defendants state that the allegations in Paragraph 161 contain legal conclusions, including the reference to the “NDG Enterprise,” to which no response is required. To the extent a response is required, the Canadian NDG Defendants deny the allegations in Paragraph 161.
162. The Canadian NDG Defendants state that the allegations in Paragraph 162 contain legal conclusions, including the reference to the “NDG Enterprise,” to which no response is required. To the extent a response is required, the Canadian NDG Defendants deny the allegations in Paragraph 162.
163. The documents identified in Paragraph 163 are not described with sufficient particularity, and therefore the Canadian NDG Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations based on those documents. To the

108. The Canadian NDG Defendants state that the allegations in Paragraph 108 contain legal conclusions, including the reference to the “NDG Enterprise,” to which no response is required. To the extent a response is required, the Canadian NDG Defendants deny the allegations in Paragraph 108.

109. The documents identified in Paragraph 109 are not described with sufficient particularity, and therefore the Canadian NDG Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations based on those documents. To the extent a response is required, the Canadian NDG Defendants deny the allegations in Paragraph 109.

As of 12/17/20, a copy of which may be found at the following Link(s):

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b58656fbb6f9b>

https://drive.google.com/file/d/1L1q-5vZdE2r_oHvm2l_rm91xKzKQz6-S

- iii) On or about **January 13, 2017**, the *Grehan Relief Defendants* filed an **“Answer”** to the Consumer Financial Protection Bureau Complaint in the United States District Court – Southern District of New York. In the drafting of that Answer, these Defendants did so in accordance to **Rule 8 of the Civil Rules of Civil Procedure** and/or other Statutes and Laws governing such filings and numbering each of the answers, responses and/or denials set forth.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU,

Plaintiff,

NDG FINANCIAL CORP., NORTHWAY FINANCIAL
CORP., LTD., NORTHWAY BROKER, LTD., E-CARE
CONTACT CENTERS, LTD., BLIZZARD
INTERACTIVE CORP., NEW WORLD
KONCONSOLIDATED LENDING CORP., NEW
WORLD LENDERS CORP., PAYROLL LOANS FIRST
LENDERS CORP., NEW WORLD RRSP LENDERS
CORP., PETER ASH, SAGEWOOD HOLDINGS, LTD.,
KIMBERLY DETHOMAS, JEREMY SABOURIN,
WILLIAM WRIXON,

Defendants,

PETER ASH, SAGEWOOD HOLDINGS, LTD., PAUL
ASH, KNIGHTSBRIDGE HOLDINGS, LTD., PAUL
GREHAN, 0562752 B.C. LTD., KIMBERLY
DETHOMAS, EMERALD WILLOW HOLDINGS, LTD.,
JEREMY SABOURIN, RED RIVER HOLDINGS
COMPANY LTD., WILLIAM WRIXON,
TWILLINGATE HOLDINGS LTD.,

Relief Defendants.

**RELIEF DEFENDANTS PAUL GREHAN'S AND 0562752 B.C. LTD.'S
ANSWER TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Relief Defendants Paul Grehan ("Grehan") and 0562752 B.C. Ltd. ("0562752," together
with Grehan, the "Grehan Relief Defendants"), by its attorneys, Levine Lee LLP, for its Answer
to the First Amended Complaint filed by the Consumer Financial Protection Bureau ("CFPB"),
respond as follows.

In responding to all of the allegations below, Grehan Relief Defendants: (i) deny all of
the First Amended Complaint's allegations unless expressly admitted herein; and (ii) deny any

Civ. No. 1:15-cv-5211 (CM)

ECF Case

Defendants' Collection Practices

159. Paragraph 159 consists of legal assertions to which no response is required; to the extent a response is required, Grehan Relief Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159, and therefore deny them.
160. Grehan Relief Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160, and therefore deny them.
161. Grehan Relief Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161, and therefore deny them.
162. Grehan Relief Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162, and therefore deny them.

22

As of 12/17/20, a copy of which may be found at the following
Link(s):

[https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b586571bca8
a6](https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b586571bca8a6)

[https://drive.google.com/file/d/1KnNbKDAoALwSc4-
B7trFEOTeTCyAmZRI](https://drive.google.com/file/d/1KnNbKDAoALwSc4-B7trFEOTeTCyAmZRI)

- iv) On or about **January 13, 2017**, the *Ash Defendants* filed an
"**Answer**" to the Consumer Financial Protection Bureau
Complaint in the United States District Court – Southern
District of New York. In the drafting of that Answer, these
Defendants did so in accordance to **Rule 8 of the Civil Rules of
Civil Procedure** and/or other Statutes and Laws governing
such filings and numbering each of the answers, responses
and/or denials set forth.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Consumer Financial Protection Bureau,
Plaintiff,

v.

NDG Financial Corp., Northway Financial
Corp., Ltd., Northway Broker, Ltd., E-Care
Contact Centers, Ltd., Blizzard Interactive Corp.,
New World Consolidated Lending Corp., New
World Lenders Corp., Payroll Loans First
Lenders Corp., New World BRSF Lenders
Corp., Peter Ash, Sagewood Holdings, Ltd.,
Kimberly DeThomas, Jeremy Sabourin, William
Wrixon,

15-ev-5211 (CM)

Defendants,

Peter Ash, Sagewood Holdings, Ltd., Paul Ash,
Knightsbridge Holdings Ltd., Paul Graham,
0562752 B.C., Ltd., Kimberly DeThomas,
Emerald Willow Holdings, Ltd., Jeremy
Sabourin, Red River Holdings Company Ltd.,
William Wrixon, Twillingate Holdings Ltd.,

Relief Defendants.

**ANSWER OF SAGEWOOD HOLDINGS LTD., KNIGHTSBRIDGE HOLDINGS
LTD., PETER ASH AND PAUL ASH TO PLAINTIFF'S AMENDED COMPLAINT**

Defendants and Relief Defendants Peter Ash, Sagewood Holdings Ltd. ("Sagewood")
and Relief Defendants Paul Ash and Knightsbridge Holdings Ltd. ("Knightsbridge") and
collectively, the "Ash Defendants", by their undersigned attorneys, hereby answer plaintiff's
first amended complaint (the "Amended Complaint").

Each of the Ash Defendants respectfully submits that this Court lacks personal
jurisdiction over the Ash Defendants in this action for the reasons set forth in defendants'

159. The Ash Defendants deny the existence of the "NDG Enterprise" as described
by plaintiff. The Ash Defendants deny knowledge or information sufficient to form a belief
as to the truth or falsity of the remaining allegations in paragraph 159.

160. The Ash Defendants deny knowledge or information sufficient to form a belief
as to the truth or falsity of the allegations in paragraph 160.

161. The allegations in paragraph 161 state legal conclusions as to which no
responsive pleading is required. To the extent any response is deemed to be required, the Ash
Defendants deny the allegations in paragraph 161 to the extent they relate to the Ash
Defendants, except deny knowledge or information sufficient to form a belief as to the truth

21

108. The Ash Defendants deny the allegations in paragraph 108.

109. The Ash Defendants state that the charts referenced in paragraph 109 speak for
themselves and deny any characterization of the documents that is inconsistent with their
terms, and refer the Court to the charts for their contents thereof.

110. The Ash Defendants deny the existence of the "NDG Enterprise" as described
by plaintiff. The Ash Defendants deny the remaining allegations in paragraph 110.

111. The Ash Defendants deny the allegations in paragraph 111, except (i) admit
that on approximately September 1, 2013, Sagewood transferred its financial interest in NDG
to Emerald Willow Holdings, Ltd. and Knightsbridge transferred its financial interest in NDG
to Red River Holdings Company Ltd., and (ii) deny knowledge or information sufficient to
form a belief as to the truth or falsity of the allegations concerning 0562752.

As of 12/17/20, a copy of which may be found at the following
Link(s):

[https://drive.google.com/file/d/1AsUwWv2ve8IQDsqQfxk-
iF_20rRajVoj](https://drive.google.com/file/d/1AsUwWv2ve8IQDsqQfxk-iF_20rRajVoj)

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b58657079b4>

99

v) On or about **June 7, 2012**, Judicial Watch, Inc. filed a **“Complaint”** in the United States District Court – For The District Of Columbia against Defendant Consumer Financial Protection Bureau. In the drafting of that Complaint, Judicial Watch, Inc. did so in accordance to **Rule 8 of the Civil Rules of Civil Procedure** and/or other Statutes and Laws governing such filings and numbering each of the claims set forth.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC.
425 Third Street, SW, Suite 800
Washington, D.C. 20024,

Plaintiff,

v.

CONSUMER FINANCIAL
PROTECTION BUREAU
1700 G St., NW
Washington, DC 20220

Defendant.

Civil Action No.

COMPLAINT

Plaintiff Judicial Watch, Inc. brings this action against Defendant Consumer Financial Protection Bureau to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). As grounds therefor, Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

4. Defendant Consumer Financial Protection Bureau (“CFPB”) is an agency of the U.S. Government and is headquartered at 1700 G. Street, NW, Washington DC 20220. CFPB has possession, custody, and control of certain public records to which Plaintiff seeks access.

STATEMENT OF FACTS

5. On January 12, 2012, Plaintiff submitted a FOIA request to CFPB, by facsimile and certified mail, seeking access to the following public records:

1. All records of communications between the CFPB and the White House concerning President Obama’s January 6, 2012 visit to the CFPB, as reported in the enclosed *Politico* article [Joseph Williams, *Obama takes victory lap at CFPB*, *Politico* (Jan. 6, 2012)].
2. All records of communications between the CFPB and the following entities concerning President Obama’s recess appointment of Richard Cordray as director of the CFPB:
 - a. The White House;
 - b. The Executive Office of the President;
 - c. The Department of the Treasury;
 - d. The United States Congress.

6. On January 25, 2012, Plaintiff submitted another FOIA request to CFPB, by facsimile and certified mail, seeking access to the following public records:

1. All communications concerning, referring, or relating to Richard Cordray’s appointment as director of the CFPB;
 2. All reimbursements, reservations, vouchers and any other documentation reflecting travel and lodging for Mr. Cordray, his family, any additional guests, and the Ohio judge who in January 2012 accepted Mr. Cordray’s Oath of Office in Washington, D.C.
- The time frame for this request is December 1, 2011 through the present.

As of 12/17/20, a copy of which may be found at the following Link(s):

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b586672ab9f>

96

<https://drive.google.com/file/d/1CHOy1A3axqsvk7Ddeu7oDkFtMzsRmrsZ>

- vi) On or about **July 18, 2012**, the Consumer Financial Protection Bureau filed an **“Answer”** in the United States District Court – For The District Of Columbia regarding Judicial Watch, Inc.’s. In the drafting of that Answer, the CFPB did so in accordance to **Rule 8 of the Civil Rules of Civil Procedure** and/or other Statutes and Laws governing such filings and numbering each of the answers, responses and/or denials set forth.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC.)
) Plaintiff,)
v.) Case No. 1:12-cv-00931 (EGS)
CONSUMER FINANCIAL PROTECTION)
BUREAU,) Defendant.)

ANSWER

Defendant Consumer Financial Protection Bureau, by and through its undersigned

counsel, hereby answers Plaintiff’s Complaint (“Complaint”):

FIRST DEFENSE

Plaintiff has failed to exhaust its administrative remedies.

SECOND DEFENSE

Defendant responds to each numbered paragraph of the Complaint as follows:

1. Paragraph 1 states legal conclusions as to the Court’s jurisdiction to which no response is required.

5. Defendant admits that it received a FOIA request from Plaintiff seeking access to records described in Paragraph 5, that it received that request on January 26, 2012, and that it received that request by certified mail. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 5.

6. Defendant admits that it received a FOIA request from Plaintiff seeking access to records described in Paragraph 6, that it first received that request on January 26, 2012, and that it received that request by facsimile and certified mail. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 6.

7. The first sentence of Paragraph 7 purports to summarize a statutory provision, which speaks for itself, and states legal conclusions to which no response is required. To the extent a response is required, Defendant admits the existence of the cited statutory provision, to which the Court is referred for a full and accurate statement of its contents. The second sentence of Paragraph 7 states legal conclusions to which no response is required. To the extent a response is required, Defendant denies the allegations in the second sentence of Paragraph 7.

As of 12/17/20, a copy of which may be found at the following Link(s):

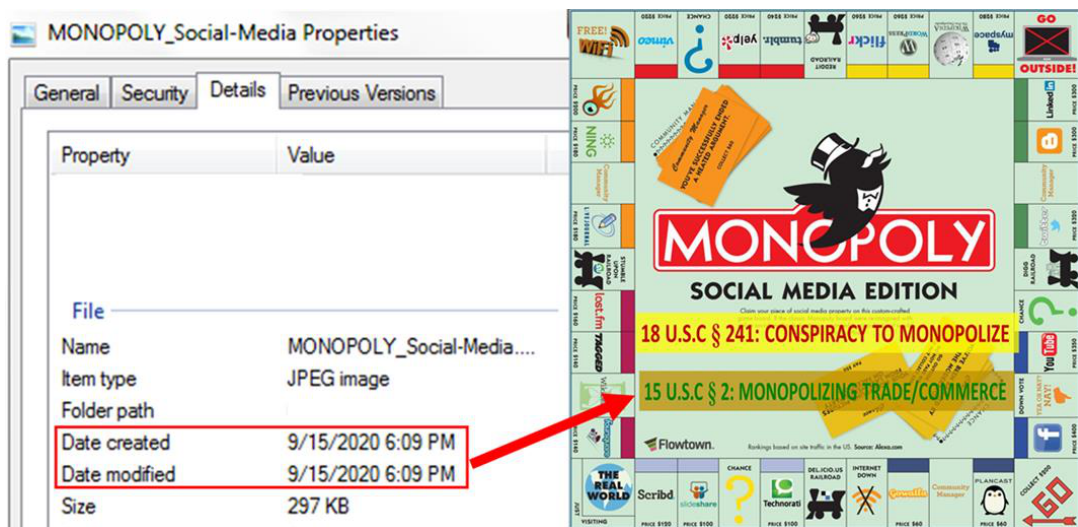
<https://drive.google.com/file/d/1MhQZXS4Ly2wHRN6tclslxxKIT54Rlgwk>

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b5866757ab298>

III. CONSUMER FINANCIAL PROTECTION BUREAU’S HANDLING OF COMPLAINT(S) IS A FAR DEPARTURE FROM THIS AGENCY’S HANDLING OF SIMILAR COMPLAINTS DUE TO SYSTEMATIC DISCRIMINATORY and RETALIATORY PRACTICES OF MEMBERS OF THE PROTECTED CLASS

This instant document is to serve as my (Apple Cider) **FORMAL and OFFICIAL objection** of the CFPB’s handling of my Complaint(s) and (from research and the evidence), the far departure, criminal acts and continued War Crimes, etc. being carried out against me as well as other Class Members PROTECTED and SECURED from such unlawful practices reported. In further support, the following facts are also noted:

1. The CFPB was timely, properly and adequately NOTIFIED of my concerns of the CFPB being a Party in CONSPIRACIES as well as MONOPOLIES, etc. to which Regions is associated with.
2. The CFPB, Regions, United States as well as my Records, etc. will support that evidence has been provided to support a **CONFLICT OF INTEREST**; however, to date, neither the CFPB nor Regions has addressed this issue. Therefore, through this instant document, I ask that the CFPB provide me with a response within **15 days (by Monday, January 4, 2021)** as to WHY it failed to disclose this information to me.
3. The CFPB, Regions, United States as well as my Records, etc. will support that evidence has been provided to support **MONOPOLIES – i.e. in which it appears the CFPB is a Party to**; however, to date, the CFPB nor Regions has addressed this issue. Therefore, through this instant document, I ask that the CFPB provide me with a response within **15 days (by Monday, January 4, 2021)** as to WHY it failed to disclose this information to me. Moreover, confirm or deny that the CFPB is affiliated with the Monopolies that Regions and the United States, etc. is engaged in.



**The following United States Department of Justice Complaint
was filed on or about October 20, 2020:**

Case 1:20-cv-03010 Document 1 Filed 10/20/20 Page 1 of 64

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

STATE OF ARKANSAS
323 Center Street, Suite 200
Little Rock, AR 72201

STATE OF FLORIDA
PL-01, The Capitol
Tallahassee, FL 32399

STATE OF GEORGIA
40 Capitol Square SW
Atlanta, GA 30334

STATE OF INDIANA
302 West Washington Street
IGCS – 5th Floor
Indianapolis, IN 46204

COMMONWEALTH OF KENTUCKY
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601

STATE OF LOUISIANA
1885 North Third Street
Baton Rouge, LA 70802

STATE OF MISSISSIPPI
P.O. Box 220
Jackson, MS 39205

STATE OF MISSOURI
P.O. Box 899
Jefferson City, MO 65102

STATE OF MONTANA
P.O. Box 200151
Helena, MT 59620

STATE OF SOUTH CAROLINA
1000 Assembly Street
Rembert C. Dennis Building
P.O. Box 11549
Columbia, SC 29211-1549

and

STATE OF TEXAS
P.O. Box 12548
Austin, TX 78711

Plaintiffs,

v.

GOOGLE LLC
1600 Amphitheatre Parkway
Mountain View, CA 94043

Defendant.

COMPLAINT

The United States of America, acting under the direction of the Attorney General of the United States, and the States of Arkansas, Florida, Georgia, Indiana, Kentucky, Louisiana, Mississippi, Missouri, Montana, South Carolina, and Texas, acting through their respective Attorneys General, bring this action under Section 2 of the Sherman Act, 15 U.S.C. § 2, to restrain Google LLC (Google) from unlawfully maintaining monopolies in the markets for general search services, search advertising, and general search text advertising in the United States through anticompetitive and exclusionary practices, and to remedy the effects of this conduct.

As of 12/17/20, a copy of the above United States Department of Justice, et al. Complaint **AGAINST Google** under such Statutes as **15 U.S.C. § 2: MONOPOLIZING TRADE/COMMERCE**:

<https://drive.google.com/file/d/1Q5TPxcGC0uA6NGOwzsxg7gB42P-Eh1s2>

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b595e6eb8a6af>

4. **FAILURE TO ACT** for decades resulting in the formation of MASS MONOPOLIES in efforts of undermining and unlawfully prohibiting JUSTICE for myself and other Members of the PROTECTED Class that have been targeted by what are known as White Supremacist Groups, Organizations, etc. with malicious intent to destroy me, steal my identity, lands, properties and assets, etc.

https://www.law360.com/firms/baker-donelson/clients

News, cases, companies, firms

Great West Casualty Co. (29)

Wal-Mart Stores Inc. (28)

First Horizon National Corporation (27)

Mylan NV (26)

Allstate Corporation (25)

Caterpillar Inc. (25)

Novartis AG (24)

Exxon Mobil Corporation (23)

Northrop Grumman Corpo (23)

A. O. Smith Corporation (22)

Lincoln Electric Holdings In (22)

Wyndham Worldwide Corpora (22)

Endo International Plc (22)

Geico (22)

Murphy Oil Corporation (20)

Praxair, Inc. (20)

Safeco (20)

Direct General Corp. (19)

JPMorgan Chase & Co. (18)

Viacom Inc. (17)

Nationwide Mutual Insurance Co. (16)

Actavis PLC (15)

Minnesota Life Insurance Co. (15)

Cracker Barrel Old Country Store Inc. (14)

The Travelers Companies Inc. (14)

Farmers Insurance Group (14)

Caliber Home Loans Inc. (14)

Baxter International Inc. (13)

Methodist Hospital System (13)

Esurance Insurance Services Inc. (13)

Fannie Mae (12)

Ruby Tuesday Inc. (12)

Suntrust Banks Inc. (12)

The Bank of New York Mellon Corp. (12)

MONOPOLIES - Insurance Companies Properties

Property	Value
Name	MONOPOLIES - Insurance Compan...
Item type	PNG image
Folder path	
Date created	9/22/2020 1:31 PM
Date modified	9/22/2020 1:31 PM

CFPB Complaint using “FAILURE TO ACT” as a claim:

[https://www.morganlewis.com/documents/m/documents/\(201344130\)\(1\)finreg-cfpb-intercept%20corp-complaint-mar222017.pdf](https://www.morganlewis.com/documents/m/documents/(201344130)(1)finreg-cfpb-intercept%20corp-complaint-mar222017.pdf)

Dismissed **WITHOUT** Prejudice:

[https://www.morganlewis.com/documents/m/documents/\(201344131\)\(1\)finreg-cfpb-interceptcorp-order-mar%2022%202017.pdf](https://www.morganlewis.com/documents/m/documents/(201344131)(1)finreg-cfpb-interceptcorp-order-mar%2022%202017.pdf)

Thus, the CFPB alleged in its Complaint that there were numerous “red flags” that ought to have alerted Intercept to the shortcomings of some of its customers, and that **its failure to act**—a form of either negligence or willful blindness—amounted to assisting and facilitating the UDAAP violations of Intercept’s small lender and debt collector customers.

Even taking these allegations as true, which a court is required to do in deciding a Rule 12 motion, the CFPB made no allegations about how Intercept’s **negligence or willful blindness** was unfair and thereby caused injury to a consumer that was not outweighed by a benefit.

--- <https://www.morganlewis.com/blogs/finreg/2017/03/can-udaap-be-fettered-a-court-says-yes>

5. **FAILURE TO ACT** has resulted in THREATS my Life, Livelihood, Liberties, Properties, Assets, and Protected Rights, etc. NOW Regions, United States Officials, CFPB Officials are CONSPIRING to cover up WAR Crimes and/or Criminal Acts that have been reported! Moreover, the CFPB is encouraging the continuance of such War Crimes by Regions and is complicit in such Criminality, etc.

17 USC § 107 Limitations on Exclusive Rights – FAIR USE



U.S. v. Jimenez Recio, 123 S.Ct. 819 (2003) - Essence of a conspiracy is an agreement to commit an unlawful act . . .

Agreement to commit an unlawful act, which constitutes the essence of a conspiracy, is a distinct evil that may exist and be punished whether or not the substantive crimes ensues . . .

Conspiracy **poses a threat to the public** over and above the threat of the commission of the relevant substantive crime, both because *the combination in crime makes more likely the commission of other crimes* and because it **decreases the probability** that *the individuals involved will depart from their path of criminality*.

6. The record evidence will support my sharing concerns of Regions' role in Racketeering Scams/Schemes that adversely impact me and/or Members of the PROTECTED Class. Nevertheless, the CFPB has done nothing, when this crime was reported through my Complaint(s). Therefore, through this instant document, I ask that the CFPB provide me with a response within **15 days (by Monday, January 4, 2021)** as to WHY it failed to disclose its role in such Racketeering Scams/Schemes. Moreover, confirm or deny that the CFPB is affiliated with the SAME Racketeering Empire(s) that Regions and the United States, etc. is affiliated with.



In the CFPB's response, **please provide me with the NUMBER of Lawsuits** the CFPB is a **Defendant in matters involving Credit Bureaus** (i.e. as Equifax, Experian, Transunion; however, NOT limited to these and/or specifically these three, etc.)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division

KEVIN L. COFIELD, SR., et al.,

Plaintiffs,

v.

EQUIFAX INC., et al.,

Defendants.

Case No. 1:17-cv-3119-CCB

Judge: Catherine C. Blake

DEFENDANTS' CONSENT TO NOTICE OF REMOVAL

Defendants Equifax Inc., Equifax Information Services, LLC, Experian Information Solutions, Inc., TransUnion Consumer Solutions, TransUnion Corp., Consumer Financial Protection Bureau, and Federal Trade Commission ("Consenting Defendants") hereby provide notice of their unanimous consent to Defendant United States' removal of this action to federal court, and in support thereof, state the following:

As of 12/18/20, the above referenced, “Defendants’ Consent To Notice of Removal” may be found at the following Links:

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b5a5f6fa86f9f>

https://drive.google.com/file/d/11PAAZa3Vb5qjSD8X_zNtzMa3fkRjld9a

7. Please provide me with the CFPB’s findings as it relates to Regions engagement in creating **FALSE Entries** for the purpose of generating fraudulent fees and extorting monies from me and/or Consumers in violation of **18 U.S.C. § 1005: Bank Entries, Reports and Transactions**. I ask that the CFPB provide me with a response within **15 days (by Monday, January 4, 2021)** as to its finding on these issues; moreover, provide me with information regarding *my contested payment Check 2471 tendered* – i.e. where it is and what happened to it as it does **NOT** reflect on my Statement(s).



18 U.S.C. § 1005: Bank Entries, Reports and Transactions and other Statutes/Laws governing said matters which states in part:

Whoever, being an officer, director, agent or employee of any Federal Reserve bank, member bank. . .

Whoever makes any false entry in any book, report, or statement of such bank. . . with intent to injure or defraud . . . any individual person . . .

Shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.



18 U.S. Code § 1005. Bank entries, reports and transactions

U.S. Code Notes

[prev](#) | [next](#)

Whoever, being an officer, director, agent or employee of any Federal Reserve bank, member bank, [depository institution holding company](#), national bank, insured bank, [branch or agency of a foreign bank](#), or organization operating under section 25 or section 25(a)⁽¹⁾ of the [Federal Reserve Act](#), without authority from the directors of such bank, branch, agency, or organization or company, issues or puts in circulation any notes of such bank, branch, agency, or organization or company; or

Whoever makes any false entry in any book, report, or statement of such bank, company, branch, agency, or organization with intent to injure or defraud such bank, company, branch, agency, or organization, or any other company, body politic or corporate, or any individual person, or to deceive any officer of such bank, company, branch, agency, or organization, or the Comptroller of the Currency, or the Federal Deposit Insurance Corporation, or any agent or examiner appointed to examine the affairs of such bank, company, branch, agency, or organization, or the Board of Governors of the Federal Reserve System; or

Whoever with intent to defraud the United States or any agency thereof, or any financial institution referred to in this section, participates or shares in or receives (directly or indirectly) any money, profit, property, or benefits through any transaction, loan, commission, contract, or any other act of any such financial institution—

Shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

8. It appears from my Research and the information found, that Financial Institutions and their Officials (as Regions' Executives) have a pattern of engaging in such criminal acts as creating false entries, engaging in conspiracies, creating false statements with **exorbitant fees**, etc.

Former Bank Of The Commonwealth Executive Sentenced To 17 Years In Prison For Massive Fraud

NORFOLK, Va. – Stephen G. Fields, 49, of Chesapeake, Virginia, was sentenced today to 17 years in prison, followed by 5 years of supervised release, for conspiracy to commit bank fraud, **false entries in** bank records, misapplication of bank funds, and false statement to a financial institution. The Court further ordered Fields to pay \$331,860,955.43 in restitution to the Federal Deposit Insurance Corporation, and to forfeit \$61,625,789.79 in proceeds from the offense. . . .

“Today’s sentencing shows that **bank executives who engage in illegal activities** that undermine the public trust will be brought to justice,” said Mark Bialek, Inspector General of the Board of Governors of the Federal Reserve System and the Consumer Financial Protection Bureau. “We will continue to work with our law enforcement partners **to vigorously pursue wrongdoers whose fraudulent actions** materially impact the Federal Reserve Board’s supervision program.”

As of 12/17/20: <https://www.justice.gov/usao-edva/pr/former-bank-commonwealth-executive-sentenced-17-years-prison-massive-fraud>

9. Please advise whether or not the CFPB will be bringing the applicable action against Regions as well as reporting Regions’ War Crimes and/or Criminal Act to the proper Authorities as required by Statutes, Codes Rules, and Regulations governing such matters. I ask that the CFPB provide me with a response within **15 days (by Monday, January 4, 2021)** as to its finding on these issues; moreover, how it intends to handle Regions engaging in False Entries and the Restitution and/or Relief I am lawfully entitled to for the injuries/harm sustained as set forth in my Settlement Demand(s).

Former United Commercial Bank (UCB) Chief Credit Officer,
Previously Sentenced to Over Eight Years in Prison, Ordered to
Pay Over \$946 Million in Restitution

During the previous reporting period, we reported that after a jury trial, the former Chief Operating Officer and Chief Credit Officer for UCB of San Francisco was found guilty of one count each of conspiracy to commit false bank entries, reports, and transactions; **false bank entries**, reports, and transactions; conspiracy to commit securities fraud; securities fraud; falsifying corporate books and records; false statements to accountants; and circumventing internal accounting controls. These activities were carried out as part of a scheme to conspire with others in the bank to falsify key bank records in order to conceal millions of dollars in losses and falsely inflate the bank’s financial statements. The defendant was sentenced to 97 months in prison.

During the current reporting period, the defendant was ordered to pay over \$946 million in restitution. UCB's bank holding company, UCB Holdings Inc., was supervised by the Board.

As 12/17/20: <https://oig.federalreserve.gov/reports/SAR-April2016.pdf>

IV. CONSUMER FINANCIAL PROTECTION BUREAU PROVIDE FINDINGS AND CONCLUSION FOR THE CLAIMS SET FORTH IN COMPLAINT REGARDING "REQUESTS FOR ADMISSION; SETTLEMENT DEMAND AND DEMAND FOR DISCHARGE OF MORTGAGE"

Please be advised that this instant document serves as my (Apple Cider's) **FORMAL and OFFICIAL** demand that the Consumer Financial Protection Bureau provide me the CFPB's findings and conclusion as it relates to the claims set forth in my CFPB Complaint **201001-5526616** submitted for filing on or about October 18, 2020, regarding **"REQUESTS FOR ADMISSION; SETTLEMENT DEMAND AND DEMAND FOR DISCHARGE OF MORTGAGE"** A copy of this submittal may be found at the following Links:

 [6dadacae](#)

 [lTHd7Xp](#)

I ask that the CFPB provide me with a response within **15 days** (by **Monday, January 4, 2021**) as to its finding on these the claims and averments made.

V. CONSUMER FINANCIAL PROTECTION BUREAU PROVIDE DOCUMENTATION REQUESTED

Please be advised that this instant document serves as my (Apple Cider's) **FORMAL and OFFICIAL** demand that the Consumer Financial Protection Bureau provide me with INFORMATION (if available) of Regions' Collection Center's Senior Vice President Brent Pyatt:

- (A) **Foreign Registration Statement;**
- (B) **Performance Bond; and**
- (C) **Oath of Office**

PLEASE BE ADVISED: That if Regions and/or Pyatt asserts that this information is NOT available and/or is refusing to provide, the reason(s) for refusal. I ask that the CFPB provide me with a response within **15 days** (by **Monday, January 4, 2021**) as to its finding on these issues.

VI. DEMAND FOR CERTIFIED COPY OF THE CONSUMER FINANCIAL PROTECTION BUREAU'S RECORD REGARDING COMPLAINTS [REDACTED] 8 and [REDACTED] 9

Please be advised that this instant document serves as my (Apple Cider's) **FORMAL and OFFICIAL** demand that the Consumer Financial Protection Bureau provide me a "CERTIFIED and NOTARIZED" copy of record for CFPB Complaints [REDACTED] 8 and [REDACTED] 9 along with a letter of acknowledgement that an Investigation has been conducted and the CFPB's Findings and Conclusion. If the CFPB is refusing to provide me with the letter I am demanding, please provide me with the reasons for refusal. Please submit this documentation to me at the following mailing address:

Apple Cider
Post Office Box [REDACTED]
[REDACTED], Florida [32034]



**25 USC § 194 – TRIAL OF RIGHT OF PROPERTY;
BURDEN OF PROOF**

In all trials about the right of property in which an Indian may be a party on one side, and a white person on the other, the burden of proof shall rest upon the white person, whenever the Indian shall make out a presumption of title in himself from the fact of previous possession or ownership.

The INTERNATIONAL Laws are clear regarding INTERNATIONAL Tribunals available to me since *our Native Tribunals* have been destroyed and/or are not available at this time. Because the United States is a "**PRIVATELY held Company,**" and **not** a Government (as it has PERPETRATED to the World), please be advised, that under INTERNATIONAL Laws, of **my entitlement and privilege, etc.** to pursue JUSTICE through the applicable INTERNATIONAL Tribunals available to me, and, my every intention to do so!

PLEASE BE ADVISED: The processes used in resolving this matter are in accordance with International Laws governing matters involving Natives and/or Indigenous People, etc. for **preservation and evidential** purposes to support my good-faith efforts to resolve these issues and the need for International Intervention since, according to the United States Constitution, I **am NOT** seen as a Citizen and do NOT see myself as Citizen of the United States!

Moreover, that the provisions that were set forth in Treaties to protect Natives and/or Indigenous People (as myself) are NOT being honored, etc. Furthermore, supporting the United States' Corporation Agencies' Officials' **"INABILITY"** and **"INCOMPETENCE"** in resolving such disputes and injustices reported and CONTINUED to violation of Protected Rights that have been set forth through Treaties, etc.

Pope says indigenous people must have final say about their land

Francis echoes growing body of international law and standards on the right to 'prior and informed consent'



▲ Pope Francis in Rome last week when he said indigenous peoples have the right to 'prior and informed consent' regarding their lands and territories. Photograph: AP

In the 15th century papal bulls promoted and provided legal justification for the conquest and theft of indigenous peoples' lands and resources worldwide - the consequences of which are still being felt today. The right to conquest in one such bull, the *Romanus Pontifex*, issued in the 1450s when Nicholas V was the Pope, was granted in perpetuity.



Wednesday 15.02.2017

N. 170215a

The Pope greets representatives of Indigenous Peoples participating in the Third Forum held by the International Fund for Agricultural Development (IFAD)

As of 12/18/20, Pope Says Indigenous People MUST Have FINAL Say About Their Land

<https://www.theguardian.com/environment/andes-to-the-amazon/2017/feb/20/pope-indigenous-people-final-say-land>

Vatican Press Release

https://drive.google.com/file/d/1a3ru61p_ebJJIHaVEatw01GGfD4Kcwn

<https://login.filesanywhere.com/fs/v.aspx?v=8c6b638b5a5f70b5a4ac>

PLEASE BE ADVISED: It has been brought to my attention that the United States as well as the State of Mississippi has an UNLAWFUL practice of subjecting Natives and/or Indigenous People to what they have created known as **"BLACK CODES,"** etc. I believe my *Identification Card* is sufficient to rebut any such claims and assertions made through such UNLAWFUL **connotations** (as the BLACK CODES, etc.); moreover, Treaties as that of the [Chickasaw/Choctaw Treaty of 1866](#) and *others* set forth the provisions the United States of America's Officials are to make. Nevertheless, here we are, as WAR Crimes and Criminal Acts continue to be carried out against me and the record evidence supports the United States, REFUSAL to Act upon [Treaties alleging to provide us with protection](#), etc.; however, are being REPEATEDLY violated! Moreover, the process used in my good-faith efforts to resolve such issues, further support *descendants of the Criminals* that INVADED our Lands/Territories Hundreds of Years Ago are STILL engaging in WAR Crimes and Criminal Acts in their continued efforts to STEAL our Lands, Territories and Properties **and continue** to REFUSE TO CORRECT the INJUSTICES reported against Natives and Indigenous People through such BANK and FINANCIAL Scams/Schemes as that being used by Regions and other BIG BANKS, etc.

PLEASE BE ADVISED, that this instant document serves as my:

OBJECTION(S) TO and RESPONSE TO CONSUMER FINANCIAL PROTECTION BUREAU [CFPB] COMPLAINTS [REDACTED] 8 and [REDACTED] 9; DEMAND FOR MORE DEFINITIVE ANSWERS TO CLAIMS and/or AVERMENTS SET FORTH IN CFPB COMPLAINTS; DEMAND FOR CERTIFICATION OF REGIONS ALLEGE RESPONSE - - DEMAND FOR CFPB RESPONSE BY JANUARY 4, 2021

and that I (Apple Cider) reserve the right to amend should it become and/or be deemed necessary.

This document may also be sent to you via email and will be coming from [REDACTED] [.website](#) . If you do not see this email, you may want to check your Spam Folder and/or folder in which mail that may be mistaken as spam is stored.

Thank you for your attention and assistance with this matter. Should either of you have any questions, please do not hesitate to contact me at the Mailing address provided on my Letterhead **and** by Email (i.e. as a two-step process to assure receipt of correspondence regarding the above referenced matters).

Respectfully submitted in Love, Truth, Peace Freedom and Justice,

Dated this 18th day of **December, 2020.**

Autograph: _____
Apple Cider (a/k/a Apple Cider Bey) UCC1-308

Print Name: _____

cc: Copy for Personal File