

COMPLAINT NARRATIVE

Claims against Employees of Chase Manhattan Bank USA, NA and Chase Bank USA, NA The following is a summary of the fraudulent mortgage loan origination processes that were used to defraud, and permanently destroy the creditworthiness of Mrs. Barnes in 2004 and 2005 by Mr. Matthew Balin, and other employees of the Chase Manhattan Bank USA, NA office located in Fort Washington, PA. In March 2004, while employed as a Chase lending specialist for Chase Manhattan Bank USA, NA, Mr. Mathew Balin: ? Purchased illegally-acquired real estate applicant leads , and maintained an Illicit business relationship with fax.com; a notorious fax spammer that had been previously fined and censured by FTC, and the States of California and Washington. (See list of FTC actions, and copy of the actual fax received by Mrs. Barnes in Appendix G of this document.) ? Convinced Mrs. Barnes that a new “low-interest” conventional refinancing loan was a better option for her than the second mortgage or Line of Credit (LOC) that she was seeking . ? Used illegal “Bait and Switch” tactics during the negotiating of the terms and conditions of the mortgage loan. This included promising to obtain a low-interest conventional first lien loan for Mrs. Barnes, and then originating a conventional refinancing loans at subprime interest rates, that cost her more than nineteen thousand dollars in loan closing fees. ? Committed multiple instances of mortgage loan fraud while creating HUD Uniform Residential Loan Application(s) for Mrs. Barnes; fraudulent entries included grossly inflated monthly income, wrong marital status, false employment history, and other fraudulent information. (See Tables 1 and 2, on pages 16 and 19, respectively.) ? Colluded with Chase underwriters while creating the fraudulent mortgage loan application for Mrs. Barnes to ensure that her conventional mortgage loan application would be acceptable to the lender. ? Committed overt racial discrimination and racial profiling offences by refusing to enter Mrs. Barnes’ African American race in the Race and Ethnicity section of her loan application . ? Added six discount points (that equaled \$17,370) to this loan resulting in a total closing cost of \$20,782.. ? Created a new conventional refinancing first lien loan for Mrs. Barnes on March 16, 2005.

ATTACHMENTS

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<Y:\rightnow\Incident\1400778\CLAIM DOCUMENT 2 - NATIONWIDE-DIRECT SUBPRIME MORTGAGE LENDING BOILER ROOM.pdf> (5.1 MB)

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