

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	

**DEBTOR’S REPLY IN FURTHER SUPPORT OF ITS OBJECTION TO CLAIM
NUMBER 1074 FILED BY LUE DAVID JACKSON**

The Debtor, the City of Detroit (the “City”), by and through its undersigned counsel, for its reply (the “Reply”) to Lue David Jackson’s letter dated April 6, 2015¹ (the “Letter”) [Dkt. No. 9627], and in further support of the City’s Thirteenth Omnibus Objection to Certain No Basis Claims (“Thirteenth Omnibus Objection”) [Dkt. No. 9568] regarding claim number 1074 (the “Claim”), respectfully states as follows:

BACKGROUND

1. On July 18, 2013 (the “Petition Date”), the City filed this bankruptcy case.
2. On November 21, 2013, this Court entered its *Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof* (the “Bar Date Order”) [Dkt. No. 1782].
3. On July 9, 2014, this Court entered its Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 Approving Claim Objection Procedures [Dkt. No. 5872] (the “Claims

¹ The Court docketed Mr. Todd’s letter dated April 6, 2015 as a Letter, not as a Response on its ECF system. Therefore, the City files this Reply in an abundance of caution in the event the Letter is treated as a Response.



Procedures Order”), allowing the City to file an omnibus objection with respect to claims that do not identify a valid basis for any liability of the City or which were filed without supporting documentation (Claim Procedures Order at 2.).

4. On February 18, 2014, Mr. Jackson filed the Claim as a general unsecured claim in the amount of \$71,825.81.

5. On March 30, 2015, the City filed its Thirteenth Omnibus Objection [Dkt. No. 9568]. As to the claims objected to in the Thirteenth Omnibus Objection, the City determined that there was no basis for liability on the part of the City as stated in the respective proofs of claim.

6. In his Claim, Mr. Jackson stated that the basis for his claim is “Contingent & unsecured principal & interest charges.” Mr. Jackson’s proof of Claim No. 1074 is attached as **Exhibit 1**.

7. The City filed the Thirteenth Omnibus Objection and objected to Mr. Jackson’s Claim because there is no basis for any liability to Mr. Jackson. Upon review of Mr. Jackson’s Claim, it appears to have been filed for claims relating to Mr. Jackson’s mortgage. Individual mortgage agreements between the claimant and his lender, to which the City is not a party, are not the subject of this bankruptcy claims administration process.

8. Attached to Mr. Jackson’s proof of claim are deed and title documents, as well as property tax and mortgage bill information from Bank of America.

9. Mr. Jackson does not allege that the City owes him any money.

10. On or about March 30, 2015, Mr. Jackson was served notice of the Thirteenth Omnibus Objection. *See* Notice at Dkt. 9568.

11. On April 6, 2015, Mr. Jackson filed a Letter with this Court apparently alleging that his Claim should not be expunged, but stating no arguments in support thereof. The Letter does not provide any basis or documentation in support of the Claim.

12. Because Mr. Jackson does not provide an appropriate basis for liability on the part of the City, the Claim should be expunged.

ARGUMENT

13. Section 502(a) of the Bankruptcy Code provides that a claim is deemed allowed unless a party in interest objects. 11 U.S.C. § 502(a).² Bankruptcy Rule 3007(d) and the Claims Procedure Order allow the City to object to multiple claims in an omnibus objection if the objections are based on the grounds that the claims should be disallowed and expunged because there is no basis for liability on the part of the City or there is no documentation submitted with the proof of claim supporting the claims.

14. Only proofs of claim that comply with Bankruptcy Rule 3001 are presumed to be valid in the amount filed.

15. In order to meet the requirements of Rule 3001(f), a properly-filed proof of claim must contain the following: (1) the creditor's name and address; (2) the basis for the claims; (3) the date the debt was incurred; (4) the amount of the claim; (5) classification of the claim; and (6) supporting documents. *In re Hughes*, 313 B.R. 205, 209 (Bankr. E.D. Mich. 2004) (McIvor, J.) (*citing In re Dow Corning Corp.*, 250 B.R. 298, 321 (Bankr. E.D. Mich. 2000)).

16. Pursuant to Section 101 of the Bankruptcy Code, a creditor holds claim against a debtor only to the extent that it has a "right to payment" for the asserted liability. *See* 11 U.S.C. §§ 101(5), 101(10). There is no right to payment to the extent that the asserted liability is not

² Section 502 of the Bankruptcy Code is applicable to this Chapter 9 case through Section 901 of the Bankruptcy Code. *See* 11 U.S.C. § 901.

due and owing by the debtor.

17. Mr. Jackson's Claim does not state a proper basis for liability against the City nor does it include any supporting documentation. Therefore, the Claim should be expunged due to its failure to meet the requirements of Federal Rule of Bankruptcy Procedure 3001.

18. Mr. Jackson's Claim appears to be for the payment of Mr. Jackson's mortgage. Individual mortgage agreements between the claimant and his lender, to which the City is not a party, are not the subject of this bankruptcy claims administration process. Mr. Jackson has provided no basis for liability on the part of the City.

WHEREFORE, the City respectfully requests that this Court enter an order disallowing and expunging the Claim, and granting the City such other and further relief as this Court may deem just and proper.

Dated: May 1, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon

John A. Simon (P61866)

Jeffrey S. Kopp (P59485)

Tamar N. Dolcourt (P73425)

Leah R. Imbrogno (P79384)

500 Woodward Ave., Ste. 2700

Detroit, MI 48226

313.234.7100

jsimon@foley.com

jkopp@foley.com

tdolcourt@foley.com

limbrogno@foley.com

*Counsel for the Debtor, City of Detroit,
Michigan*

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2015, I caused the *City of Detroit's Reply in Support of Its Objection to Claim Number 1074 Filed By Lue David Jackson* to be electronically filed with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF participants in this bankruptcy case. I hereby certify that a copy was also served via Federal Express to the following party:

Lue David Jackson
9336 Pierson
Detroit, MI 48228

Dated: May 1, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon
John A. Simon (P61866)
Jeffrey S. Kopp (P59485)
Tamar N. Dolcourt (P73425)
Leah R. Imbrogno (P79384)
500 Woodward Ave., Ste. 2700
Detroit, MI 48226
313.234.7100
jsimon@foley.com
jkopp@foley.com
tdolcourt@foley.com
limbrogno@foley.com

*Counsel for the Debtor, City of Detroit,
Michigan*

EXHIBIT 1

B10 (Official Form 10) (04/13) (Modified)

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT of MICHIGAN		RECEIVED
Name of Debtor: City of Detroit, Michigan	Case Number: 13-53846	FEB 18 2014
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing.		KURTZMAN CARSON CONSULTANTS COURT USE ONLY
Name of Creditor (the person or other entity to whom the debtor owes money or property): Property Owner <u>LUE DAVID JACKSON</u>		
Name and address where notices should be sent: NameID: 11590154 Property Owner 9336 Pierson Detroit, MI 48228 Telephone number: <u>313-273-3609</u> email: _____		<input type="checkbox"/> Check this box if this claim amends a previously filed claim. Court Claim Number: _____ (If known) Filed on: _____
Name and address where payment should be sent (if different from above): <u>LUE DAVID JACKSON</u> <u>9336 PIERSON</u> <u>DETROIT MI 48228-1508</u> Telephone number: <u>313-273-3609</u> email: _____		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.
1. Amount of Claim as of Date Case Filed: <u>\$ 3764.19</u> If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.		
2. Basis for Claim: <u>Contingent + Unsecured Principal + Interest Charges</u> (See instruction #2)		
3. Last four digits of any number by which creditor identifies debtor: <u>4362 9118 Nation Star Mortgage</u>	3a. Debtor may have scheduled account as: <u>First + FRANKLIN FIN CORP</u> (See instruction #3a) <u>BANK of AMERICA HLT Nation Star Mortgage</u> Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: <u>Interest + principal charges</u> Amount of Secured Claim: \$ _____ Amount Unsecured: \$ <u>71825.81</u>	
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input checked="" type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ <u>80000</u> Annual Interest Rate (when case was filed) <u>10.75%</u> <input type="checkbox"/> Fixed or <input checked="" type="checkbox"/> Variable		
5. Amount of Claim Entitled to Priority as an Administrative Expense under 11 U.S.C. §§ 503(b)(9) and 507(a)(2). \$ <u>NONE</u>		
5b. Amount of Claim Otherwise Entitled to Priority. Specify Applicable Section of 11 U.S.C. § _____ \$ <u>NONE</u>		
6. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6) <u>yes</u>		
7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
8. Signature: (See instruction # 8) Check the appropriate box. <input checked="" type="checkbox"/> I am the creditor. <input type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) (See Bankruptcy Rule 3004.) I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief. Print Name: <u>LUE DAVID JACKSON</u> Title: <u>Creditor + property owner</u> Company: _____ Address and telephone number (if different from notice address above): _____ Telephone number: _____ email: _____ <u>Lue David Jackson</u> 2-14-2014 (Signature) (Date)		

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

STATE OF
MICHIGAN
Wayne County
April 23, 2007 02:39:00 PM
Receipt # 141126



REAL ESTATE
TRANSFER TAX
\$88.00 - CO
\$688.00 - ST
Stamp # 14635

Wayne County Register of Deeds

April 23, 2007 02:39 PM

Liber 46237 Page 378-378

#207193488 MD FEE: \$15.00



COMMONWEALTH LAND TITLE

WARRANTY DEED

The Grantor(s) John Miller and Marcia Miller, husband and wife,
whose address is P.O Box 3174, Farmington Hills, MI
convey(s) and warrant(s) to Lue David Jackson and Helen Williams-Jackson, Husband and Wife,
whose address is 9336 Pierson, Detroit, MI 48228
the following described premises situated in the City of Detroit, County of Wayne and State of Michigan:

South 5 Feet of Lot 294 and all of Lot 295 and North 5 Feet of Lot 296, Including adjoining one half of the vacated alley at
the rear thereof, ~~Rough~~ Park Boulevard Subdivision, as recorded in Liber 53, Page 21 of Plats, Wayne County Records.

ROUSE

Sidwell No. Ward No. 22 Item No. 106267
CKA: 9336 Pierson

for the sum of Eighty Thousand and 00/100 Dollars \$(80,000.00)
subject to easements and building and use restriction of record and further subject to

Dated this February 28, 2007

Signed in presence of:

Signed by:

WOLVERINE STATE TITLE

15

John Miller

Marcia Miller

State of Michigan.

County of ~~Wayne~~ Oakland

The foregoing instrument was acknowledged before me this February 28, 2007, by
John Miller and Marcia Miller, husband and wife.

Notary Public, _____ County,
Michigan

My commission expires: _____

Acting in the County of _____

KEVIN HAMES
NOTARY PUBLIC, STATE OF MI
COUNTY OF OAKLAND
MY COMMISSION EXPIRES Feb 11, 2013
ACTING IN COUNTY OF ~~Oakland~~

When Recorded Return To:
Lue D. Jackson
Helen W. Jackson
9336 Pierson
Detroit, MI 48228

Send Subsequent Tax Bills To:
Grantee

Drafted By: Under the direction of:
Lue Jackson
9336 Pierson
Detroit, MI 48228

Tax Parcel #

Recording Fee \$

Transfer Tax \$688.00

*TYPE OR PRINT NAMES UNDER SIGNATURES.

WS740339

This is to certify that there are no tax liens or titles
on this property and that taxes are paid for FIVE
YEARS previous to date of this instrument.

This is to certify that there are no tax liens or titles
on this property and that taxes are paid for FIVE YEARS
previous to date of this instrument EXCEPT 2006 not examined
No. 1240 Date 4-10-2007
WAYNE COUNTY TREASURER Clerk W. Miller

MAR 16 2007

No. 2391 Clerk W. Miller
Treasurer, City of Detroit

OWNER'S POLICY OF TITLE INSURANCE

Issued by **Commonwealth Land Title Insurance Company**



Commonwealth Land Title Insurance Company is a member of the LandAmerica family of title insurance underwriters.

POLICY NUMBER
A14-0079880

SUBJECT TO THE EXCLUSIONS FROM COVERAGE, THE EXCEPTIONS CONTAINED IN SCHEDULE B AND THE PROVISIONS OF THE CONDITIONS AND STIPULATIONS HEREOF, COMMONWEALTH LAND TITLE INSURANCE COMPANY, a Pennsylvania corporation, herein called the Company, insures, as of Date of Policy shown in Schedule A, against loss or damage, not exceeding the amount of insurance stated in Schedule A, and cost, attorneys' fees and expenses which the Company may become obligated to pay hereunder, sustained or incurred by the insured by reason of:

1. Title to the estate or interest described in Schedule A being vested otherwise than as stated therein;
2. Any defect in or lien or encumbrance on such title;
3. Lack of a right of access to and from the land; or
4. Unmarketability of such title.

IN WITNESS WHEREOF, COMMONWEALTH LAND TITLE INSURANCE COMPANY has caused its corporate name and seal to be hereunto affixed by its duly authorized officers, the Policy to become valid when countersigned by an authorized officer or agent of the Company.

COMMONWEALTH LAND TITLE INSURANCE COMPANY

Attest:


Secretary



By:


President

EXCLUSIONS FROM COVERAGE

The following matters are expressly excluded from the coverage of this policy:

1. (a) Governmental police power.
(b) Any law, ordinance or governmental regulation relating to environmental protection.
(c) Any law, ordinance or governmental regulation (including but not limited to building and zoning ordinances) restricting or regulating or prohibiting the occupancy, use or enjoyment of the land, or regulating the character, dimensions or location of any improvement now or hereafter erected on the land, or prohibiting a separation in ownership or a change in the dimensions or area of the land or any parcel of which the land is or was a part.
(d) The effect of any violation of the matters excluded under (a), (b) or (c) above, unless notice of a defect, lien or encumbrance resulting from a violation has been recorded at Date of Policy in those records in which under state statutes deeds, mortgages, lis pendens, liens or other title encumbrances must be recorded in order to impart constructive notice to purchasers of the land for value and without knowledge; provided, however, that without limitation, such records shall not be construed to include records in any of the offices of federal, state or local environmental protection, zoning, building, health or public safety authorities.
2. Rights of eminent domain unless notice of the exercise of such rights appears in the public records at Date of Policy.
3. Defects, liens, encumbrances, adverse claims, or other matters (a) created, suffered, assumed or agreed to by the insured claimant; (b) not known to the Company and not shown by the public records but known to the insured claimant either at Date of Policy or at the date such claimant acquired an estate or interest insured by this policy and not disclosed in writing by the insured claimant to the Company prior to the date such insured claimant became an insured hereunder; (c) resulting in no loss or damage to the insured claimant; (d) attaching or created subsequent to Date of Policy; or (e) resulting in loss or damage which would not have been sustained if the insured claimant had paid value for the estate or interest insured by this policy.

OFFICIAL CHECK
Purchaser's Receipt

10-96/220

424486643

2/28/07



Comerica Bank

*****3,475.00**

WOLVERINE STATE TITLE

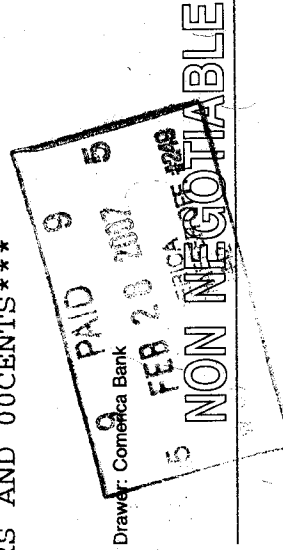
PAY
TO THE
ORDER OF

*****3,475*DOLLARS AND 00CENTS***

Dollars

00005/ 24905

REMITTER
Issued by Integrated Payment Systems Inc., Englewood, Colorado
To Citibank, N.A., Buffalo, NY



Sue Davis Jackson
Sue D. Jackson

John Miller
John Miller

Helen Williams Jackson
Helen W. Jackson

Marcia Miller
Marcia Miller

SETTLEMENT AGENT CERTIFICATION

The HUD-1 Settlement Statement which I have prepared is a true and accurate account of this transaction. I have caused the funds to be disbursed in accordance with this statement.

Sue Davis Jackson
Settlement Agent

2-28-07
Date

Warning: It is a crime to knowingly make false statements to the United States on this or any other similar form. Penalties upon conviction can include a fine and imprisonment. For details see: Title 18 U.S. Code Section 1001 and Section 1010.

Previous Editions are Obsolete

Page 3

form HUD-1 (3/86)
Handbook 4305.2

A. Settlement Statement

U.S. Department of Housing
and Urban Development

OMB No. 2502-0265

B. Type of Loan

1. ☐ FHA 2. ☐ FmHA 3. ☒ Conv Unins.
4. ☐ VA 5. ☐ Conv Ins. 6. ☐ Seller Finance6. File Number
40339WST7. Loan Number
4001297117

8. Mortgage Ins Case Number

C. Note: This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked "(p.o.c.)" were paid outside the closing; they are shown here for informational purposes and are not included in the totals.

D. Name & Address of Borrower
Lue David Jackson and Helen Williams-Jackson,
Husband and Wife
9336 Pierson
Detroit, MI 48228

E. Name & Address of Seller
John Miller and Marcia Miller, husband and
wife
P.O Box 3174
Farmington Hills, MI 48333

F. Name & Address of Lender
First Franklin Financial Corporation
33533 W. 12 Mile
Ste 290
Farmington Hills, MI 48331

G. Property Location

9336 Pierson
Detroit, MI 48228

H. Settlement Agent Name
Wolverine State Title, Inc.
28530 Orchard Lake Road
Suite 105
Farmington Hills, MI 48334 Tax ID:
Underwritten By: Commonwealth
Place of Settlement
Wolverine State Title, Inc.
28530 Orchard Lake Road
Ste. 105
Farmington Hills, MI 48334

I. Settlement Date
2/28/2007
Fund: 2/28/2007

J. Summary of Borrower's Transaction

100. Gross Amount Due from Borrower

101. Contract Sales Price	\$80,000.00
102. Personal Property	
103. Settlement Charges to borrower	\$4,552.19
104.	
105.	

Adjustments for items paid by seller in advance

106. City property taxes	
107. County property taxes	
108. Village/School Taxes	
109. Other	
110.	
111.	
112.	
113.	
114.	
115.	
116.	

120. Gross Amount Due From Borrower	\$84,552.19
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200. Amounts Paid By Or in Behalf Of Borrower

201. Deposit or earnest money	\$525.00
202. Principal amount of new loan(s)	\$76,000.00
203. Existing loan(s) taken subject to	
204. Loan Amount 2nd Lien	
205.	
206. Sellers Concessions	\$4,552.19
207.	
208.	
209.	

Adjustments for items unpaid by seller

210. City property taxes	
211. County property taxes	
212. Village/School Taxes	
213. Other	
214.	
215.	
216.	
217.	
218.	
219.	

220. Total Paid By/For Borrower	\$81,077.19
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300. Cash At Settlement From/To Borrower

301. Gross Amount due from borrower (line 120)	\$84,552.19
302. Less amounts paid by/for borrower (line 220)	\$81,077.19
303. Cash From Borrower	\$3,475.00

Section 5 of the Real Estate Settlement Procedures Act (RESPA) requires the following:

- HUD must develop a Special Information Booklet to help persons borrowing money to finance the purchase of residential real estate to better understand the nature and costs of real estate settlement services;
- Each lender must provide the booklet to all applicants from whom it receives or for whom it prepares a written application to borrow money to finance the purchase of residential real estate;
- Lenders must prepare and distribute with the Booklet a Good Faith Estimate of the settlement costs that the borrower is likely to incur in connection with the settlement. These disclosures are mandatory.

K. Summary of Seller's Transaction

400. Gross Amount Due to Seller

401. Contract Sales Price	\$80,000.00
402. Personal Property	
403.	
404.	
405.	

Adjustments for items paid by seller in advance

406. City property taxes	
407. County property taxes	
408. Village/School Taxes	
409. Other	
410.	
411.	
412.	
413.	
414.	
415.	
416.	

420. Gross Amount Due to Seller	\$80,000.00
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500. Reductions in Amount Due to Seller

501. Earnest money held by seller	\$525.00
502. Settlement Charges to Seller (line 1400)	\$1,492.00
503. Existing Loan(s) Taken Subject to	
504. Payoff of first mortgage loan	
505. Payoff of second mortgage loan	
506. Sellers Concessions	\$4,552.19
507.	
508.	
509.	

Adjustments for items unpaid by seller

510. City property taxes	
511. County property taxes	
512. Village/School Taxes	
513. Other	
514. Cash to Comerica acting as QI	\$73,430.81
515.	
516.	
517.	
518.	
519.	

520. Total Reduction Amount Due Seller	\$80,000.00
--	-------------

600. Cash At Settlement To/From Seller

601. Gross Amount due to seller (line 420)	\$80,000.00
602. Less reductions in amt. due seller (line 520)	\$80,000.00
603. Cash Seller	\$0.00

Section 4(a) of RESPA mandates that HUD develop and prescribe this standard form to be used at the time of loan settlement to provide full disclosure of all charges imposed upon the borrower and seller. These are third party disclosures that are designed to provide the borrower with pertinent information during the settlement process in order to be a better shopper.

The Public Reporting Burden for this collection of information is estimated to average one hour per response, including the time for reviewing instructions searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

The information requested does not lend itself to confidentiality.

L. Settlement Charges

700. Total Sales/Broker's Commission based on price				\$80,000.00	@ % = \$0.00	Paid From	Paid From
Division of Commission (line 700) as follows:						Borrower's	Seller's
						Funds at	Funds at
						Settlement	Settlement
701.	to						
702.	to						
703. Commission Paid at Settlement						\$0.00	\$0.00
800. Items Payable in Connection with Loan							
801. Loan Origination Fee	%	to	Reliable Mortgage Solutions			\$1,520.00	
802. Loan Discount	%	to					
803. Appraisal Fee		to	Metro Appraisal LLC POC (B) \$150.00				
804. Credit Report		to					
805. Lender's Inspection Fee		to					
806. Mortgage Insurance Application		to					
807. Assumption Fee		to					
808. Flood Cert. Fee		to	FIS Flood Services			\$9.00	
809. Administrator		to	First Franklin Financial Corporation			\$617.00	
810. Tax Service		to	First Franklin Financial Corporation			\$72.00	
811. Processing Fee		to	Reliable Mortgage Solutions			\$700.00	
812. Broker fee pd by Lender		to	Reliable Mortgage Solutions POC (L) \$1,520.00				
990. Items Required by Lender To Be Paid in Advance							
901. Interest from	2/28/2007	to	3/1/2007	@	\$22.5889/day	\$22.59	
902. Mortgage Insurance Premium for	months	to					
903. Hazard Insurance Premium for 1 years		to	Farmers Insurance Group			\$536.00	
1000. Reserves Deposited With Lender							
1001. Hazard insurance	months @		\$44.67	per month			
1002. Mortgage insurance	months @			per month			
1003. City property taxes	months @			per month			
1004. County property taxes	months @			per month			
1005. Village/School Taxes	months @			per month			
1006. Other taxes	months @			per month			
1007. Other taxes	months @			per month			
1008.	months @			per month			
1011. Aggregate Adjustment							
1100. Title Charges							
1101. Settlement or closing fee		to	Wolverine State Title, Inc.			\$400.00	
1102. Abstract or title search		to					
1103. Recording Fees		to	Wolverine State Title, Inc.			\$127.00	
1104. Title insurance binder		to					
1105. Document preparation		to	Wolverine State Title, Inc.				
1106. Notary fees		to					
1107. Attorney's fees		to					
(includes above items numbers:)							
1108. Title insurance		to	Wolverine State Title, Inc.			\$223.60	\$575.00
(includes above items numbers:)							
1109. Lender's coverage			\$76,000.00/\$223.60				
1110. Owner's coverage			\$80,000.00/\$575.00				
1111. Record Process Fee		to	Wolverine State Title, Inc.			\$20.00	
1112. Courier/Messenger Fee		to	Wolverine State Title, Inc.			\$15.00	
1113. Wire Fee		to	Wolverine State Title, Inc.			\$30.00	\$30.00
1114. 12/24 Month Letter		to	Wolverine State Title, Inc.			\$50.00	
1115. Tax Bill Fee		to	Wolverine State Title, Inc.				
1116. Record Deed		to	Wolverine State Title, Inc.				\$27.00
1117. Transfer Taxes		to	Wolverine State Title, Inc.				\$172.00
1200. Government Recording and Transfer Charges							
1201. Recording Fees	Deed ; Mortgage ; Rel	to					
1202. City/county tax/stamps	Deed \$88.00 ; Mortgage		to Wolverine State Title, Inc. FBO Government Agencies				\$88.00
1203. State tax/stamps	Deed \$600.00 ; Mortgage		to Wolverine State Title, Inc. FBO Government Agencies				\$600.00
1204. Tax certificates		to					
1300. Additional Settlement Charges							
1301. Survey		to	KemTech			\$110.00	
1302. Review Appraiser		to	Stephen A. Schmidt			\$100.00	
1400. Total Settlement Charges (enter on lines 103, Section J and 502, Section K)						\$4,552.19	\$1,492.00

I have carefully reviewed the HUD-1 Settlement Statement and to the best of my knowledge and belief, it is a true and accurate statement of all receipts and disbursements made on my account or by me in this transaction. I further certify that I have received a completed copy of pages 1, 2 and 3 of this HUD-1 Settlement Statement.

ITEMIZATION OF AMOUNT FINANCED

Borrower:

LUE DAVID JACKSON

HELEN WILLIAMS-JACKSON

Creditor:

FIRST FRANKLIN FINANCIAL CORP.,

AN OP. SUB. OF MLB&T CO., FSB

2150 NORTH FIRST STREET

SAN JOSE, CA 95131

9336 PIERSON ST

DETROIT, MI 48228

Loan Number: 4001297117

Date: 02/28/2007

Property Address: 9336 PIERSON ST
DETROIT, MI 48228

Term: 360

Rate: 10.7000

LTV: 95.00

Listed below is the ITEMIZATION OF AMOUNT FINANCED.

SALES PRICE: \$ 80000.00

LOAN AMOUNT: \$ 76000.00

ITEMIZATION OF PREPAID FINANCE CHARGES:

- Origination points 2.0000% to RELIABLE MORTGAGE SOLUTIONS LLC	1520.00
- Administration Fee to LENDER	617.00
- Flood Cert to FIS Flood Services	9.00
- Tax Service to LENDER	72.00
- Processing Fee to RELIABLE MORTGAGE SOLUTIONS LLC	700.00
- Prepaid Interest for (02/28/2007 - 03/01/2007)	22.59
- Settlement or Closing Fee to TITLE	500.00
- Title Insurance to TITLE	223.60
- Review Appraiser Fee to SCHMIDT, STEPHEN A.	100.00

TOTAL PREPAID FINANCE CHARGE: \$ 3764.19

AMOUNT FINANCED: \$ 72235.81

OTHER SETTLEMENT CHARGES:

AMOUNTS PAID TO OTHERS ON YOUR BEHALF BY CREDITOR -

- Broker Appraisal Fee to BROWN, TYRONE E.	150.00
- Recording Fees(Deed:\$150.00)	150.00
- Survey Fee to KEMTECH	110.00

TOTAL OTHER SETTLEMENT CHARGES: \$ 410.00

LOAN PROCEEDS: \$ 71825.81

Broker Fee Paid by Lender (POC) to RELIABLE MORTGAGE SOLUTIONS LLC \$1520.00

I (We) hereby acknowledge that I (we) have received and read a completed copy of the HUD Special Information Booklet "Settlement Cost", unless the loan being applied for is for refinancing the property.

If for any reason the loan I (we) have applied for does not close, and if permitted by applicable law, I (we) agree to reimburse the lender for any and all costs incurred to process my (our) application including, but not limited to: appraisal, survey, and title insurance.

LUE DAVID JACKSON

DATE

HELEN WILLIAMS-JACKSON

DATE



Sign Up Now to Save \$37,120.84 in interest payments!

The Equity Accelerator® Program
P.O. Box 6506
Englewood, CO 80155-6506

(800) 458-1564

If you have questions about your
mortgage please call 1-888-480-2432.

December 16, 2013

Reference #: 165949118
Enrollment Passcode: 522 98042

In reference to your property at:
9336 PIERSON ST

Lue Jackson
9336 Pierson St
Detroit, MI 48228-1508



Dear Lue Jackson:

Sometimes taking one simple step toward your goal can alter the course of your life. For example, if you use electronic transfers to *budget your mortgage around your paydays*, **you can easily save \$37,120.84 over the life of the loan in interest and pay off your mortgage 6 years faster** - without refinancing!

Buying your home was an important step toward achieving your financial goals. Now with the **Equity Accelerator®** program, you can save money, increase your ownership and achieve financial freedom much sooner! Your **\$37,120.84 savings** is based on your current mortgage information. Here is a customized example of how this system can work for you:

	Your Current Monthly Payment	Your New Payoff Schedule	Your Personal Financial Rewards
Payment Amount:	\$ 896.53 per month	\$ 450.77 every 2 weeks	Simplified Budgeting!
Total Interest Paid:	\$ 176,737.29	\$ 139,616.45	\$ 37,120.84 Saved!
Estimated Loan Payoff in:	23 years 1 month	16 years 10 months	6 Years 3 Months Early!
Total Principal Reduction After 10 years:	\$ 16,513.42	\$ 30,708.51	\$ 14,195.09 More Principal Reduction!

Our customers like this program because we do all the work while they enjoy the benefits. The cost for this service is just \$5.42 a month with a one time setup charge of \$295.00. Of course, it is possible for you to make extra payments on your own, but many of our customers find this difficult to do consistently. Here's how it will work for you:

1. This convenient payment system automatically transfers a portion of your loan payment electronically from your checking account at the same time that you get paid - typically every other week. ✓
2. These transfers are then applied by us to pay your mortgage based on your due date each month.
3. As you pay through this program, you actually accumulate extra funds that are **applied directly to your principal**.
4. The result is that your mortgage is paid down faster **without straining your budget** while saving you **\$37,120.84 in interest**.

To help you get started, we have even included a customized **Estimated Personal Savings Analysis** on the back of this page to show you just how big your savings can be. Simply review it and give one of our specialists a call at **(800) 458-1564** between 8:00 AM – 9:00 PM (ET), Monday through Friday. **You have nothing to lose and so much to gain - \$37,120.84!**

Yours truly,

Equity Accelerator Enrollment Center

**P.S. What are you waiting for? Take a simple step to
change your future and call (800) 458-1564 to sign up!**



Member FDIC

To reference your loan information any time visit <http://nationstarmtg.com/> and to view available payment options visit <https://www.nationstarmtg.com/MyAccount/PaymentOptions.aspx>. This program and the services undertaken by Nationstar Mortgage LLC in no way alter or lessen Customer's obligations under Customer's existing mortgage contract regarding the amount of the monthly payments, when payments are due, the application of payments, the assessment of late charges or the calculation of delinquencies. The Equity Accelerator Program is offered by Nationstar Mortgage LLC under an agreement with Paymap Inc. We provided certain information about you and your mortgage to Paymap so Paymap could assist us in offering the program to you.

Detach Here

775244

Estimated Personal Savings Analysis

Lue Jackson, here's your Personal Savings Analysis...

Summary of Your Program Savings

Interest Savings: \$ 37,120.84
Term Reduction: 6 Years 3 Months
Total Principal Reduction Advantage: \$ 14,195.09 Additional Total Principal Reduction in 10 Program Years

Reference #: 165949118
Prepared as of: 11/15/2013

Your Current Home Loan

Monthly Principal/Interest: \$ 706.59
Escrow/Other Accounts: \$ 189.94
Monthly Payment: \$ 896.53

Bi-Weekly Transfer: \$ 450.77
Loan Origination Date: 28-Feb-2007
Loan Origination Term: 30 Years
Loan Payment Due Date: 01

PLEASE NOTE: Recent payment changes (if any) may not be included.

Loan Type: Fixed
Current Interest Rate: 10.700%
Current Loan Balance: \$ 72,434.65
Original Loan Balance: \$ 76,000.00

Estimated Activity to Date:

Principal Paid to Date: \$ 3,565.35
Interest Paid to Date: \$ 53,819.82
Total Payments to Date: \$ 57,385.17

Your Existing Payment

vs.

The Equity Accelerator® Program

Program Year	Existing Total Principal Reduction	Accelerated Total Principal Reduction	Accelerated Total Principal Reduction Advantage	Cumulative Interest Saved
5	\$ 8,354.89	\$ 13,151.08	\$ 4,796.19	\$ 1,056.80
10	\$ 16,513.42	\$ 30,708.51	\$ 14,195.09	\$ 5,973.05
15	\$ 30,410.70	\$ 60,615.91	\$ 30,205.21	\$ 17,500.53
16	\$ 37,669.03	\$ 76,000.00	\$ 38,330.97	\$ 24,220.04
20	\$ 54,083.38	\$ -----	\$ -----	\$ 34,656.11
23	\$ 76,000.00	\$ -----	\$ -----	\$ 37,120.84

Your Interest Savings

\$37,120.84

The one-time Enrollment Fee is \$295.00 (collected from your first extra principal payment) and the monthly participation fees are \$5.42 (a portion is collected with each electronic withdrawal). That's a small amount compared to your projected interest savings of \$37,120.84. There is no fee for payment changes or cancellation and you can transfer the program to another loan. Interest savings shown above are after providing for fees.

This statement is to be used for comparative purposes only. No guarantee or warranty is made with respect to the accuracy of the contents or the use of this statement with regard to financial investments. This estimate of benefits may change due to adjustments in loan interest rate, monthly tax and insurance amount, additional principal payments, delinquencies, withdrawal cycle, termination, suspension or if calculated on a different date.

ATTENTION TEXAS RESIDENTS:

COMPLAINTS REGARDING MORTGAGE BANKERS SHOULD BE SENT TO THE DEPARTMENT OF SAVINGS AND MORTGAGE LENDING, 2601 NORTH LAMAR, SUITE 201, AUSTIN, TEXAS 78705. A TOLL-FREE CONSUMER HOTLINE IS AVAILABLE AT 1-877-276-5550.

THE DEPARTMENT MAINTAINS A RECOVERY FUND TO MAKE PAYMENTS OF CERTAIN ACTUAL OUT OF POCKET DAMAGES SUSTAINED BY BORROWERS CAUSED BY ACTS OF LICENSED RESIDENTIAL MORTGAGE LOAN ORIGINATORS. A WRITTEN APPLICATION FOR REIMBURSEMENT FROM THE RECOVERY FUND MUST BE FILED WITH AND INVESTIGATED BY THE DEPARTMENT PRIOR TO THE PAYMENT OF A CLAIM. FOR MORE INFORMATION ABOUT THE RECOVERY FUND, PLEASE CONSULT THE DEPARTMENT'S WEBSITE AT WWW.SML.TEXAS.GOV.

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0062212 01 AT 0.381 **AUTO T1 2 1850 48228-1508

MSR L2 AG 1000-----0-2--- M24262 IN P62274

LUE DAVID JACKSON

HELEN WILLIAMS JACKSON

9336 Pierson St

Detroit MI 48228-1508



Home loan overview

Principal Balance	\$72,730.28
Escrow balance	-\$893.01



FOR CUSTOMER SERVICE: 1.800.669.6607

Sign Up For Account Alerts

With Bank of America, N.A. PayPlan Services, you don't need to receive monthly paper statements anymore! You can get something you may find of more value—**Account Alerts**. These timely emails help in many ways. They:

- **Confirm** when your payment has posted
- **Keep you up-to-date** on important account information

So visit www.bankofamerica.com from a personal computer and sign up for Account Alerts today!

Payments and amounts due summary

Current payment due on 07/01/2013 as of 06/03/2013

Principal and/or interest payment	\$706.59
Escrow payment amount	\$189.94
Payment due on 07/01/2013	\$896.53
Next Payment Posting 07/01/2013	\$896.53
Late charge of \$35.32 if payment received after 07/16/2013	
If payment received after 07/16/2013	\$931.85

Payment due does not include any past due payments, outstanding late charges or fees due.

IMPORTANT
NEWS

Sign Up For Account Alerts

With Bank of America, N.A. PayPlan Services, you don't need to receive monthly paper statements anymore! You can get something you may find of more value—**Account Alerts**. These emails may help you in several ways. They:

- **Confirm** when your payment has posted
- **Keep you up-to-date** on important account information

So visit www.bankofamerica.com from a personal computer and sign up for Account Alerts today!

Home loan details

Loan type and term

Loan type	30 Yr Conventional
Contractual remaining term	23 Years, 9 Months
Interest rate	10.700%

Upcoming dates to remember

*Next payment draft date	07/01/2013
*Payment drafts will not occur if your loan is delinquent.	

Property related expenses

With the exception of the items marked with an asterisk (*), we are responsible for the payment of the following items, which are included in your escrow account. The payment of the items marked with an asterisk (*) is the responsibility of the homeowner.

Description	Payee	Policy number/Tax ID	Frequency	Next due date	Amount due
* Homeowners insurance	Michigan Basic Property Ins	2311223104	Annual	03/17/2014	\$1,123.00
City taxes	Detroit City Treasurer	22106267.	Annual	12/01/2013	\$1,007.92
City taxes	Detroit City Treasurer	22106267.	Annual	07/01/2013	\$692.55



If you have an escrow account, please do not mail in your current tax bill. We will work with your Tax Collector to pay taxes on time. If you received an Interim, Delinquent, Supplemental, Corrected or Adjusted bill, please write your account number on the bill and mail it to the attention of: BAC Tax Services Corporation, Attn: Tax Dept CA6-913-LB-01, PO Box 10211, Van Nuys, CA 91410-0211.

Recent home loan activity

Date	Description	Principal	Interest	Escrow	Total
06/03/2013	June payment	\$57.57	\$649.02	\$189.94	\$896.53
	**Ending balance	\$72,730.28		-\$893.01	

**NOTE: The ending balance is probably not the same as the amount to pay off your loan. For payoff information, you may use our 24-hour automated information system at 1.800.669.5833.

To contact us

Online www.bankofamerica.com
Phone 1.800.669.6607 (English)
 1.800.295.0025 (Español)
 TDD 1.800.300.6407
 Monday-Friday 7a.m. - 7p.m. Local Time
 Calls may be monitored or recorded to ensure quality service.
Mail General Inquiries (Other Than QWRs)
 Bank of America, N.A.
 PO Box 5170
 Simi Valley, CA 93062-5170

Please Note: New Mailing Address

Qualified Written Requests (QWR) (as defined in Section 6 of RESPA & Section 3500.21 of Regulation X)
 PO Box 942019
 Simi Valley, CA 93094-2019

To mail a payment

Bank of America, N.A.
 PO Box 15222
 Wilmington, DE 19886-5222
 Payments can also be made by Phone, Online, or at any Bank of America Banking Center.

To mail a payment by overnight mail*

Bank of America, N.A.
 Retail Payment Services, DE5-023-03-04, Christiana III,
 900 Samoset Drive
 Newark, DE 19713-6002
 *Accepts overnight mail only.
 In-person payments are not accepted at this address.

Insurance Matters

Insurance Dept, PO Box 961291
 Fort Worth, TX 76161-0291



Property address
9336 Pierson St.Lue David Jackson
Helen Williams Jackso

ent goes into an account to pay for your property taxes and insurance premiums. During the year, payments are bills come due. This notice describes any changes needed in your monthly payment to maintain enough money in se bills. In our step-by-step analysis, we determine the data shown below to calculate your new escrow payment.

ch step of your escrow analysis

• side-by-side comparison of last year's projected and actual data

1) The expected monthly amount needed to pay your property taxes and insurance premiums	\$141.71
The monthly amount you must pay into your escrow account to keep the balance from falling below zero during the year	\$42.09
2) The monthly amount allowed by federal law for unexpected tax and insurance increases and other costs	\$6.14
see Step 4)	\$189.94
it effective 03/2013 (see Step 4)	\$896.53

OW PAYMENT

ed for the year

Amount needed	Frequency in months	Monthly amount needed
\$1,007.92	12	\$83.99
692.55	12	57.71
ount		\$141.71

alance

roject the amounts you will pay into your escrow account next year and the amounts we will pay out for your er, these figures are only projections and may not reflect the actual payments made at the time they are due.

ow sit(s)	Tax payment(s)	Insurance payment(s)	MIP/PMI payment(s)	Balance
				-\$1,652.77
41.71				-1,511.06
41.71				-1,369.35
41.71				-1,227.64
41.71				-1,085.93
41.71	692.55			-1,636.77
41.71				-1,495.06
41.71				-1,353.35
41.71				-1,211.64
41.71				-1,069.93
41.71	1,007.92			-1,936.14 *
41.71				-1,794.43
41.71				-1,652.72
				-\$1,652.72
				-\$1,936.14
				\$42.09

America, N.A. assumes that all scheduled mortgage payments will be made to the effective

ed by your financial institution,

by your anticipated shortage in full. (See Step 4 for more information.)

of a reserve amount to maintain a cushion for unexpected tax and/or insurance increases and other costs. shown below.

2 above)	-\$1,936.14	
the base amount) *	282.28	
	282.28	
28 divided by 46)		\$6.14
	\$0.00	

payments anticipated to be paid out of the escrow account during the year but excludes PMI/MIP amounts.

Payments		
for insurance (see Step 1)	\$141.71	
	42.09	
	6.14	
		\$189.94
Payment		
	\$706.59	
	189.94	
Effective 03/2013		\$896.53
In full, your payment will be reduced by the shortage amount of \$42.09, leaving you with a payment of		

Previous Balance	Monthly	
	Last analysis	This analysis
	\$34.39	\$83.99
	57.71	57.71
	\$92.10	\$141.71
	28.42	42.09
	3.60	6.14
	.00	.00
	\$124.12	\$189.94
	\$706.59	\$706.59
	124.12	189.94
	\$830.71	\$896.53

it increased. Your reserve percentage remained unchanged. Your reserve payment increased. The result was a shortage payment to increase. Additionally, you were left with a(n) shortage.

Your projected escrow account activity and actual activity can be found below.