

## BANK OF AMERICA MORTGAGE FRAUD

COMPLAINT

DISPUTE OF DEBIT/VALIDATION OF DEBT

RICO VIOLATIONS

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Gregory P. LaPorta  
7260 Early Pioneer Ave  
Las Vegas, NV 89129

Nevada Attorney General  
Attn: Catherine Cortez Masto  
Grant Sawyer Building  
555 E. Washington Ave, Suite 3900  
Las Vegas, NV 89101

RE: Bank of America Consumer Complaint - File Date: 1/20/2012  
Additional Discovery for the Complaint

Certified Mail # 7196 9009 2720 0906 7457

Date: March 29, 2012

Dear Catherine:

On January 11, 2012, I met with your Compliance Investigator with the Bureau of Criminal Justice. I filed a Consumer Complaint with the Bureau of Consumer Protection on January 20, 2012.

At the direction of my attorney, Mathew Callister of Callister & Associates, I filed a civil complaint against Bank of America in the U.S. District Court in Las Vegas. (Case No: 2:2011cv01094) on July 1, 2011. **A judgment in my case was made on March 20, 2012 in Bank of America's favor. I should remind you that a hearing took place and I wasn't invited.**

**The U.S. District Court never answered the specifics of my complaint (it's evident the court "looked" the other way and made a decision on their own instead of granting my request for a "trial by jury").** Obviously, the judge never looked at a loan file. Is it because no loan file exists? Or is it because the judge couldn't get a copy of it, which would prove a broken chain of title as well as their other deceptive trade practices? Did the judge closely review the paperwork submitted by the attorneys for Bank of America last year? **Is this American Justice or "Just Us", Bank of America? The cover-up continues...**

**Bank of America was very successful in covering up the securitization failures by Countrywide to a U.S. District Court. Their attempt to cover-up mistakes with lies is the worst and it needs to be exposed.** I discussed some of the following with your Compliance Investigator back on January 11th:

- Take a closer look at the Assignment of Deed of Trust's filed by First Horizon Home Loans to Countrywide Bank FSB, recorded in the Clark County, Nevada Recorder's Office on July 29, 2008. **Further review shows the instrument numbers listed within each Assignment of Deed of Trust does not belong to my property:**
  - Instrument Number: 20080729-0002836 contains an Assignment of Deed of Trust filed by First Horizon Home Loans. The assignment states, "... to the Equity Title of Nevada, Trustee and recorded on 3/3/08 as Instrument No. 20080225-0004107, in Book \_\_, Page \_\_ of Official Records in the County Recorder's Office of Clark County, Nevada, describing

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- land therein ...". The Instrument No. 20080225-0004107 belongs to RL HOMES LLC / DIRECT GRADING & PAVING LLC which is a LIS PENDENS document recorded on 2/25/2008 2:43:55 PM for Parcel # 125-08-220-018.
- Instrument Number: 20080729-0002837 contains an Assignment of Deed of Trust filed by First Horizon Home Loans. The assignment states, "... to the Equity Title of Nevada, Trustee and recorded on 3/3/08 as Instrument No. 20080225-0004108, in Book \_\_, Page \_\_ of Official Records in the County Recorder's Office of Clark County, Nevada, describing land therein ...". The Instrument No. 20080225-0004108 belongs to IRVINA RAYMOND / TRAVIS ASSOCIATES LP which is a JUDGEMENT document recorded on 2/25/2008 2:46:16 PM with no Parcel # listed.
  - On August 19, 2011, in a response to a motion in my civil case, the attorneys for Bank of America filed Exhibit C with the U.S. District Court showing these same non-factual notarized mortgage assignments. **Why would attorneys for Bank of America be filing non-factual notarized mortgage assignments with a U.S. District Court? Why would the attorneys for Bank of America be so quick to respond with a "Motion to Dismiss" the case back on September 20, 2011? Did the attorneys for Bank of America just commit perjury in a U.S. District Court?**
  - On December 22, 2011, Bank of America filed a "Corporation Assignment of Deed of Trust", recorded in the Clark County, Nevada Recorder's Office. **Why is Bank of America filing a "Corporation Assignment of Deed of Trust" now after more than 3 years all while my federal case was pending?**
    - The instrument number listed in the "Corporate Assignment of Deed of Trust" corresponds with the Deed of Trust filed on March 3, 2008 for the first mortgage by First Horizon Home Loans. Bank of America made no recording of the 2<sup>nd</sup> mortgage or it's "Deed of Trust".
    - The "Corporation Assignment of Deed of Trust" states, "For value received", however the recording states a value of \$0.00. Bank of America never disclosed the value received.
    - The "Corporation Assignment of Deed of Trust" does not state who the owner of the note is. Bank of America claims through numerous letters to me that Fannie Mae is the owner of the loan. So, if Fannie Mae is the owner of the loan (and the only one that could legally foreclose on my property), why is there no recording of this in public records by Fannie Mae to Bank of America (Richard R. Powell, Powell on Real Property section 37.27)?
  - On December 23, 2011, Blank Rome LLP, a law firm representing Bank of America sent me a letter. The letter makes reference to the first mortgage but does not state the 2<sup>nd</sup> mortgage. There is no title of the person signing this letter. It is a wet ink signature. A similar letter from Blank Rome LLP was sent to me on March 15, 2011. That letter made reference to the 1<sup>st</sup> and 2<sup>nd</sup> mortgages.

Catherine, if you wish to discuss any of this with me, directly my contact information is as follows:

Work:

Office of the District Attorney  
Criminal Division – DAIT  
Clark County, Nevada

Home:

(702) 997-1971

**BANK OF AMERICA MORTGAGE FRAUD**

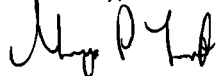
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Direct: (702) 671-0964

Sincerely,



Gregory P. LaPorta

Homeowner

**CC:**

**Callister & Associates**

Matthew Q. Callister, Esq.  
823 Las Vegas Blvd. South, 5<sup>th</sup> Floor  
Las Vegas, NV 89101

**Bank of America Corporate Center**

**Office of the President & CEO**  
100 North Tryon Street  
Charlotte, NC 28255

**Securities & Exchange Commission**

Los Angeles Regional Office  
Rosalind Tyson, Regional Director  
5670 Wilshire Boulevard, 11th Floor  
Los Angeles, CA 90036-3648

**Las Vegas Metropolitan Police Department  
Financial / Property Crimes Section**

3141 Sunrise Avenue  
Las Vegas, NV 89101

**Office of the District Attorney**

**Clark County, Nevada**  
Attn: Steven B. Wolfson, District Attorney  
200 Lewis Ave  
Las Vegas, NV 89101

**KLAS-TV**

3228 Channel 8 Drive  
Las Vegas, NV 89109

**MSNBC**

Attn: Dylan Ratigan  
30 Rockefeller Plaza  
New York, NY 10112

**U.S District Court – Las Vegas**

Case # 2:2011cv01094  
333 S. Las Vegas Blvd.  
Las Vegas, NV 89101

**Comptroller of the Currency  
Administrator of National Banks**

Case # 1263610 & 1278836 & 01463995  
1301 McKinney Street, Suite 3450  
Houston, TX 77010-9050

**Fannie Mae**

3900 Wisconsin Avenue, N.W.  
Washington, DC 20016

**Clark County, Nevada Recorder's Office**

Attn: Debbie Conway, Recorder  
500 South Grand Central Parkway 2nd Floor  
Las Vegas, Nevada 89155

**Las Vegas Sun**

Attn: Letter to the Editor  
2360 Corporate Circle, Third Floor  
Henderson, NV 89074

**KTNV Channel 13 Action News**

3355 S. Valley View Blvd.  
Las Vegas, NV 89102

**Rolling Stone**

Attn: Matt Taibbi  
1290 Avenue of the Americas  
New York, NY 10104-0298