

AN OPEN LETTER AND DISCIPLINARY COMPLAINT TO THE ATTENTION OF  
THE NEW JERSEY SUPREME COURT

August 23, 2011

Honorable Stuart Rabner,  
Chief Justice  
The Supreme Court of New Jersey  
Richard J. Hughes Justice Complex  
25 Market Street P.O. Box 023  
Trenton, NJ 08625-0023  
Certified # 7007 0220 0001 5974 1315

RE: Wells Fargo v Bailey (pro se) – The Nightmare Case !  
Superior Court of New Jersey, Essex County Chancery Division # F-11202-06

Dear Chief Justice Rabner:

This letter serves as a disciplinary complaint against the below named New Jersey attorneys who work or worked at Zucker Goldberg & Ackerman, because of their conduct and misconduct while serving as legal representatives of Wells Fargo Bank in the above referenced case:

- 1) Leonard B. Zucker, Esq.  
<http://www.martindale.com/Leonard-B-Zucker/1104566-lawyer.htm>
- 2) Richard P. Haber, Esq.  
<http://www.martindale.com/Richard-P-Haber/36301966-lawyer.htm>
- 3) Anthony J. Risalvato, Esq.  
<http://www.martindale.com/Anthony-J-Risalvato/4312686-lawyer.htm>
- 4) Steven D. Krol, Esq.  
<http://www.martindale.com/Steven-D-Krol/1113157-lawyer.htm>

Attorneys are servants of the Courts, and also represent a Higher Authority. They are not to turn blind eyes to the obvious fraud of their predator client, even when acknowledging that fraud would gut their case. All of the named attorneys knew, or should have known, that Wells Fargo Bank's alleged title documents to my property were fraudulent.

Wells Fargo and other Baron Banks have no hands or feet. Their dastardly deeds are performed by humans, at the behest of, or with the wink-nod approval of, corporate decision makers. Attorneys are

among the most culpable malfeasors and misfeasors leading to the global financial crisis of 2008 and 2009. The four attorneys named in the body of this Complaint bear their share of the blame, and are due their portion of discipline.

See – “Judges Berate Bank Lawyers in Foreclosures” by John Schwartz of New York Times  
<http://www.nytimes.com/2011/01/11/business/11lawyers.html?pagewanted=all>

In the my case, Wells Fargo Bank performed a customized Robo-signing that is preserved for posterity in Essex County New Jersey (USA) Record Book #12058, Page # 8263. Initially Zucker Goldberg’s attorneys filed no documents verifying Wells Fargo’s legal interest in my property. When pressed for evidence, the named Wells Fargo’s attorneys produced not 1, but 2 Assignments ! “You don’t like the fit of Assignment #1 ? Well, let’s try on Assignment #2 for size !!!” Assignment #1 was flawed/suspect/insufficient. Assignment #2 was forged and backdated 19 MONTHS !!! It took more than 3 years, and my case went back and forth through 5 courts, because of various tactics of Mistrs Zucker, Haber, and Risalvato. In the end Mr. Krol continually stalled and finally did a no-show. My case bit the dust. Judge Kenneth S. Levy dismissed the case. Wells Fargo sent me a letter threatening to re-file. I’m still waiting !

“Reprehensible” is the word that best depicts the behavior and attitude of Mistrs Zucker, Haber, Risalvato, and Krol during the course of this litigation. Accustomed to business-as-usual, and anything goes, these attorneys ignored the obvious errors, flaws and inconsistencies in Assignments #1 and #2. They brazenly attempted to ram their way through a sham foreclosure, dismissing fact and law. How dare Wells Fargo concoct/re-create Assignments to pass-off on the Courts of New Jersey and an urban minority homeowner ! That takes lots of nerve, among other things. In fact, Assignment #2 was supposedly executed by an attorney-in-fact for a defunct loan company. Is there any shame ?

At one point Mr. Haber intentionally failed to notify me of a court hearing. Unlike the Rocket-Docket judges, Judge Levy had his clerk call me on the date of the hearing to determine why I was not in court. Upon learning that I had not received a Notice, Judge Levy rescheduled the hearing. On numerous occasions various attorneys dated court filings days before actually filing them, and then postmarked them at even later dates. This “tactic” or shenanigan shortened my actual response time and placed me in danger of not timely preparing and filing response documents.

And the beat goes on ...

I appear on a photo collage with millions of homeowners caught up in the grasp of greedy, heartless, and impatient mega banks. We each share similar horror stories. Now all of America has been ensnared in the dragnet of carnivorous Bank sharks. But urban minority homeowners occupy Ground Zero, the epicenter of the foreclosure explosion and the Great Recession. Many of them will never regain their financial footing. Time’s up for cavalier, slip-shod litigation practices ! Wells Fargo and its legal representatives have been sanctioned and fined in courts all over America. Why don’t they get it ???

I have closely followed the developments related to New Jersey Supreme Court's examination of banks' foreclosure policies and practices.

<http://www.judiciary.state.nj.us/superior/documents.htm>

I applaud the Supreme Court and Attorney General Paula Dow for their efforts to rein in callous, presumptuous banks. However, I am not persuaded that much will change going forward except that banks and their attorneys will be more careful about getting caught. There is now documentation by the truckload that 10,000+ attorneys all over America had/have no qualms about filing tens of millions of court documents filled with out and out falsehoods. One lawyer lies, and another swears to it ! So what is the difference now that all 50 State Attorney Generals are peeking under the covers ??? Not one thing except the higher billing rates of the multiple liars !!! If lawyers sworn to uphold the law and function as servants of the Court would perpetrate frauds for a \$100,000 home, how much greater is their motivation to protect their pay checks and the entire predatory lending industry ???

Prayers to God have kept me in my home. I now pray that the Justices of the New Jersey Supreme Court possess the discernment and wisdom of Solomon, with the boldness of Elijah, to call spades, spades. For years and years the named attorneys and law firm Zucker Goldberg have handled and mishandled Kuzillions of foreclosures on behalf of Wells Fargo and other big volume predatory banks. It is highly unlikely that my case was a fluke. I smell RICO !!! Greed and lies of gluttonous banks have mercilessly robbed people of their homes, and broken the spirits of millions of trusting Americans, especially of urban minorities. Enough is enough ! Our cries have touched the heart of the Lords of Lord. I therefore beseech the New Jersey Supreme Court to closely examine the egregious/illegal practices of Mistrs Zucker, Haber, Risalvato, and Krol, and exact such discipline as is warranted to punish them and to deter others.

Thanks in advance for your thorough investigation into this case. I will be happy to appear and answer questions related to this complaint.

Sincerely,

Carolyn Bailey

<http://HurtingHomeOwners.com>

<http://Twitter.com/HurtinHomeOwner>

[HurtingHomeOwner@aol.com](mailto:HurtingHomeOwner@aol.com)