APPENDIX

TABLE OF APPENDICES

APPENDIX A — ORDER OF THE SUPREME COURT OF THE STATE OF DELAWARE, FILED MAY 21, 2024

IN THE SUPREME COURT OF THE STATE OF DELAWARE

No. 155, 2024

Court Below—Court of Chancery of the State of Delaware

C.A. No. 2023-0536

WITTAYA THEERACHANON,

Plaintiff Below, Appellant,

v.

FIA CARDS SERVICES AND TENAGLIA & HUNT, P.A., LLP,

Defendants Below, Appellees.

Submitted: May 17, 2024
Decided: May 21, 2024

Before **VALIHURA**, **TRAYNOR**, and **LEGROW**, Justices.

ORDER

After consideration of the documents filed by the appellant, it appears to the Court that:

(1) On May 8, 2024, this Court dismissed the appeal filed by the plaintiff below-appellant, Wittaya

Theerachanon, from a Court of Chancery Magistrate's final report dismissing Theerachanon's amended complaint ("May 8, 2024 Order").[1] In the absence of a stipulation by the parties to submit their dispute to a Magistrate for a final decision under 10 *Del. C.* § 350 or an order by the Court of Chancery adopting the Magistrate's final report under Court of Chancery Rule 144(c), this Court lacked jurisdiction to consider Theerachanon's appeal.[2]

(2) On May 9, 2024, the Chancellor directed the Magistrate to conduct a procedural review of exceptions Theerachanon filed to the Magistrate's final report on May 6, 2024 and to recommend whether the exceptions should be considered in an addendum to the final report. The Chancellor also assigned a Vice Chancellor to consider any exceptions that were filed to the Magistrate's addendum. On May 9, 2024, the Magistrate entered an addendum recommending that Theerachanon's exceptions to the final report be dismissed as untimely. The deadline for Theerachanon to file exceptions to the addendum is May 23, 2024.

(3) On May 17, 2024, Theerachanon filed the following documents in this appeal:

- A motion for recusal;

- A motion opposing the order of dismissal;

---

1. *Theerachanon v. FIA Cards Servs.*, 2024 Del. LEXIS 163, 2024 WL 2073629 (Del. May 8, 2024).

2. *Id.* at *1.

- A motion for default judgment; and

- A notice of appeal from interlocutory order.

(4) In the motion for recusal, Theerachanon seeks the recusal of the Justices who decided the May 8, 2024 Order. Theerachanon claims that the Justices are biased against her because the May 8, 2024 Order was issued on the same day as the Magistrate's addendum and relied inappropriately on information in the addendum. This claim is without merit. The May 8, 2024 Order dismissing Theerachanon's appeal for this Court's lack of jurisdiction to consider her appeal of the Magistrate's final report was issued the day *before* the Magistrate issued the addendum recommending that Theerachanon's exceptions to the final report be dismissed as untimely. The May 8, 2024 Order did not depend or rely upon the Magistrate's addendum. Having engaged in the two-part analysis set forth in *Los v. Los*,[3] the Justices are satisfied that they can preside over this appeal in a manner free from any bias or prejudice and that there is no objective appearance of partiality.

(5) The Court construes the motion opposing the order of dismissal as a motion for reargument of the May 8, 2024 Order. Having considered the motion, the Court concludes that the motion is without merit and should be denied.

3. 595 A.2d 381, 384-85 (Del. 1991) ("[T]he judge is required to engage in a two-part analysis. First, he must, as a matter of subjective belief, be satisfied that he can proceed to hear the cause free of bias or prejudice concerning that party. Second, even if the judge believes that he has no bias, situations may arise where, actual bias aside, there is the appearance of bias sufficient to cause doubt as to the judge's impartiality.").

(6) In moving for default judgment, Theerachanon relies upon Supreme Court Rule 55, which she describes as allowing a party to move for default judgment when the party against whom judgment is sought fails to appear, plead, or otherwise defend. She is mistaken. Supreme Court Rule 55 grants certain attorneys limited permission to practice in public programs. Nothing in this Court's Rules provides for a party to file a motion for default judgment. To the extent Theerachanon is relying upon Court of Chancery Rule 55, which does provide for a party to move for default judgment, she must file a motion for default judgment in the Court of Chancery in the first instance.

(7) Finally, Theerachanon purports to file an interlocutory appeal from the Magistrate's final report. She has not complied with the requirements of Rule 42. Under Rule 42, Theerachanon was required to file an application for certification of an interlocutory appeal in the Court of Chancery within ten days after entry of the Magistrate's final report on April 2, 2024,[4] but she did not do so. Theerachanon also was required to file a notice of interlocutory appeal in this Court within thirty days after entry of the Magistrate's final report on April 2, 2024,[5] but she did not file the notice of interlocutory appeal until May 17, 2024. The notice of interlocutory appeal must be dismissed *sua sponte* under Rule 29(c).[6]

4. Supr. Ct. R. 42(c)(i).

5. Supr. Ct. R. 42(d)(i).

6. Supr. Ct. R. 29(c) (providing for involuntary dismissal, *sua sponte*, without prior notice when the appeal manifestly fails on its

NOW, THEREFORE, IT IS ORDERED, that the motions are DENIED and the notice of interlocutory appeal is DISMISSED.

BY THE COURT:

/s/ Gary F. Traynor
Justice

face to invoke the jurisdiction of the Court and where the Court concludes, in the exercise of its discretion, that the giving of notice would serve no meaningful purpose and that any response would be of no avail).

APPENDIX B — ORDER OF THE SUPREME COURT OF THE STATE OF DELAWARE, FILED MAY 8, 2024

IN THE SUPREME COURT OF THE
STATE OF DELAWARE

No. 155, 2024

Court Below—Court of Chancery
of the State of Delaware

C.A. No. 2023-0536

WITTAYA THEERACHANON,

Plaintiff Below, Appellant,

v.

FIA CARDS SERVICES AND TENAGLIA
& HUNT, P.A., LLP,

Defendants Below, Appellees.

Submitted: April 23, 2024
Decided: May 8, 2024

Before **VALIHURA**, **TRAYNOR**, and **LEGROW**, Justices.

ORDER

After consideration of the notice to show cause and the response, it appears to the Court that:

(1) On April 2, 2024, a Court of Chancery Magistrate issued her final report under Court of Chancery Rule 144 dismissing the amended complaint filed by the plaintiff

below-appellant, Wittaya Theerachanon. In the final report, the Magistrate advised that exceptions to the report and all prior reports had to be filed within eleven days. No exceptions have been filed.

(2) On April 16, 2024, Theerachanon filed a notice of appeal from the Magistrate's final report in this Court. The Clerk's Office issued a notice directing Theerachanon to show why this appeal should not be dismissed because the Magistrate's April 2, 2024 final report had not been approved and entered as a final order of the court as provided in Court of Chancery Rule 144(c).

(3) In response to the notice to show cause, Theerachanon argues the merits of the appeal. The response does not address the jurisdictional defect.

(4) In the absence of a stipulation by the parties to submit their dispute to a Magistrate for final decision under 10 *Del. C.* § 350 or an order by the Court of Chancery adopting the Magistrate's final report under Court of Chancery Rule 144(c), this Court lacks jurisdiction to hear an appeal from a Magistrate's order.[1] The parties did not

1. *Appleby Apartments LP v. Appleby Apartments Assocs., L.P.*, 2024 WL 851809, at *2 (Del. Feb. 29, 2024) (holding the Court lacked jurisdiction over an appeal from a Magistrate's order where the order had not been adopted by the Chancellor or a Vice Chancellor under Rule 144(c) and the parties had not stipulated to final adjudication of their matter by a Magistrate); *Timco v. Allied World*, 2023 Del. LEXIS 425, 2023 WL 8739455, at *1 (Del. Dec. 18, 2023) (dismissing appeal from a Magistrate's dismissal order in matter in which there was no adoption of the Magistrate's dismissal order by the Chancellor or a Vice Chancellor under Rule 144(c) and there was no stipulation under 10 *Del. C.* § 350).

stipulate to submit their dispute to a Magistrate for a final decision. Nor has the Court of Chancery entered an order adopting the Magistrate's final report. Accordingly, this appeal must be dismissed.

NOW, THEREFORE, IT IS ORDERED, under Supreme Court Rule 29(b), that this appeal is DISMISSED.

BY THE COURT:

/s/ Gary F. Traynor
Justice

APPENDIX C — ADDENDUM TO FINAL REPORT IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE, EFILED MAY 9, 2024

IN THE COURT OF CHANCERY
OF THE STATE OF DELAWARE

C.A. No. 2023-0536-BWD

WITTAYA THEERACHANON,

Plaintiff,

v.

FIA CARDS SERVICES AND
TENAGLIA & HUNT P.A., LLP,

Defendants.

ADDENDUM TO FINAL REPORT

WHEREAS:

A. On April 2, 2024, I issued a final report recommending that the Court grant defendants Bank of America, N.A.[1] and Tenaglia & Hunt, P.A.'s motion to dismiss plaintiff Wittaya Theerachanon's ("Plaintiff") Amended Complaint in the above-captioned action (the "Final Report"). Dkt. 52. The Final Report stated that "exceptions to this report and all prior reports may be filed within eleven days of the date hereof." *Id.* at 7 (citing Ct. Ch. R. 144(d)(1)).

1. BOA has appeared on behalf of "FIA Card Services."

B. On April 16, 2024, Plaintiff filed a Notice of Appeal from the Final Report with the Delaware Supreme Court. Dkt. 53.

C. On April 17, 2024, the Delaware Supreme Court issued a Notice to Show Cause, directing Plaintiff to show cause why the appeal should not be dismissed as interlocutory. Dkt. 54.

D. On May 6, 2024, Plaintiff filed a Notice of Exceptions to the Final Report (the "Exceptions").[2] Dkt. 57.

E. On May 8, 2024, the Delaware Supreme Court issued an Order dismissing the appeal under Supreme Court Rule 29(b). *Theerachanon v. FIA Cards Servs. N.A.*, No. 155, 2024 (Del. May 8, 2024) (ORDER), Dkt. 11.

F. On May 9, 2024, Chancellor McCormick issued an Order Regarding Procedural Review, staying consideration of the Exceptions pending procedural review. Dkt. 61 ¶ 1.

2. The Notice of Exceptions is dated April 9, 2024. *See* Dkt. 57 at 9. On May 2, 2024, Bank of America, N.A. filed an Answering Brief in Opposition to Plaintiff's Notice of Exceptions, which states that "[o]n April 12, 2024, Plaintiff served BANA with a Notice of Exceptions and opening brief in support thereof." Dkt. 55 at 3. But the Notice of Exceptions was not properly filed with the Court until May 6, 2024. *See* Dkt. 57 at 1.

NOW, THEREFORE, IT IS HEREBY ORDERED, this 9th day of May, 2024, as follows:

1. Court of Chancery Rule 144(d)(1) provides that "[i]n actions that are not summary in nature or in which the Court has not ordered expedited proceedings, any party taking exception shall file a notice of exceptions within eleven days of the date of the report." Ct. Ch. R. 144(d)(1). Under the rule, the deadline for filing exceptions to the Final Report was April 15, 2024.[3] Because the Exceptions are untimely, I recommend that they be dismissed without further review.

2. As stated in the Chancellor's Order Regarding Procedural Review, exceptions to this Addendum must be filed within ten business days of the date hereof, *i.e.*, by May 23, 2024. Dkt. 61 ¶ 5.

/s/ *Bonnie W. David*

Bonnie W. David
Magistrate in Chancery

---

3. The eleven-day period ran on April 13, 2024, which was a Saturday. The next business day was Monday, April 15, 2024.

I note that even if the Court considered the April 16, 2024 Notice of Appeal as properly filed exceptions—and it is not—that filing too was untimely under Court of Chancery Rule 144(d)(1).

APPENDIX D — LETTER REPORT OF THE COURT OF CHANCERY OF THE STATE OF DELAWARE, EFILED APRIL 2, 2024

COURT OF CHANCERY OF THE
STATE OF DELAWARE

BONNIE W. DAVID
MAGISTRATE IN CHANCERY

COURT OF
CHANCERY COURTHOUSE
34 THE CIRCLE
GEORGETOWN, DE 19947

Final Report: April 2, 2024
Date Submitted: April 1, 2024

Wittaya Theerachanon
2203 Ferndale Avenue,
Unit A
Petersburg, Virginia 23803

Kevin M. Kidwell, Esquire
Richards, Layton & Finger, PA
920 N. King Street
Wilmington, Delaware 19801

Jennifer Dering, Esquire
Tenaglia & Hunt, P.A.
1521 Concord Pike, Suite 301
Wilmington, Delaware 19803

RE: *Wittaya Theerachanon v. FIA Cards Services, et al.*, C.A. No. 2023-0536-BWD

Dear Litigants and Counsel:

This letter report addresses defendants Bank of America, N.A. ("BOA")[1] and Tenaglia & Hunt, P.A.'s

1. BOA has appeared on behalf of "FIA Card Services."

("T&H," and with BOA, "Defendants") motion to dismiss plaintiff Wittaya Theerachanon's ("Plaintiff") amended pleading in the above- referenced action (the "Amended Complaint").

As you know, on May 18, 2023, Plaintiff, acting *pro se,* initiated this action through the filing of a pleading entitled "Complaint Breach Of Contract led to leading Malicious Prosecution" (the "Initial Complaint"). Compl. Breach Of Contract led to leading Malicious Prosecution [hereinafter, "Compl."], Dkt. 1. In August and September 2023, Defendants moved for a more definite statement pursuant to Court of Chancery Rule 12(e). Dkts. 21, 23. On December 14, 2023, I issued a letter report granting the motions for a more definite statement, explaining that the Initial Complaint was "not sufficiently intelligible to give fair notice of the nature of Plaintiff's claims" and directing Plaintiff to file an amended pleading within ten days of the December 14 letter report. Dkt. 34 at 3.

On January 4, 2024, Plaintiff filed the Amended Complaint. Am. Compl., Dkt. 36. As best I can discern, the Amended Complaint alleges the following. Plaintiff is a former holder of a BOA credit card account (the "Account"). *Id.* at 27. Plaintiff defaulted on the Account by failing to repay amounts owed to BOA. *Id.* at 17. BOA "issued [a] Settlement Contract[,]" but then "caus[ed] Plaintiff to violate[] the contract." *Id.* at 6. BOA received a tax deduction for the amounts Plaintiff owed, but filed a lawsuit against Plaintiff in the General District Court in Fairfax County, Virginia (the "Virginia Action") to "collect[] full double benefits." *Id.* at 6, 15-16. In the Virginia Action, Plaintiff submitted a "Ground of Defense," but failed to appear at trial, and BOA obtained a judgment against Plaintiff. *Id.* at 16, 30, 35-37. T&H represented BOA in the Virginia Action. *Id.* at 3-4.

The same day Plaintiff filed the Amended Complaint, Plaintiff also moved for summary judgment. Dkt. 35. On January 19 and 23, 2024, Defendants moved to dismiss the Amended Complaint (the "Motion to Dismiss"). Dkts. 38-39. On February 16, 2024, BOA filed an opening brief in support of the Motion to Dismiss. Dkt. 40. On February 23, 2024, Plaintiff filed a second motion for summary judgment; a motion to disqualify T&H and BOA's counsel at Richards, Layton, & Finger, PA; a brief entitled "Answer to the Inadmissible Opening Brief Opposing Counsels and The support information to the Motion to Disqualify the Opposing Counsels," which appears to address Plaintiff's motions for summary judgment and motion to disqualify; and supporting exhibits. Dkts. 42-45.

On March 4, 2024, I directed the parties to file all briefing concerning the pending motions no later than April 1, 2024, at which point the motions would be considered fully submitted. Dkt. 47. On March 21, 2024, Plaintiff filed a document labeled "Exhibit Z." Dkt. 48. On March 28, 2024, T&H filed a joinder to the Motion to Dismiss. Dkt. 49. On April 1, 2024, BOA filed oppositions to Plaintiff's motion to disqualify and motions for summary judgment. Dkts. 50-51.

Defendants have moved to dismiss the Amended Complaint under Court of Chancery Rule 12(b)(6).

When reviewing a motion to dismiss under Rule 12(b)(6), Delaware courts "(1) accept all well pleaded factual allegations as true, (2) accept even vague allegations as 'well-pleaded' if they give the opposing party notice of the claim; [and] (3) draw all reasonable inferences in favor of the non-moving party. . . ." *Cent. Mortg. Co. v. Morgan Stanley Mortg. Cap. Hldgs. LLC*, 27 A.3d 531, 535 (Del. 2011). "[T]he governing pleading standard in Delaware to survive a motion to dismiss is reasonable 'conceivability.'" *Id.* at 537.

The Amended Complaint clarifies that Plaintiff intends to assert one cause of action—a claim for malicious prosecution.[2] *See* Am. Compl. at 5.[3] Under Delaware law,

2. I have closely reviewed the Amended Complaint, Plaintiff's motions, and all supporting exhibits with the leniency this Court affords self-represented litigants, yet I can discern no other cause of action that is or could be asserted in the Amended Complaint.

3. *See also* Am. Compl. at 29-31 (alleging ten acts that purportedly constitute "Malicious Intent Action": (1) "FIA Card Services issued a Settlement Contract in Plaintiff's matter . . . [and] did . . . not [have] Plaintiff . . . sign"; (2) FIA Card Services "hid[] . . . documents from Plaintiff and st[ole] $5,600 from Plaintiff's Account twice"; (3) "FIA Card Services knew the Contract lacked . . . Plaintiff's Signature from the beginning plus one felony of stealing . . . but sent [T&H] to file [a] lawsuit against . . . Plaintiff"; (4) T&H "filed a frivolous lawsuit" in the Virginia Action; (5) "instead of withdrawing, [Defendants] pursued the case until it prevailed, causing the Judgment of Malicious Prosecution against . . . Plaintiff"; (6) "both counsels[] tr[ied] to drag the lawsuit with no sense"; (7) in this action, Defendants "submit[ted] two times the Motion for More Definitive Statement and the opinion [that] the claim [wa]s not colorable"'; (8) Defendants tr[ied] to cancel The Telephonic Oral

> [i]n order to make out a claim for malicious prosecution, a plaintiff must show that (1) defendant instituted civil or criminal proceedings against plaintiff, (2) no probable cause existed to support the charge or claim, (3) the proceedings were instituted and pursued with malice, (4) the proceedings were terminated in plaintiff's favor, and (5) plaintiff suffered damages as a result.

Batchelor v. Alexis Props., LLC, 2018 WL 5919683, at *3 (Del. Super. Nov. 13, 2018).

The Amended Complaint fails to state a claim for malicious prosecution. Even if the Amended Complaint adequately alleged the first three elements of a malicious prosecution claim against either Defendant, it plainly does not allege the fourth element—that the Virginia Action was terminated in Plaintiff's favor. To the contrary, the Amended Complaint alleges that the Virginia Action resulted in a judgment against Plaintiff. *See, e.g.*, Am. Compl. at 30 (alleging Defendants "pursued the case until [they] prevailed, causing the Judgment of Malicious Prosecution against the Plaintiff to be counted"); *id.* at 34 (alleging Defendants "file[d] a lacked legal ground lawsuit [that] resulted in the Malicious Judgment ruled out against Plaintiff on 11/23/2021"); *id.* at 35 ("The Judgement . . . commanded Plaintiff to pay the debt of $23,211.80 to

Argument on 09/08/2023"; (9) Defendants opposed "The Motion To Expedite"; and (10) Defendants "add[ed] another Counsel from two to three for intimidating purposes").

B[OA].").[4] For that reason, the Amended Complaint must be dismissed.[5]

Because the Amended Complaint is dismissed, all other pending motions are moot.[6]

Defendants seek fees under the bad-faith exception to the American Rule. *See* Dkt. 51. Though the Amended

---

4. Plaintiff points to the judgment in the Virginia Action as supporting a claim for malicious prosecution but does not allege that it terminated in Plaintiff's favor. *See* Am. Compl. at 29 ("The Abstract of Judgment is the official decision summary of the Judgement that is considered fact[.]"). *Cf. Alexander v. Petty*, 108 A.2d 575, 576-577 (Del. Ch. 1954) ("It is essential to the maintenance of such an action [for malicious prosecution] that the plaintiff shall prove, among other things, that the prosecution was not only terminated, but terminated in his favor." (alteration in original) (citation and internal quotation marks omitted)).

5. The Amended Complaint seeks punitive damages. *See* Am. Compl. at 4, 42-43. "Absent a statutory grant of authorization, the Delaware Court of Chancery does not have jurisdiction to assess punitive damages." *Metro Storage Int'l LLC v. Harron*, 275 A.3d 810, 886 (Del. Ch. 2022).

6. *See, e.g., Teuza - A Fairchild Tech. Venture Ltd. v. Lindon*, 2023 WL 3118180, at *8 n.103 (Del. Ch. Apr. 27, 2023) (declining to address the plaintiff's remaining arguments "because, to the extent they [we]re appropriate at the pleading stage, they [we] re mooted by [the] [p]laintiff's failure to plead the elements of promissory estoppel"); *Fernstrom v. Trunzo*, 2017 WL 6028871, at *5 (Del. Ch. Dec. 5, 2017) (recommending "the Court decline to address the pending motions" because "the complaint w[as] . . . dismissed"), *aff'd sub nom. Fernstrom v. Ellis Point Condo. Ass'n, Inc.*, 198 A.3d 178 (Del. 2018).

Complaint fails to state a claim, "I am not satisfied that this is the 'rare' case where a litigant's conduct should be deemed so 'egregious' that it merits fee-shifting, particularly given [Plaintiff]'s *pro se* status." *In re Smith*, 2021 WL 5764878, at *2 (Del. Ch. Dec. 3, 2021); *see also Cardone v. State Dep't of Corr.*, 2008 WL 2447440, at *11 n.116 (Del. Ch. June 4, 2008) ("declin[ing] to award the Respondents attorneys' fees[,]" explaining that "[u]nder the 'American Rule,' a party bears its own legal fees in the absence of certain conduct justifying fee shifting[,]" and "[i]n light of [Plaintiff]'s status as a *pro se* litigant, the Respondents ha[d] not identified the conduct necessary for fee shifting"); *Rowe v. Everett*, 2001 WL 1019366, at *8 (Del. Ch. Aug. 22, 2001) (denying fees though the *pro se* defendant "pursued an unorthodox litigation strategy which ha[d] caused much delay"). Accordingly, Defendants' request to shift fees is denied.

This is a final report pursuant to Court of Chancery Rule 144. The stay of exceptions is hereby lifted, and exceptions to this report and all prior reports may be filed within eleven days of the date hereof.[7]

Sincerely,

/s/ Bonnie W. David

Bonnie W. David
Magistrate in Chancery

---

7. *See* Ct. Ch. R. 144(d)(1) ("In actions that are not summary in nature or in which the Court has not ordered expedited proceedings, any party taking exception shall file a notice of exceptions within eleven days of the date of the report.").

APPENDIX E — ORDER REGARDING PROCEDURAL REVIEW IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE, FILED MAY 9, 2024

IN THE COURT OF CHANCERY
OF THE STATE OF DELAWARE

C.A. No. 2023-0536-BWD

WITTAYA THEERACHANON,

Plaintiff,

v.

FIA CARDS SERVICES AND
TENAGLIA & HUNT P.A., LLP,

Defendants.

ORDER REGARDING PROCEDURAL REVIEW

WHEREAS:

A. On April 2, 2024, the Magistrate in Chancery issued a final report granting defendants;

B. On May 6, 2024, plaintiff Wittaya Theerachanon filed a notice of exceptions to the April 2, 2024 final report; and

C. Procedural review of the notice of exceptions by the Magistrate will best ensure the just, speedy and inexpensive determination of this action;

IT IS HEREBY ORDERED:

1. Vice Chancellor Will is reassigned to this matter solely for the purposes of hearing the exceptions.

2. Consideration by Vice Chancellor Will is hereby STAYED until the Magistrate conducts a procedural review of the notice of exceptions and one of the following occurs:

   a. The Magistrate recommends that the exceptions be heard; or

   b. The Magistrate recommends that the exceptions not be heard for procedural reasons, and the exceptant timely files exceptions to such recommendation.

3. The Magistrate's recommendation shall be filed as an addendum to her final report within ten (10) days of this Order.

4. If the exceptant files timely exceptions to the Magistrate's addendum, the exceptant will only be charged the $2.00 per page docketing fee and not the standard fee for filing an exception.

5. Any exceptions to the Magistrate's recommendation shall be filed within ten (10) days of the filing of the addendum.

6. The Magistrate remains assigned primary responsibility for this matter.

IT IS SO ORDERED this 9th day of May 2024.

/s/ Kathaleen St. J. McCormick
Chancellor Kathaleen St. J. McCormick

APPENDIX F — JUDGMENT, DATED NOVEMBER 23, 2021

WARRANT IN DEBT (CIVIL CLAIM FOR MONEY)
Commonwealth of Virginia VA. CODE § 16.1-79

HEARING DATE AND TIME
June 24, 2021 1:45 PM

FAIRFAX COUNTY General District Court
CITY OR COUNTY **703/246-3012**

4110 Chain Bridge Road, Fairfax, VA 22030
STREET ADDRESS OF COURT

TO ANY AUTHORIZED OFFICER: You are hereby commanded to summon the Defendant(s).

TO THE DEFENDANT(S): You are summoned to appear before this Court at the above address on

June 24, 2021 at 1:45 PM to answer the Plaintiff(s)' civil claim
RETURN DATE AND TIME (*see below*).

MAY - 3 2021 /s/ [Illegible]
DATE ISSUED [ ] CLERK [X] DEPUTY CLERK
[ ] MAGISTRATE

CLAIM: Plaintiff(s) claim that Defendant(s) owe Plaintiff(s) a debt in the sum of $23,211.80 net of any credits, with interest at 0% from date of Judgment until paid, $64.00 costs, and $0.00 attorney's fees with the basis of this claim being [X] Open Account [ ] Contract [ ] Note [ ] Other (EXPLAIN) ____________________

Appendix F

HOMESTEAD EXEMPTION WAIVED?
[ ] YES [X] NO [ ] cannot be demanded

4/26/21 /s/ [Illegible]
DATE [ ] PLAINTIFF [X] PLAINTIFF'S ATTORNEY
[ ] PLAINTIFF'S EMPLOYEE/AGENT

CASE DISPOSITION

JUDGMENT against [X] named Defendant(s) [ ] ______ for $ 23,211.80 net of any credits, with interest at ----% from date of __________ until paid. $ 64.00 costs and $ ---- attorney's fees [ ] and ________ costs for Servicemember Civil Relief Act counsel fees

HOMESTEAD EXEMPTION WAIVED? [ ] YES [ ] NO [ ] CANNOT BE DEMANDED

[ ] JUDGMENT FOR [ ] NAMED DEFENDANT(S) [ ] ______________________________

[ ] NON-SUIT [ ] DISMISSED ____________________

Defendant(s) Present? [ ] YES ____________________
[X] NO

11/18/21 /s/ [Illegible]
DATE JUDGE

Appendix F

JUDGMENT PAID OR SATISFIED PURSUANT TO ATTACHED NOTICE OF SATISFACTION.

__________ /s/ ________________________
DATE CLERK

DISABILITY ACCOMMODATIONS

[Illegible] for loss of hearing, vision, mobility, etc., contact the court ahead of time.

CASE NO. GV21007009-00

Bank of America, N.A.
PLAINTIFF(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

Theerachanon, Wittaya
DEFENDANT(S)(LAST NAME, FIRST NAME, MIDDLE INITIAL)

2340 Carta Way, Apt 5022
Herndon VA 20171

WARRANT IN DEBT

* * *

TO DEFENDANT: You are not required to appear; however, if you fail to appear, judgment may be entered against you. See the additional notice on the reverse about requesting a change of trial location.

[ ] To dispute this claim, you ***must*** appear on the return date to try this case.

[x] To dispute this claim, you must appear on the return date for the judge to set another date for trial.

Bill of Particulars____________ _______________
ORDERED DUE

Grounds of Defense____________ _______________
ORDERED DUE

ATTORNEY FOR PLAINTIFF(S)

Amelia M. Kozlowski, VSB# 90786
Michael P Chabrow, VSB#27748
Tenaglia & Hunt, P.A.
9211 Corporate Blvd, Ste 130
Rockville, MD 20850

Telephone (240) 772-3144, fax (201) 226-0795
ATTORNEY FOR DEFENDANT(S)____________

RETURNS: Each defendant was served according to law, as indicated below, unless not found.

NAME ______________________________

ADDRESS ______________________________

[ ] PERSONAL SERVICE Tel. No ____________

Being unable to make personal service, a copy was delivered in the following matter:

[ ] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above.

____

____

[ ] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[ ] Served on Secretary of the Commonwealth

____

[ ] NOT FOUND

____

SERVING OFFICER

____________ for ______________________

DATE

OBJECTION TO VENUE:

To the Defendant(s): If you believe that Plaintiff(s) should have filed this suit in a different city or county, you may file a written request to have the case moved for trial to the general district court of that city or county. To do so, you must to the following:

Appendix F

1. Prepare a written request which contains (a) this court's name, (b) the case number and the "return date" as shown on the other side of this form in the right corner, (c) Plaintiff(s)' name(s) and Defendant(s)' name(s), (d) the phrase "I move to object to venue of this case in this court because" and state the reasons for your objection and also state in which city or county should be tried, and (e) your signature and mailing address.

2. File the written request in the clerk's office before the trial date (use the mail at your own risk) or give it to the judge when your case is called on the return date. Also send or deliver a copy to plaintiff.

3. If you mail this request to the court, you will be notified of the judge's decision.

I certify that I mailed a copy of this document to the defendants named therein at the address shown therein on

4/27/21 for [Illegible]
DATE
[ ] Plaintiff
[X] Plaintiff's Atty
[ ] Plaintiff's Agent

Fi. Fa. issued on ______________________

Interrogatories issued on: ______________________

Appendix F

Garnishment issued on: ____________________________

____

ABSTRACT OF JUDGMENT
Commonwealth of Virginia VA. CODE § 8.01-449

Case No. GV21007009-00

FAIRFAX CO. GENERAL DISTRICT COURT - CIVIL
4110 CHAIN BRIDGE ROAD, FAIRFAX, VA 22030
DISTRICT COURT NAME AND ADDRESS

BANK OF AMERICA NA
FULL NAME OF PLAINTIFF (LAST, FIRST, MIDDLE)

____
ADDRESS

9211 CORPORATE BLVD, 130
ROCKVILLE, MD 20850

____
CITY STATE ZIP

DATE OF BIRTH SSN (LAST FOUR DIGITS ONLY)

____
FULL NAME OF PLAINTIFF(S)

____
ADDRESS

CITY STATE ZIP

DATE OF BIRTH SSN (LAST FOUR DIGITS ONLY)

v.

THEERACHANON, WITTAYA
FULL NAME OF DEFENDANT (LAST, FIRST, MIDDLE)

ADDRESS

2340 CARTA WAY, 5022
HERNDON, VA 20171

CITY STATE ZIP

DATE OF BIRTH SSN (LAST FOUR DIGITS ONLY)

FULL NAME OF DEFENDANT(S)

ADDRESS

CITY STATE ZIP

DATE OF BIRTH SSN (LAST FOUR DIGITS ONLY)

Appendix F

This is to certify that a judgment was rendered in this court in favor of:

[X] PLAINTIFF(S) against DEFENDANT(S)

[ ] DEFENDANT(S) against PLAINTIFF(S)

[ ] ______________________ v. ______________________

DATE OF JUDGMENT 11/18/2021

$ 23,211.80	AMOUNT OF JUDGMENT
$	AMOUNT OF JUDGMENT NOT SUBJECT TO ACCRUAL OF INTEREST

HOMESTEAD EXEMPTION WAIVED
[ ] YES [ ] NO
[ ] CANNOT BE DEMANDED

$	ALTERNATE VALUE OF SPECIFIC PROPERTY AWARDED

INTEREST RATE(S) AND BEGINNING DATE(S)

COSTS $ 64.00

ATTORNEY'S FEES $ 0.00

ATTORNEY TENAGLIA & HUNT

OTHER:

I certify the above to be a true abstract of a judgment rendered in this court.

11/23/2021	
DATE	[ ] CLERK [ ] JUDGE

Appendix F

Gmail wittaya theerachanon <support@tayainvestment.com>

Request to postpone Court Date
6 messages

Taya Investment LLC Fri, Nov 12, 2021 at 3:11 PM
<support@tayainvestment.com>
To: GDCMail@fairfaxcounty.gov

Dear Ms Susan Madsen

I am having the Court date on 11/18/2021 I would like to postpone the court date. Please find The form attached below.

Best Regards,
Wittaya Theerachanon.
Case No. GV-2100 7009-00
Phone-917-214-4383

---

courtdate postpone..pdf
237K

GDC Admin Mail Fri, Nov 12, 2021 at 3:26 PM
<GDCMail@fairfaxcounty.gov>
To: Taya Investment LLC <support@tayainvestment.com>

Your request has been received and will be placed on the front of the file.

Thanks,
Fairfax GDC Civil Division

Appendix F

-----Original Message-----
From: Taya Investment LLC <support@tayainvestment.com>
Sent: Friday, November 12, 2021 3:12 PM
To: GDC Admin Mail <GDCMail@fairfaxcounty.gov>
Subject: Request to postpone Court Date

[You don't often get email from support@tayainvestment.com. Learn why this is important at http://aka.ms/LearnAboutSenderIdentification.]

[Quoted text hidden]

Taya Investment LLC. Tue, Nov 23, 2021 at 8:31 AM
<support@tayainvestment.com>

To: GDC Admin Mail <GDCMail@fairfaxcounty.gov>

Dear Ms Madsen

May I request for the Judgement documents through the email? Please kindly submit the documents to me through this email I would be appreciated. Thank you.

Best regards,
Wittaya Theerachanon.

[Quoted text hidden]

Appendix F

GDC Admin Mail Tue, Nov 23, 2021 at 8:52 AM
<GDCMail@fairfaxcounty.gov>
To: "Taya Investment LLC." <support@tayainvestment.com>

We have received your copy request and it has been assigned to a clerk to complete. It will be completed in the order it was received.

Thank you,
Fairfax GDC Civil Team

[Quoted text hidden]

---

wittaya theerachanon Wed, Dec 1, 2021 at 4:30 PM
<support@tayainvestment.com>
To: GDC Admin Mail <GDCMail@fairfaxcounty.gov>

Dear GDC Admin Department /Ms Madsen

First of all I would like to say thank you to forward the Judgment to me the other day. I would like to get some suggestions from GDC for the The resulted of the Judgment Case Number No. GV-2100 7009-00 what will happen? And what stage or process from the Plaintiff are at now ? So I will know and will be ready to face in what will happen and will find the best solution for myself. I would be appreciated in your kindness also I'm looking forward to hearing back from you soon.

Best Regards,
Wittaya . Theerachanon
TayaJewelryWashingtonDC Llc.

Appendix F

On Nov 12, 2021, at 3:26 PM, GDC Admin Mail <GDCMail@fairfaxcounty.gov> wrote:

No. GV-2100 7009-00

GDC Admin Mail Thu, Dec 2, 2021 at 9:02 AM
<GDCMail@fairfaxcounty.gov>
To: wittaya theerachanon <support@tayainvestment.com>

Good morning,

The plaintiff has the right to file a few different things to collect the money they are owed. They have 10 years to try and collect on it. You may speak with the plaintiff if you would like to see where they are in the process. I have attached a form with some information.

Thank you,
Fairfax GDC Civil Team

From: wittaya theerachanon <support@tayainvestment.com>
Sent: Wednesday, December 1, 2021 4:31 PM
To: GDC Admin Mail <GDCMail@fairfaxcounty.gov>

[Quoted text hidden]

[Quoted text hidden]

So You LOST a Judgment 7.2019.pdf
176K

APPENDIX G — APPLICATION FOR DEFAULT JUDGMENT IN THE SUPREME COURT OF THE STATE OF DELAWARE

IN THE SUPREME COURT
OF THE STATE OF DELAWARE

NO# 155, 2024

WITTAYA THEERACHANON,

Plaintiff, Below Appellant,

v.

FIA CARDS SERVICES; TENAGLIA & HUNT P.A. LLP,

Defendants, Below Appellee.

Court Below: Chancery Court of the State of Delaware
C.A. No. 2023-0536-BWD

NOTICE OF THE APPLICATION FOR DEFAULT JUDGMENT

Ground: *Delaware Rule of Civil Procedure Supreme Court Rule 55 Default Judgment. Judgment is when the party against whom a Judgment affirmative relief is sought has failed to appear, plead, or otherwise defend as this rule provides.*

Come now, The Appellant Wittaya Theerachanon, a Pro Se Appellant herein and request The Supreme Court of the State of Delaware's Clerk office, pursuant to

Appendix G

Delaware Rule of Civil Procedure Supreme Court Rule 55, to enter default against the Defendant FIA CARDS SERVICES N.A. in the above-entitled action for failure to plead, answer or otherwise defend as set forth in the Affidavit attached hereto.

Respectfully Submitted,

/s/

Wittaya Theerachanon,
Pro Se Appellant

Appendix G

AFFIDAVIT IN SUPPORT OF ENTRY OF DEFAULT

State of Delaware.

County of Sussex.

Wittaya Theerachanon v. FIA Cards Servicers N.A., Tenaglia & Hunt P.A. LLP.

Appeal No# 155, 2024 From Trial Court The Chancery Court of the State of Delaware CA# 2023-0536-BWD

Personally Came and Appeared Before Me, the Undersigned authority in and for the jurisdiction aforesaid the within named Wittaya Theerachanon, the Plaintiff at below Court and The Appellant at this Court, who having first been duly sworn by my state on oath the following:

1. I am a Pro Se Plaintiff from the below court, and The Appellant of this court has personal knowledge of the facts set forth in this Affidavit.

2. A copy of the Summons and a copy of the Complaint served by New Castle County Sherriff, return Praciept requested on 05/18/2023, and The Amended Complaint served on 12/02/2023. Also, two copies of the Notice of Appeal were served upon the Defendant by certified mail, with restricted delivery since 04/15/2024 before the Appealing was filed. Pursuant to The Court Rules and Civil Procedure, the Service of Process was deemed complete for Defendant. The Defendant is a Bank of America N.A. Subsidiary and conducts the business

under the name FIA Cards Services N.A. Both companies merged in 2006, but a new name changed from MBNA under FIA Cards Services N.A. in 2014. The Defendant was hiding under the Parent Entity's umbrella all the time since the lawsuit was filed still Bank of America N.A., as a Parent Entity, took over the step that authorized the Counsels to enter the lawsuit to represent Parent Entity in a lawsuit filed against its Subsidiary without authority and disturbed the legal assembly violated ***Del Code tit 11 § 1301(c)***[1] and continuing to submit the documents under the Parent Entity isn't a Defendant and the Appellee, but the Defendant "FIA Cards Services N.A." keep hiding and ignorant to all legal documents that directory affected its interest and the Defendant was the cause of harmful.

3. More than one year has elapsed since the lawsuit was filed, and all documents served.

4. That Defendant has failed to answer or otherwise defend as to the Appellant Complaint or serve a copy of any Answer or other defense which it might have upon in this legal matter. Only disturbant documents from its Parent Entity had been submitted.

5. That is Affidavit executed by affiant herein in accordant with The Supreme Court of the State of Delaware Rule 55 of Civil Procedure to enable The Appellant to obtain the entry of default judgment against

1. § 1301. Disorderly conduct; unclassified misdemeanor. A person is guilty of disorderly conduct when:c. Disturbing any lawful assembly or meeting of persons without lawful authority; https://delcode.delaware.gov/title11/c005/sc07/

the Defendant "FIA Cards Services N.A." for this failure to Answer or otherwise defend as to the Appellant Complaint and The Amended Complaint even to the Appealing.

/s/ ____________________
Wittaya Theerachanon,
Pro Se Appellant

Appendix G

IN THE SUPREME COURT
OF THE STATE OF DELAWARE

NO# 155, 2024

WITTAYA THEERACHANON,

Plaintiff, Below Appellant,

v.

FIA CARDS SERVICES; TENAGLIA & HUNT P.A. LLP,

Defendants, Below Appellee.

Court Below: Chancery Court of the State of Delaware
C.A. No. 2023-0536-BWD

MOTION FOR DEFAULT JUDGMENT

Come now, The Appellant, Wittaya Theerachanon, a Pro Se Plaintiff from below Court and The Appellant at this Court herein and respectfully moves the Court pursuant to the Court Rule 55, The Supreme Court of the State of Delaware Rule of Civil Procedure, for default judgment and in support thereof would show unto the Court the following:

1.

A Summon, together with a copy of Complaint served by New Castle County Sherriff, return Praciept requested on 05/18/2023 and a copy of The Amended Complaint served on 12/02/2023, also of 2 copies of The Notice of Appeal served by Certified mail on 04/15/2024. All documents were served upon Defendant at the lower Court and the Appellee at this Court ("FIA Cards Services N.A."), pursuant to the Chancery Court Rules and The Supreme Court of the State of Delaware Rule of Civil Procedure, the service of process was deemed complete on the Defendant. The defendant has failed or refused to answer or otherwise defend.

2.

The Defendant has not filed the Entry of Appearance.

3.

That on the ________, day of May 2024, the Clerk of this Court, after reviewing the Application for Default Judgment and the supporting Affidavit, docketed Entry of Default Judgment against the Defendant "FIA Cards Services N.A."

4.

Pursuant to Court Rule 55, The Supreme Court of the State of Delaware Rules of Civil Procedure. The Appellant is entitled to a Default Judgment for Defendant's failure to appear and answer or otherwise defend.

5.

The claims in The Appellant's Brief, Counterclaim, and Crossclaim are for a sum certain or a sum that can be determined by computing the malicious intentional recidivism harmful to the Defendant as considering "Public Harm" unaware of the reprehensibility result afterward or other person's life. Thus, the Default Judgment should be entered without the necessity of a further hearing.

WHEREFORE PREMISES CONSIDERS, The Appellant moves the Court to enter a default judgment against the defendant in the amount prayed for The Compensatory Relief under the claim of $1,000,000 (One Million Dollars) and Crossclaim for $1,000,000 (One Million Dollars) and The Counterclaim Punitive Damage Relief of $290,000,000 (Two Hundreds Ninty Million Dollars) as they have prayed in The Appellant's Opening Brief and Reply Brief, and/or other amounts of the reliefs the Court may deem necessary and appropriate.

Respectfully Submitted,

/s/____________________
Wittaya Theerachanon,
Pro Se Appellant

Appendix G

IN THE SUPREME COURT
OF THE STATE OF DELAWARE

NO# 155, 2024

WITTAYA THEERACHANON,

Plaintiff, Below Appellant,

v.

FIA CARDS SERVICES; TENAGLIA & HUNT P.A. LLP,

Defendants, Below Appellee.

Court Below: Chancery Court of the State of Delaware
C.A. No. 2023-0536-BWD

ENTRY OF DEFAULT

Upon Consideration of The Appellant Application for Entry of Default and the supporting Affidavit, both in Compliance with The Supreme Court of the State of Delaware Rules of Civil Procedure, Rule 55. It is hereby determined that a copy of Summon and Complaint was served upon the defendant on 05/18/2023, and The Amended Complaint was served on 12/02/2023. Also, two copies of the Notice of Appeal were served upon the Defendant by certified mail, with restricted delivery since 04/15/2024. Pursuant to The Supreme Court of the State of Delaware Rules of Civil Procedure, Rule 55. The Service of Process was deemed completed on Defendant.

The Defendant failed to pledge to defend or otherwise respond to this action.

THEREFOR, default is hereby entered against FIA CARDS SERVICES N.A. this the ______ day of ______, 2024

/s/ ____
Clerk of the Supreme Court of the State of Delaware
In The Supreme Court of The State of Delaware.

Appendix G

DEFAULT JUDGMENT

This action came on for hearing on the motion of the Plaintiff for Default Judgment Pursuant to The Supreme Court of the State of Delaware Rules of Civil Procedure, Rule 55 and Defendant having been duly served with Summon and Complaint, Amended Complaint and Notice of Appeal and not being an infant or unrepresented incompetent person and having fail to plead or otherwise defend and default having been duly entered and Defendant having taken no proceeding since such default was entered, and the Court having considered and determined the damage which are some certain the court find that it has jurisdiction of the Party and subject matter of this cause, and further find that The Appellant is entitled to the Judgment against the Defendant in the sum of Compensatory Relief $1,000,000 (One Million Dollars) Punitive Damage Relief $290,000,000 (Two Hundred Ninty Million Dollars) IT IS HEREBY, ORDERED AND ADJUDGED this the _______ day of _______, 2024

/s/_______________________________________

The Supreme Court of the State of Delaware Judge.

APPENDIX H — NOTICE OF THE SUPREME COURT OF THE STATE OF DELAWARE, FILED APRIL 18, 2024

IN THE SUPREME COURT
OF THE STATE OF DELAWARE

No. 155, 2024

Court Below: Chancery Court
of the State of Delaware

C.A. No. 2023-0536-BWD

WITTAYA THEERACHANON,

Petitioner Below, Appellant,

v.

FIA CARDS SERVICES N.A.,
TENAGLIA & HUNT P.A. LLP,

Respondent Below, Appellee.

TO: Mr. Wittaya Theerachanon 2203 Ferndale Avenue, Unit A Petersburg, Virginia 23803

NOTICE TO SHOW CAUSE

You are directed to show cause why this appeal should not be dismissed as interlocutory because Magistrate David's April 2, 2024 order has not been approved and entered as a final order of the court as provided in Court of Chancery Rule 144(c).

Please respond in writing to this notice to show cause within 10 days after you receive it. If you do not respond, the dismissal shall be deemed to be unopposed.

Date: April 17, 2024

/s/ *Beryl B. Nyamburi*
Beryl B. Nyamburi
Supreme Court Senior Clerk

APPENDIX I — CONSENT ORDER OF THE UNITED STATES OF AMERICA DEPARTMENT OF THE TREASURY COMPTROLLER OF THE CURRENCY, DATED MAY 29, 2015

UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
COMPTROLLER OF THE CURRENCY

AA-EC-2015-1

IN THE MATTER OF:

BANK OF AMERICA, N.A.
CHARLOTTE, NORTH CAROLINA.

CONSENT ORDER

The Comptroller of the Currency of the United States of America ("Comptroller"), through his national bank examiners and other staff of the Office of the Comptroller of the Currency ("OCC"), has conducted examinations of Bank of America, N.A., Charlotte, North Carolina, and FIA Card Services, N.A.,[1] Wilmington, Delaware. The OCC has identified (i) unsafe or unsound practices in connection with Bank of America, N.A.'s (the "Bank's") efforts to comply with the Servicemembers Civil Relief Act ("SCRA"), (ii) SCRA violations, and (iii) unsafe or unsound practices in connection with the Bank's sworn document and collections litigation practices. The OCC has informed the Bank of the findings resulting from the examinations.

---

1. The FIA Card Services, N.A. charter was consolidated into Bank of America, N.A. in October of 2014.

Appendix I

The Bank, by and through its duly elected and acting Board of Directors ("Board"), has executed a "Stipulation and Consent to the Issuance of a Consent Order," dated May 29, 2015, that is accepted by the Comptroller. By this Stipulation and Consent, which is incorporated by reference, the Bank has consented to the issuance of this Consent Cease and Desist Order ("Order") by the Comptroller. The Bank has begun corrective action, and is committed to taking all necessary and appropriate steps to remedy the deficiencies, unsafe or unsound practices, and violations of law identified by the OCC, and to enhance the Bank's SCRA compliance practices and sworn document and collections litigation practices.

ARTICLE I

COMPTROLLER'S FINDINGS

The Comptroller finds, and the Bank neither admits nor denies, the following:

(1) For purposes of this Order, the following definitions shall apply:

(a) "Accounts" refers to accounts for an extension of credit in all lines of business, except home lending, regardless of whether they are in Collections Litigation.

(b) "Collections Litigation" refers to attempts by the Bank (or a third party acting on its behalf), through legal proceedings in the

United States, to (i) collect, or establish liability for, debts or liabilities in connection with Accounts in all lines of business, except home lending, or (ii) establish the Bank's right, title, and interest in and to collateral and/or realize on and liquidate collateral in connection with such Accounts.

(c) "Collections Litigation Accounts" refers to Accounts in Collections Litigation with respect to the credit cards and demand deposit overdrafts lines of business where sworn documents were filed by or on behalf of the Bank in state or federal courts.

(d) "Legal Requirements" refers to all applicable: federal and state laws (including the U.S. Bankruptcy Code and the Servicemembers Civil Relief Act ("SCRA")); rules; regulations; and court orders, rules and requirements.

(e) "SCRA benefits" refers to the benefits provided by 50 U.S.C. app. § 527 ("Section 527"). Section 527 provides that, upon a servicemember's providing both written notice and a copy of his/her military orders to the creditor (and any orders further extending that military service), which shall occur no later than 180 days after the servicemember's termination or release from military service, an obligation or liability that was incurred by the servicemember, or by the servicemember and his or her spouse jointly, before the servicemember entered military service, shall not bear interest (as that term is defined in 50 U.S.C. app. § 527(d)(1)) at a rate in excess of six percent (6%) per year during:

(i) The period of military service (i.e., active duty, as defined in 10 U.S.C. § 101(d)), and one year thereafter for an obligation or liability consisting of a mortgage, trust deed, or other security in the nature of a mortgage, and, pursuant to 50 U.S.C. app § 516, in the case of reservists, during the period beginning on the date of receipt of the order to report and ending on the date on which the reservist reports for military service;

(f) "SCRA protection" refers to all of the protections provided by the SCRA other than the SCRA benefits, including protections related to default judgments provided by 50 U.S.C. app. § 521 ("Section 521"). SCRA protection is to be provided whether or not a servicemember has made a request for such protection.

(g) "SCRA-Protected Servicemember" refers to servicemembers as defined in 50 U.S.C. app. § 511(1) and (2).

(2) In connection with the Bank's efforts to comply with the SCRA, the Bank:

(a) Failed to have in place effective policies and procedures across the Bank to ensure compliance with the SCRA;

(b) Failed to devote sufficient financial, staffing and managerial resources to ensure proper administration of its SCRA compliance processes;

(c) Failed to devote to its SCRA compliance processes adequate internal controls, compliance risk management, internal audit, third party management, and training; and

(d) Engaged in violations of the SCRA.

(3) In connection with the Bank's sworn document and Collections Litigation processes, the Bank:

(a) Filed or caused to be filed in courts affidavits executed by its employees or employees of third-party service providers making assertions in which the affiant represented that the assertions in the affidavit were made based on personal knowledge or based on a review by the affiant of the relevant books and records, when, in many cases, they were not based on such personal knowledge or review of the relevant books and records;

(b) Filed or caused to be filed in courts numerous affidavits when the Bank did not follow proper notary procedures;

(c) Failed to devote sufficient financial, staffing and managerial resources to ensure proper administration of its sworn document and Collections Litigation processes; and

(d) Failed to sufficiently oversee outside counsel and other third-party providers handling sworn document and Collections Litigation services.

(4) The unsafe or unsound practices and violations of law identified in this Article were, in part, the result of deficiencies in the Bank's enterprise compliance risk management function, including deficiencies with respect to independent testing, governance routines, risk assessment, and oversight.

(5) By reason of the conduct set forth above, the Bank engaged in unsafe or unsound practices and violations of law.

Pursuant to the authority vested in him by the Federal Deposit Insurance Act, as amended, 12 U.S.C. §1818(b), the Comptroller hereby ORDERS that:

Appendix I

ARTICLE II

COMPLIANCE COMMITTEE

(1) The Board shall appoint and maintain a Compliance Committee of at least three (3) directors of the Bank, of which a majority may not be employees or officers of the Bank or any of its subsidiaries or affiliates. At formation and thereafter in the event of a change in the membership, the names of the members of the Compliance Committee shall be submitted to the Examiner-in-Charge for a written determination of no supervisory objection by the Examiner-in-Charge. The Compliance Committee shall be responsible for monitoring and overseeing the Bank's compliance with the provisions of this Order, and approving measures necessary to

****

APPENDIX J — THE NOMINATION 2024 # 2266

Nomination: 2266

WittayaTheerachanon Also known by Taya Anderson

Started at: 2/14/2024 01:55 PM - Finalized at: 2/22/2024 01:27 PM

Page: General Information

Nomination Type

Nomination for Individual

Please type the name of the nominee as it should appear on the award.

nameOfNominee

WittayaTheerachanon Also known by Taya Anderson

Is this individual a U.S. citizen?

U.S. citizenship is a requirement.

Nominee's Title

Ms.

Company / Non-profit

Appendix J

Nominee Work Address

2203 Ferndale Avenue
Unit A
Pretersburg Virginia 23803 US

Nominee Work Phone Number

4432073225

Nominee Work Email

support@tayainvestment.com

Administered by
The United States Patent and Trademark Office
U.S. Department of Commerce

OMB Approval No. 0651-0060
Expiration Date 5/31/2024

Page: Summary of Nominee's Contribution/Achievement

Refer to the Nomination Guidlines at www.uspto.gov/nmti (http://www.uspto.gov/nmti).

Proposed Citation for Contribution / Achievement (Limit 1-2 sentences)

The Resolution Debt Collection System Reconstruction.

Executive Description of Contribution / Achievement (Limit 1 page / 500 words)

Text

alias3902d178ab554585a3c9a0f75c79c0e1

As an Immigrant who immigrated to The US in 2006, I missed many opportunities in life, from being inexperienced to verifying which is the best option. Many times, I made a mistake for that reason. English is my second language, resulting in me not being confident in many skills I had in my soul. I am still not entirely confident since it suddenly arose in my life. It was in the discovery stage of my legal determination; it was so precise even after only one year at a law school. As a minority living in The United States, I found many business entities treating people with immigrant profiles unfairly, not negatively, but that's a fact. The root of the reason why they are treating minority people unfairly is that they know "we are limited in English skill and lack of Law understanding," and most of us do. The precise law determination in my soul made me figure out every transaction that those businesses deception, violate laws only making their extra profits from easily targeted. When it happens to me, it will happen to many minorities, but the difference is I can figure things out when it happens. That's why it made me involved in many issues, only because I corrected them. Two lawsuits were filed against that malicious business mind management to prove if my theories were right.

Those minority people had no clues; some may do but can not explain or fix the issue nor even get out of the loophole from the malicious business mind management digging deep to trap them. They are stuck in there, and a new face falls into this loophole every day if nobody stops them.

Those deceptive financial transactions sink their fewer opportunities in life to none in the end.

I alone can not do much to prevent them or fight with those many malicious business mind management. The only way to help and make a person like me more powerful is to get involved in The Nomination to pass this message from minorities to the White House. I am finding a way to implement the culminating national project that I created, which was proven by my Professor when I submitted this project concept as the assignment in the law school class. Recently, the Proposal pushed me to become a qualified student for a Ph.D. program in Public Policy at George Mason University SCHAR School of Policy and Government with the Inclusion & Access Scholarship offered without graduating with my master's degree. The correct theory is in my hand, and more profound research has been done for years to maximize this Utility Invention to be a tool to clean up those traps to prevent a new one from falling into and free those minorities who are stuck with providing them the pathway to meet the second chance they deserve.

Besides those reasons, this Utility invention will bring the revenues that belong to the US but never collected from the incomplete law.

Respectfully Submitted,

Taya A.

Appendix J

Comprehensive Description of Contribution / Achievement (Limit 5 pages / 2,500 words)

PDF

aliasaebfd943335648a9b26a757172c8c5ea

Download File (https://nmti.secureplatform.com/file/7346/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJtZWRpYUlkIjo3MzQ2LCJhbGxvd05vdFNpZ25lZFVybCI6IkZhbHNlIiwiaWdub3JlT3BlbUtility%20Patent%20Debt%20Collection%20System%20Reconstruction.pdf)

Administered by
The United States Patent and Trademark Office
U.S. Department of Commerce

OMB Approval No. 0651-0060
Expiration Date 5/31/2024

Page: Nominee Biographical Information

Is nominee being nominated for the same achievement to the National Medal of Science?

No

Has the nominee been a recipient of the National Medal of Science or the National Medal of Technology and Innovation?

No

Appendix J

Summary of awards and honors the nominee has received (Limit 1 page / 500 words)

PDF

alias8d01ae42dcca4c4280ad4de8076119ed

Download File (https://nmti.secureplatform.com/file/7349/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJtZWRpYUlkIjo3MzQ5LCJhbGxvd05vdFNpZ25lZFVybCI6IkZhbHNlIiwiaWdub3JlT3BlbSummary%20of%20Awards%20and%20Honors%20the%20Nominee%20has%20Received.pdf)

Patents and Publications (Limit 1 page / 500 words)

PDF

aliasc94a135c13e64ae69c9eda28e62833bd

Download File (https://nmti.secureplatform.com/file/7350/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJtZWRpYUlkIjo3MzUwLCJhbGxvd05vdFNpZ25lZFVybCI6IkZhbHNlIiwiaWdub3JlT3BlbPatents%20and%20Plublications.pdf)

Copyrights and Trademarks (Limit 1 page / 500 words)

PDF

alias7959201a98ee42c6b597e67ca5829638

Download File (https://nmti.secureplatform.com/file/7351/eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJtZWR

Appendix J

pYUlkIjo3MzUxLCJhbGxvd05vdFNpZ25lZFVybCI6Ik
ZhbHNlIiwiaWdub3JlT3BlbCopyrights%20and%20
Trademarks.pdf)

Administered by
The United States Patent and Trademark Office
U.S. Department of Commerce

OMB Approval No. 0651-0060
Expiration Date 5/31/2024

Page: Nominator Information

First Name

Taya

Last Name

Anderson

Email Address

support@tayainvestment.com

Nominator's Title

Ms.

Nominator's Relationship to Nominee and Contribution

The Author

Company / Non-profit

Nominator's Work Address

2203 Ferndale Avenue
Unit A
Pretersburg Virginia 23803 US

Work Phone Number

4432073225

Administered by
The United States Patent and Trademark Office
U.S. Department of Commerce

OMB Approval No. 0651-0060
Expiration Date 5/31/2024

Page: Letters of Recommendation

- The nomination should include a ***minimum* of one letter and a *maximum* of six letters** of recommendation or support from individuals who have first-hand knowledge of the cited achievement(s). The letters should be from a diverse group of individuals or organziations (ie. the letters should not all come from the nominee's workplace).
- Successful nominations typically have 3-6 quality letters of recommendation from different experts that directly address the impact of the nominee's achievement on their field, other fields, their community, nationally, and/or globally.
- Letters should be saved as a PDF file.

- **In this section, please fill out contact information below for those sending letters of recommendation, and send the request.**

- **An email will be sent to them with your request and further instructions.**

- **Letters of recommendation must be uploaded by the recommenders to this nomination portal by midnight ET, May 3, 2024. You will be notified when the letter writers completed their submissions.**

Recommendation #1

FullName: Brad Nelson
Email: Bnellie20@gmail.com

Recommendation #2

FullName: Markie Mark
Email: poppie@mail.com

Recommendation #3

FullName: Danny Quin
Email: qkdo216@gmail.com

Recommendation #4

FullName: Kindaya Kaleb
Email: Kalebmulu@yahoo.com

Appendix J

Recommendation #5

FullName:
Email:

Recommendation #6

FullName:
Email:

Administered by
The United States Patent and Trademark Office
U.S. Department of Commerce

OMB Approval No. 0651-0060
Expiration Date 5/31/2024

Page: Compliance with Program Terms

complianceWithProgramTerms1

N/A

The Department of Commerce requests that recipients of the National Medal of Technology and Innovation work with its agencies and the National Science and Technology Medals Foundation to share additional information about "lessons learned" regarding U.S. commercial process and competitiveness.

The public reporting burden for the collection of this information is estimated to average 40 hours per response, including the time for reviewing instructions, collecting information, and completing the form. All responses to this request for information are voluntary for purposes of the Paperwork Reduction Act. Please mark clearly any portion of the information submitted that you consider to be proprietary and it will be afforded confidentiality to the extent allowed under the Freedom of Information Act. Notwithstanding any other provision of law, no person is required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB control number. Comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, can be sent to the Chief Administrative Officer, United States Patent and Trademark Office, P.O. Box 1450, Alexandria, VA 22313-1450 (NMTI@uspto.gov (mailto:NMTI@uspto.gov)).

The United States Patent and Trademark Office (USPTO) collects this information under authority of 15 USC 3711. The information in this system of records is used to manage records such as name, postal address, telephone number, e-mail address, citizenship, employment history, and other information pertaining to an individual's activities, statements containing various kind of information with respect to the contributions of the individual(s) and/or group(s). The information you provide is protected from disclosure to third parties in accordance with the Privacy Act.

However, routine uses of this information may include disclosure to the following: to law enforcement and investigation in the event that the system of records indicates a violation or potential violation of law; to a Federal, state, local, or international agency, in response to its request; to an agency, organization, or individual for the purpose of performing audit or oversight operations as authorized by law; to non-federal personnel under contract to the agency; to a court for adjudication and litigation; to the Department of Justice for Freedom of Information Act (FOIA) assistance; to members of congress working on behalf of an individual; to the Office of Personnel Management (OPM) for personnel research purposes; to National Archives and Records Administration for inspection of records. Failure to provide any part of the requested information may result in an inability to process nominations. The applicable Privacy Act System of Records Notice for this information is COMMERCE/PAT-TM-21 National Medal of Technology and Innovation Nominations: Federal Register / Vol. 73, No. 18 / Monday, January 28, 2008 / Notices 4851 available at https://www.uspto.gov/sites/default/files/sorn/uspto-pasorn-21.pdf (https://www.uspto.gov/sites/default/files/sorn/uspto-pasorn-21.pdf).

Administered by
The United States Patent and Trademark Office
U.S. Department of Commerce

OMB Approval No. 0651-0060
Expiration Date 5/31/2024

Appendix J

Proposal of Legal Concept

The Solution Debt Collection System Reconstruction. The Urgent Project to Assist Minority's Victims.

Sympathy Regulation Became a Bonus.

IRS Sympathy Regulation Became a Bonus for Financial Institutions in the US.

What is the best step if we invest $100,000 to open a business, make our own decisions at every step, and think we have done the best research in the field but failed in business?

a. We lost all your funds but got the experience as a life learner.

b. We lost all our funds but got the experience as a life learner and filed a business loss claim in our income tax.

c. We lost all our funds but got the experience as a life learner, filed a business loss claim in our income tax, and tried to get our funds back as much as possible.

If The Answer is a. We Lost All Your Funds But Got the Experience as a Lifelong Learner.

We should know how the IRS(Internal Revenue Service) understands and shows sympathy to small business owners who are at high risk of getting to the point of success. The IRS allows you to claim a business lost from your income tax return, hoping you get back on your feet.

If The Answer is b, We Lost all Your Funds But Got Experience as a Life Learner and Filed a Business Loss Claim in Our Income Tax.

We are intelligent people, but as we know, sometimes things can go wrong even with a good business plan. At least you find the best solution in our critical time.

If The Answer is c, We Lost all our Funds But Got Experience as a Life Learner, Filed a Business Loss Claim in our Income Tax, and Tried to Get our Funds Back as Much as Possible From the Bad Debt After We Got Relief.

This option will be rare or never happen to business owners in other fields. Still, it can only become a big bonus for the financial institutions in the United States from this IRS regulation Topic 453 Bad debt deductions.

IRS Topic 453 Bad Debt Deductions. The Sympathy from the IRS Became a Big Bonus for Financial Institutions in The United States.

"In accordance with IRS Topic 453, If someone owes you money you can't collect, you may have a bad debt. To discuss what constitutes a valid debt, refer to Generally, to deduct a bad debt, you must have previously included the amount in your income or loaned out your cash. If you're a cash method taxpayer (most individuals are), you generally can't take a bad debt deduction for unpaid salaries, wages, rents, fees, interests, dividends, and similar taxable income items. For a bad debt, you must show that you intended to make a loan and not a gift at the time of the transaction. If you lend money to a relative or friend with the understanding that the relative or friend may not repay it, you must consider it a gift, not a loan, and you may not deduct it as a bad debt."

If we look into this regulation from IRS Topic 453, the financial Institutions follow this regulation, and they have done everything correctly to comply with IRS regulation. All the financial institutions' bad debts are from their business, so they have the right to deduct the total amount of their business's bad debt but must deduct it in the same year that bad debt happens. That is when the debt accounts showed charged-off. For other businesses, after they follow this regulation, the transactions stop here because they get relief from the IRS as tax credits, and most business entities don't have many volumes of this kind of account, nor will it happen regularly. But different from Financial Institutions, their primary business transaction is to loan customers funds in various financial products such as Credit Cards, Mortgages, Personal loans, Business loans, etc. The bigger the financial institutions, the more loan accounts they will have, and the more loan accounts they have, the more significant number of them become bad debts, which happen regularly every year.

When Bad Debt happens to financial institutions, they have the right to the same as all small businesses, as IRS Topic 453 allows them to deduct their total amount as business expenses. Still, the only wrong is they do not stop the transactions there like the other businesses do after they get relief. Because they still have the legal documents as a " Loan Agreement," and in the regulation, IRS Topic 453 is incomplete, and the transaction for the NPL accounts after they are used for an income tax deduction is not included. The transaction after the deduction led to all the issues and became a big problem in The United States. The Researcher's dissertation will focus on those transactions to delineate all details with a practical plan and goals to fix this issue reasonably for all the parties.

Conclusion

Slogan Correcting The Conflict with Laws and Reimburse The Fairness to Consumers.

Which Part of the Debt Collection System Needs Reconstruction?

The Goals of National Project.

1. Reimburse fairness and prevent the new one from falling into this Malicious Financial Trap.

2. Provide a fair and sincere pathway for the debtors to resolve their indebted life crisis and get a second chance in their credit lives.

3. Implement new laws and financial regulations to bridge the gap between funds and the United States.

4. Collect the funds of 12.7 billion dollars in the debt collection industries that belong to The United States.

5. Cut the connection of debt collectors's networking to prevent the conflict of interest.

Financial Laws and Regulations

The Financial Institution must understand the new rules, and Financial Institutions have two choices to make decisions for each NPL account.

Choice 1 is to use the total amount of the debt balance to file as expenses for the income tax deductible to receive the total amounts in the tax credits form. After using that account to file, The Creditors must lack legal rights to exercise that account or offer that account for sale to the Debt Collection Companies because that account is considered paid off by The United States and will transfer to the United States to collect the funds.

Choice 2 Financial Institutions have the right to collect the debt amount on their debt collection system but must comply with the debt collection regulations from The FTC, The CFPB, and state laws. The NPL account must not be qualified to be used for files as Income Tax deductible. Seeking double benefits violates financial regulations, and must face penalties and punishment by paying back the double amounts to the USNDCB(The United States National Debt Collection Bureau) as a penalty if found. In the NPL accounts used to file as expenses, the creditor cannot pursue the debtors who own that account. Only The

United States has the right to exercise legal action. To reconstruct the debt collection system, the new Federal Agency will take care of this account by providing a fair and transparent pathway for the debtors to pay off the debt according to the guidelines from this Agency. Once the debtor gets into the government program for debt settlement, it's guaranteed this pathway is correct. It is the pathway to lead the debtors to a second chance to reestablish their credit if they follow the steps and complete the payment setup.

Audition formulation: If the funds belong to The United States, no one can take them, only The United States. It's the law. Based on the *IRS 7-year audit regulations (Topic 305),* The business that transacts business in the United States must keep the documents back to 7 years in case of the audition. The new federal agency wants to see those documents from all financial institutions. The new Federal Government Agency will take the duty of the Audition Agency for this event. The amount added up from illegal calculation must return to The United States plus 33% on top of the amount considered as the penalty. Since the transactions happened from the unclear IRS regulation Topic 453, caused the system confusion and led to the whole system being messed up, any criminal offense will be forgiven to all financial institutions. The USNDCB Administrators will recalculate each NPL account based on the legal formulation that the law allows to charge the fee and interest rate within 6 bill cycles of each account. The amount from the recalculation will be minus the balance of each account that the financial institutions put in Form 1099 when they file each account as a bad debt deduction. If both amounts on the Form 1099 and the recalculation amount are equal, that account complies with the law nothing needs to be paid back nor any penalty on the account, but if the amount on the Form 1099 is higher than the recalculation number, that amount is the amount that the Financial institution who illegally calculate and charged the fee that law isn't allowed must pay back to the United States plus 33% on top of it as penalty.

- The Debt Settlement Companies still allowed them to be in the system, but their only product is their Settlement Contract Program, which needs to be under the new rule. After the Company signs the agreement with the debtors if the debtor continues paying their debt payment at the amount in the agreement, the goal must be reached; that means all responsibility will fall to the company if the debt listed in the contract can not be paid off from all the payments that the company set up for the debtor before enrolling them in the program. In contrast, if the company doesn't make confident that the instrument in the contract can become a reality, then do not offer the documents to the system once the contract is provided to the system; laws must recognize the company is confident to be a representative of the debtor and manage the debt to pay off, only.

Appendix J

How to Implement the Solution.

Establishing a New Government Agency.

The reconstruction plan is to Establish a new Federal Agency, The USNDCB (The United States National Debt Collections Bureau), to be the Agent that runs the one-stop service from oversight of the debt collection system to collect funds for the United States. The project plan needs The UDSNCB to be the destination to bridge The IRS regulation Topic 453 Bad Debt Deduction by putting this New Agency as the destination of those NPL accounts after deduction. The USNDCB will manage those accounts after being transferred by the following steps: it will automatically cut the connection between the debt collectors and their networking to prevent all conflicts of interest that may happen from the connections. The USNDCB will provide a sincere pathway for the debtors to meet their goals in the project plan. The *USNDCB Debt Resolution will* be a clear path for the debtors to reach their second chance of reestablishing their credit. The practical plan, "USNDCB Debt Resolution Program," will be the pathway for the debtors to meet their goals and pay their debt to the United States meticulously. These steps need to pass legislation by Congress, and laws need to be enacted for the first step of the reconstruction to kick off.

According to The CFPB Final Rules (2020), the debt collection industry has 12.7 billion dollars worth, and the debt collectors who bought the NPL debt from financial institutions can only collect 3.5 billion dollars. That may be from the debt collector's bad image, and the debt balance system was untrusted by the debtors, leading them to ignore those debts. If we have the cleared pathway of how their debt after default will transfer to the Government Agency that they can trust and will provide them with the truth of their debt balance, with the debt resolution program for them to resolve their debt in the affordable monthly rate the number of the funds that can be collected in this industries will raise more than 3.5 billion dollars or close to 12.7 billion dollars in the future. But we might expect to see the 12.7 billion dollars decrease because this funds amount is included in the illegally added up to the NPL accounts balance.

As we should see by now, The USNDCB only needs a chance of law to create this organization. This government agency has huge revenues it has been waiting for; this organization will not cost anything from the Federal Government. Instead, the agency will collect funds for the federal government to create more jobs, guaranteeing that this agency will have revenues to cover all employees' salaries and other expenses. All the issues in our debt collection system that have been messed up and conflicted with the law for history will be resolved.

Extended The IRS Regulation Topic 453 Bad Debt Deduction.

All the issues in our debt collection system begin from the regulation in Topic 453, which does not get into the deeper business profile of each type of business. The Bad Debt may come from various sources in each business type, but overall, they comply with IRS regulations.

Only one type of business is unique compared to the other types of businesses in Topic 453. The nature of the financial institutions is to loan money and issue credit to consumers. In loaning funds, it will generate the NPL(Non-Performing Loan) accounts regularly in a year and a large volume; the more significant the organization they are, the larger the NPL accounts will be. We need to have the section part in Topic 453, Bad Debt Deduction/ Financial Institutions, because one rule will not fit all types of businesses.

"The extended part of this topic that needs to be extended is to add the specific direction of the NPL accounts after used to filed as bad debts deduction must considering those accounts paid off by the United States because the filler will receive the full amount relief as a tax credit the Financial Institutions must lack of legal ground to exercise in the account after filling. After filling, The Financial institution must submit the summary of Form-1099 with copies to The USNDCB before May 15 th of every year [use form USNDCB#0002/2024] The NPL accounts after filling deduction as bad debts will be transferred to under the authority of the Government Agency "The USNDCB"(United States National Debt Collection Bureau) www.USNDCB.gov The NPL account's owner must contact the agency through their website ASAP or call for more information at 02-515-9999 ext. 3010, Debt Relief Option is available. *** The NPL account's owner, please be aware that the account details will be completely available to the USNDCB after June 15 th of the same year at the account defaulted "

Summary of Awards and Honors the Nominee has Received

Summary of Awards and Honors the Nominee has Received

After finishing the research, I created the Utility Patent, " The Resolution Debt Collection System Reconstruction." and used it as

The supplemental Document supports the lawsuit against the financial institution and its Attorneys at The Chancery Court of the State of Delaware.

To Prove my theory and to free myself of the malicious financial trap, I filed a lawsuit against the financial institution and its Attorney. I used the documents as supplemental documents to support the lawsuit filed at The Chancery Court of the State of Delaware CA# 2023-0536 as evidence. The lawsuit is still in court proceedings but should be ended soon with the chance for the court to award The Compensatory and The Punitive Damage in the amount of $146,000,000(One Hundred Forty-Six Million Dollars)

Attached is a Writing Sample for the Ph.D. in Public Policy Program application at George Mason University SCHAR School of Policy and Government.

I plan to use this Utility Patent as my Ph.D. Dissertation at The Ph.D. in Public Policy Program at SCHAR School of Policy and Government at George Mason University. The Proposal qualified me for the program with the Graduate Inclusion & Access Scholarship offered by The Office of The Provost.

Appendix J

The Graduate Inclusion & Access Scholarship seeks to support the growth and development of an inclusive, thriving graduate community across all academic programs at George Mason University.

At Mason, we believe "diversity is our strength." An inclusive graduate student community is essential to enhance the quality of the intellectual environment for all our students and faculty. This scholarship is awarded on a competitive basis and is open to students who:

1. Are domestic first-generation college students from an underrepresented population within their doctoral field of study at Mason

2. Are accepted as new, incoming, full-time fall semester doctoral degree students

3. Have a cumulative GPA of 3.3 or better

4. Have demonstrated financial need

Financial support includes a stipend of $33,000 over 12 months, tuition support, and subsidized health insurance.

Patents and Plublications.

The Solution Debt Collection System Reconstruction.
The Urgent Project to Assist Minority's Victims.

The Goals of the Project.

1. Reimburse fairness and prevent the new one from falling into this Malicious Financial Trap.

2. Provide a fair and sincere pathway for the debtors to resolve their indebted life crisis and get a second chance in their credit lives.

3. Implement new laws to bridge the gap between funds and the United States.

4. Collect 12.7 billion dollars in the debt collection industries that belong to The United States.

5. Cut the connection of debt collectors's networking to prevent the conflict of interest.

Establishing a New Government Agency.

The reconstruction plan is to Establish a Federal Agency, The USNDCB (The United States National Debt Collections Bureau), to be the one-stop service Agent from oversight of the debt collection system to collect funds for the United States. The project needs The UDSNCB to be the destination to bridge The IRS regulation Topic 453 by putting this New Agency as the destination of those

NPL accounts after deduction. The USNDCB will manage those accounts after being transferred by the following steps: it will automatically cut the connection between the debt collectors and their networking to prevent all conflicts of interest and provide a sincere pathway through The USNDCB Debt Resolution for the debtors' second chance of reestablishing their credit and paying debt to the United States meticulously.

Extended The IRS Regulation Topic 453 Bad Debt Deduction.

All the issues begin from Topic 453, which does not get into the deeper business profile of each type of business. Overall, they comply with IRS regulations. Only one type of business is unique compared to the others. Financial institutions are to loan money and issue credit to consumers. In loaning funds, it will generate the NPL accounts regularly. The more significant the organization they are, the larger the NPL accounts will be. We need to have the section in Topic 453, Bad Debt Deduction/ Financial Institutions because one rule will not fit all.

"The United States needs to add the specific direction of the NPL accounts after used to filed as bad debts deduction must considering those accounts paid off by the United States because the filler will receive the full amount relief as a tax credit the Financial Institutions must lack legal ground to exercise in the account after filling and must submit the summary of Form-1099 with copies to the USNDCB before May 15th of every year [use form USNDCB#0002/2024]. After filing deductions, the