



SUSPEND (FHFA) 2025-2027 Enterprise Housing Goals for citing bad law (DIED)

10/24/2024, Thursday

SENT VIA EMAIL

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Sandra L. Thompson, Honorable Director
**Federal Housing Finance Agency (FHFA) –
Purported Conservator of Fannie Mae / Freddie Mac**

RE: RIN-2590-AB34 – DOC #2024-19261- PROPOSED RULE

**DEMAND “SUSPEND” (FHFA) 2025-2027 Enterprise Housing Goals - Why?
FHFA citing bad law- “DIED”**

Hello Ms. Thompson, Honorable Director, (FHFA) & Staff:

Moffatt Media (OPM) Federally Recognized Taxpayer Watchdog News, on behalf of Taxpayer’s, Shareholder’s, Retiree’s, & Veterans submit this Public Comment

to: **“DEMAND AND SUSPEND”** (FHFA’s) 2025-2027 Enterprise Housing Goals.

Why: Because FHFA’s projected 2025-2027 Enterprise Housing Goals consist of citing bad law with detrimental reliance on law that NEVER became law. **FHFA citing bad law that “DIED!”**

Within FHFA’s proposed 2025-2027 Enterprise Housing Goals and claims statutory authority pursuant to the **“Federal Housing Enterprises Financial Safety and Soundness Act of 1992,”** as follows:

Paragraph Summary Page 1, Lines: 3-4 reads in pertinent part:

... **“2025 through 2027 as required by the Federal Housing Enterprises Financial Safety and Soundness Act of 1992,”** which is bad law being cited. **See below:**

12 CFR Part 1282

RIN 2590-AB34

2025-2027 Enterprise Housing Goals

AGENCY: Federal Housing Finance Agency.

ACTION: Proposed rule.

SUMMARY: The Federal Housing Finance Agency (FHFA) is issuing a proposed rule and requesting comments on the housing goals for Fannie Mae and Freddie Mac (the Enterprises) for 2025 through 2027 as required by the Federal Housing Enterprises Financial Safety and Soundness Act of 1992. The housing goals and subgoals include

Source Links

https://www.fhfa.gov/sites/default/files/2024-08/2025-27_enterprise_housing_goals_npr_for_web.pdf

<https://www.fhfa.gov/regulation/federal-register/proposed-rulemaking/2025-2027-enterprise-housing-goals>

FHFA's reliance on the 1992, Federal Housing Financial Safety and Soundness Act, places FHFA's conduct operating outside the scope as an administrative independent agency, non-governmental entity.

1992 Phantom Law entitled: **Federal Housing Financial Safety and Soundness Act of 1992** **"PASSED"** the House, but **"DIED"** at the Senate Level.

The 1992 President at the time also did not sign into law the **Federal Housing Financial Safety and Soundness Act of 1992**. See #1 Source [Congress.gov](https://www.congress.gov) below:

The screenshot shows the legislative page for H.R. 6094 on Congress.gov. The title is "H.R. 6094 - Federal Housing Enterprises Financial Safety and Soundness Act of 1992" from the 102nd Congress (1991-1992). The sponsor is Rep. Gonzalez, Henry B. (D-TX-20), introduced on 10/02/1992. The bill was passed by the House on 10/08/1992. The tracker shows the bill was introduced and passed by the House. The subject area is Finance and Financial Sector.

<https://www.congress.gov/bill/102nd-congress/house-bill/6094>

See #2 Source: [Govtrack.us](https://www.govtrack.us) below:

Introduced Oct 2, 1992
102nd Congress (1991–1992)

Status **Died in a previous Congress**

This bill was introduced in a previous session of Congress and was passed by the House on October 3, 1992 but was never passed by the Senate.

Although this bill was not enacted, its provisions could have become law by being included in another bill. It is common for legislative text to be introduced concurrently in multiple bills (called companion bills), re-introduced in subsequent sessions of Congress in new bills, or added to larger bills (sometimes called omnibus bills).



Sponsor



[Henry González](#)

Representative for Texas's 20th congressional district
Democrat

History

- OCT 2, 1992  **Introduced**
Bills and resolutions are referred to committees which debate the bill before possibly sending it on to the whole chamber.
- OCT 3, 1992  **Passed House (Senate next)**
The bill was passed in a vote in the House. It goes to the Senate next. The vote was by voice vote so no record of individual votes was made.

See Source: <https://www.govtrack.us/congress/bills/102/hr6094>

This public comment and **DEMAND TO SUSPEND** has a nexus to: RIN-2590-AB34. Entitled: 2025-2027 Enterprise Housing Goals. Proposed Rulemaking, 12 CFR Part 1282 “as required by the Federal Housing Enterprises Financial Safety and Soundness Act of 1992.”

Source Link: <https://www.fhfa.gov/regulation/federal-register/proposed-rulemaking/2025-2027-enterprise-housing-goals>

Furthermore, Taxpayer’s, Shareholder’s, Retiree’s & Veteran’s also issue this Demand document against (FHFA,) to SUSPEND, it’s Proposed Rule: 2025-2027 Enterprise Housing Goals, due to having a pattern and practice of regurgitating and imposing phantom law, against Fannie Mae and Freddie Mac.

Importantly noting, through mistake or inadvertence FHFA, neglected to verify if the “Federal Housing Enterprises Financial Safety and Soundness Act of 1992,” was good or bad law.

[T]he **“Federal Housing Enterprises Financial Safety and Soundness Act of 1992,” DIED** at the Congressional Senate level. Therefore the ... Safety and Soundness Act of 1992, is unconstitutional and may ‘NOT’ be used in reliance for developing FHFA’s projected 2025-2027 Housing Goals to be imposed on Fannie Mae and Freddie Mac. Therefore, **Suspend your** proposed 2025-2027 Enterprise Housing Goals, **until there is Judicial Review or FHFA amend with corrective action to use a** statutory authority, that is NOT bad law.

SIDEBAR PARTING CONFLICT QUESTION:

Whether FHFA is wearing Conservator-Receivership shoes on Fannie Mae & Freddie Mac, that conflicts with being a Conservator, Non-governmental administrative agency and Regulator?

Even the slightest appearance Conflict of Interest, may cause an adverse fundamental constitutional Separation of Powers issue for FHFA. Moffatt Media is just asking the above sidebar question on behalf of Taxpayer’s, Shareholders. ...

WHEREFORE, Taxpayer’s, Shareholder’s, Retiree’s & Veteran’s’ submit good cause for issuing this Public Comment **DEMAND FOR FHFA TO SUSPEND, it’s Proposed Rule 2025-2027 Enterprise Housing Goals,** for all the reasons stated above.

DEMAND “SUSPEND” PROPOSED RULE 2025-2027 ENTERPRISE HOUSING GOALS UNDER THE AUTHORITY TWO RECENT UNITED STATES SUPREME COURT CASES

Noting, two recent decisions of the United States Supreme Court expose, and now declare unlawful, administrative agencies such as: (FHFA) that take actions against

Taxpayer Citizen's ... that affect their private rights. *SEC v. Jarkesy*, 144 S. Ct. 2117 (2024); *Loper Bright Enters. V. Raimondo*, 144 S. Ct. 2244 (2024).

In *Jarkesy*, the Court found that agency power cannot strip a Taxpayer of Constitutional rights. In *Loper*, the Court found that the courts cannot give deference to agency rulings on matters of law overruling the *Chevron* doctrine.

In *Jarkesy*, the Securities and Exchange Commission (SEC) initiated an administrative adjudication against Jarkesy for securities fraud and sanctions. When this case made it to the United States Supreme Court, the actions by the administrative court were reversed.

In *Loper*, the United States Supreme Court overruled the *Chevron* doctrine which required the 'reviewing court' to give binding deference to the agency on questions of law and interpretation of the law in its adjudications. The Supreme Court opined in *Loper* that it was the 'proper and peculiar province of the courts' to interpret the law, *not the agency*.

The mindset of the United States Supreme Court would be the same in application to (**FHFA**). Therefore, the court had to decide all relevant questions of law and interpret statutory provisions. *Loper Bright Enterprises, et al. v. Raimondo, Secretary of Commerce, et al.*, 144 S. Ct. 2244 (June 28, 2024)

In *Loper*, the state governments argued that the *Chevron* deference doctrine should be abandoned and argued that the 'broad deference' standard motivated agencies to wield vast powers. The states all agreed that it is the judiciary's role to have the final say in what the law is, even when an agency is involved and this would include: (**FHFA**).

For all the foregoing reasons mentioned above, Taxpayer's, Shareholder's, Retiree's & Veterans **OPPOSE** (FHFA) 2025-2027 Enterprise Housing Goals and **DEMAND** FHFA "**SUSPEND**" 2025-2027 Housing Goals or modify its Proposed Rule, supported with future good law, rather than phantom law, due to the 1992, Federal Housing Financial Safety and Soundness Act, which NEVER BECAME statutory Public Law.

The 1992 Federal Housing Financial Safety and Soundness Act, **DIED at the Senate and was "NOT" signed into law by President George H. W. Bush.**

Moffatt Media on behalf of Taxpayer's, Shareholder's, Retiree's & Veteran's look forward to hearing back from you (FHFA), promptly regarding the above

OPPOSITION-DEMAND- “SUSPEND,” and amicably to mitigate 2025-2027 Enterprise Housing Goals of (FHFA).

FHFA’s continuing to rely on *phantom law* of Federal Housing Enterprises Financial Safety and Soundness Act of 1992, then FHFA is exceeding its statutory authority by failing to uphold good law to substantiate the proposed 2025-2027 Enterprise Housing Goals of (FHFA).

SOURCE LINKS

<https://www.fhfa.gov/sites/default/files/2024-10/10%2016%202024%20TUESDAY%20RE%20OPPOSE%20FHFA%202025%202027%20BENCHMARKS%20PUBLIC%20COMMENT.pdf>

<https://www.fhfa.gov/comment-page/631911>

<https://moffattmedia.com/fhfa-cease-and-desist-conservatorship-over-fannie-mae/>

CONCLUSION

➤ **WHEREAS Taxpayer’s, Shareholders, Retirees & Veteran’s**

OPPOSITION-DEMAND- “SUSPEND” proposed 2025-2027 FHFA’s Enterprise Housing Goals, until there can be Judicial Review before a Court of Record or FHFA modify its proposed 2025-2027, supported with good statutory law.

For all the foregoing reasons mentioned above you (FHFA), must “SUSPEND” 2025-2027 Enterprise Housing Goals, to prevent prejudicial Housing Goals based on bad law: 1992 **Federal Housing Financial Safety and Soundness Act of 1992** “PASSED” the House, but “DIED” at the Senate without Senate majority Votes.

If you have any questions, please feel free to contact myself as CEO of Moffatt Media.

Sincerely,

/s/

Moffatt Media Taxpayer Watchdog News,
Star Moffatt, CEO of Moffatt Media

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