



October 16, 2024, Wednesday

SENT VIA EMAIL

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

RE: RIN-2590-AB34 – DOC #2024-19261-

**Taxpayer's ... OPPOSE (FHFA) 2025-2027 Benchmark Housing Goals Omits
16 year TERMINATION of CONSERVATORSHIP**

Dear Ms. Thompson, Honorable Director & (FHFA):

Moffatt Media (OPM) Federally Recognized Taxpayer Watchdog News,
on behalf of Taxpayer's, Shareholder's, Retiree's, & Veterans submit a public
comment to OPPOSE (FHFA) 2025-2027 Benchmark Housing Goals.

Why: Because FHFA's projected 2025-2027 Housing Goals **OMIT to
include ANY benchmarks for TERMINATION of CONSERVATORSHIP**
against Fannie Mae and Freddie Mac corporations.

Moffatt Media on behalf of Taxpayer's, Shareholder's, Retiree's, &
Veteran's DEMAND, that (FHFA), immediately Cease & Desist
CONSERVATORSHIP against Fannie Mae & Freddie Mac, inclusive within
FHFAs 2025-2027 Housing Goals. DOC #2024-19261

Recall (FHFA) your role is of an administrative agency and that's it! However, only as a mere administrative agency, you imposed **CONSERVATORSHIP** against Fannie Mae and Freddie Mac corporations, who have NEVER been criminally indicted or convicted of committing any crimes against the United States of America, Taxpayer's, Shareholder's, Retiree's & Veteran's.

Thus, the United States Supreme Court has sounded its horn about administrative agencies, which would include (FHFA), in 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); and *Loper Bright Enters. V. Raimondo*, 144 S. Ct. 2244 (2024).

Note throughout this Public Comment Demand Letter “Cease & Desist,” document, Fannie Mae and Freddie Mac, will be referenced: Fannie/Freddie.

Treat this timely Public Comment being submitted before (FHFA), on behalf Shareholders, which make up: Taxpayer's, Retiree's, & Veterans, do **OPPOSE** FHFA's 2025-2027 benchmark goals.

Proper administrative guidance, not punishment should be the goal of (FHFA) moving forward with terminating Conservatorships against Fannie / Freddie and inclusive of your 2025-2027 Housing Goals!

Recall in the year 2008 and now fast forward 2024, Shareholders have been denied their Shareholder Rights to Vote, for the continued Conservatorships against Fannie/Freddie. Another denial of Shareholder Rights to Vote within FHFA's proposed 2025-2027 Enterprise Housing Goals, is a smack in the face among all Shareholders by not valuing Shareholders. <https://www.investopedia.com/terms/s/shareholder-value.asp>

Without the Shareholders best interest corporations like Fannie/Freddie would not exist, because Shareholders contribute revenue for reinvesting, building up and expanding continued growth of corporations such as: Fannie/Freddie. Shareholder's do in fact have a value to Fannie/Freddie and should not be excluded from FHFA's 2025-2027 Housing Goals projected benchmarks.

This public comment 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>

There has never been ANY criminal liability imposed against Fannie or Freddie and as such (FHFA), your **Conservatorship** actions from 2008 through 2024, **now 16 years imposed, is only a mere administrative action against Fannie/Freddie.** Therefore the Conservatorships against Fannie / Freddie has been without good cause, illegal and warrants immediate **TERMINATION of CONSERVATORSHIP imposed against Fannie/Freddie.**

Furthermore, Taxpayer’s, Shareholder’s, Retiree’s & Veteran’s also issue this Demand Letter against (*FHFA*) to *Cease and Desist* the unconstitutional pattern and practice of sweeping over profits into the United States Treasury, without consent of Taxpayer’s, Shareholder’s Retiree’s & Veteran’s. Because the sweeping of Fannie Mae and Freddie Mac profits are being done on an administrative Federal Conservatorship level, that is not in compliance with the Federal Administrative Procedure Act (APA).

(FHFA) your proposed 2025-2027 Housing Goals have actually been ongoing and in origin from the actual 2008 HOUSING AND ECONOMIC RECOVERY ACT, better known as HERA, that was imposed on Fannie / Freddie.

Yet the HERA Act of 2008 seems nothing more than a taking of corporations Fannie / Freddie, with an illegal regressive redistribution of Profits. Banks got bailed out while Taxpayer’s, Shareholder’s Retiree’s & Veteran’s and Disabled got wiped-out.

More importantly, the ongoing sweeping of Fannie Mae and Freddie Mac profits are being done in conflict with two recent landmark U.S. Supreme Court cases that will be depicted below in more detail.

Fannie Mae and Freddie Mac Taxpayer’s, Shareholder’s Retiree’s & Veteran’s **OPPOSE** FHFA’s 2025-2027 Enterprise Housing Goals, for failure to include at least a proposed benchmark to **TERMINATE** Fannie Mae and Freddie Mac from Conservatorship 1st Quarter ending 2025. The same Conservatorship that did not have a reasonable minded term Conservatorship for the true meaning of “*Temporary.*” Conservatorship. Instead having a “*Permanent*” Conservatorship of 16 years now (2008-2024) and round up 20 years.

Furthermore Government documents do NOT indicate there was a public Shareholder vote for the government administrative agency named: Federal Housing Financing Agency (FHFA), to impose [\(2008-2024\) Conservatorship against Fannie Mae & Freddie Mac.](#)

WHEREAS SHAREHOLDERS of Fannie Mae and Freddie Mac, do agree and demand that [\(FHFA\)](#) immediately “Terminate” the sixteen (16) year Conservatorship against Fannie Mae & Freddie Mac.

WHEREAS SHAREHOLDER’S do agree (FHFA) to IMMEDIATELY “Cease & Desist,” sweeping all profits of Fannie Mae and Freddie Mac, into the U.S. Treasury, without good cause and without a National Emergency being declared from 2008 to presently 2024.

WHEREAS SHAREHOLDER’S do collectively agree that (FHFA) “Cease & Desist” sweeping schemes of Shareholder Dividends into the U.S. Treasury, because from 2008 to presently 2024, there has not been ANY U.S. President to justify Dividend sweeping schemes via through a National Emergency.

This document is a Taxpayer’s, Shareholder’s Retiree’s & Veteran’s demand that (FHFA), cease and desist the unconstitutional practice of an Administrative Conservatorship over the Fannie and Freddie from 2008 to present October 2024. Because the Conservatorship did not receive ANY approval from Shareholders ... within the Fannie or Freddie corporations.

Do you know (FHFA), that all administrative agencies whether in the executive, judicial, or legislative branch have been stripped of authority to adjudicate the private rights of Taxpayer Citizen’s by the United States Supreme Court?

DEMAND IS MADE UNDER THE AUTHORITY TWO RECENT UNITED STATES SUPREME COURT CASES

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 Housing Goals.

WHEREAS Taxpayer’s, Shareholders, Retirees & Veteran’s issue this Demand letter document to immediately Cease and Desist, the Administrative Conservatorship over Fannie Mae and Freddie Mac, because the Conservatorship was done without Shareholder-Voter Approvals. Failure by (FHFA) to uphold this Cease and Desist the illegal Conservatorship, which adversely impacts Taxpayer’s, Shareholder’s ... will be forced next to file a court action against (FHFA), for an Emergency Injunction Temporary Restraining Order, (**TRO**).

CONCLUSION

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 Public Comment, that can be resolved amicably to mitigate 2025-2027 Benchmark Housing Goals of (FHFA).

Hence, at the end of said day, **(FHFA), you're only a mere administrative agency and NOT a 'Court of Record,'** to interpret constitutional laws or impose Conservatorships that are NEVER ending over ANY corporations, including Fannie Mae and Freddie Mac.

Sincerely,

/s/

Moffatt Media Taxpayer Watchdog News

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