

**IN THE STATE OF MICHIGAN
IN THE 48TH JUDICIAL DISTRICT COURT**

DLJ Mortgage Capital, Inc
OF KNOWN ADDRESS Plaintiff,

Case No: 24-33510-LT
JUDGE MARC B. BARRON

PLAINTIFF'S ATTORNEY
ERIN R. KATZ (P71604)
DYKEMA & GOSSETT. PLLC 39577
WOODWARD AVE. SUITE 300
BLOOMFIELD IDLLS, MI. 48304 (2

V.

AKIB A. ABIOLA (PRO SE)
7548 PROMONTORY POINTE
WEST BLOOMFIELD, MI. 48322
Ph#: (248) 982-4672,

Defendant

**JUDICIAL NOTICE OF CRIMINAL COMPLAINT FILED AGAINST LAURA BAUCUS
ERIN KATZ AND DYKEMA AND GOSSETT WITH THE WEST BLOOMFIELD
POLICE DEPARTMENT ON OCTOBER 17, 2024.**

Defendant, Akib Abiola files this judicial notice to notify this court that on October 17, 2024 a criminal complaint was filed against Laura Baucus, Erin Katz and Dykema & Gossett, PLLC.

That the complaint was accompanied with a sworn affidavit from defendant, Akib Abiola (Exhibit 1).

That the police was informed that Americans Against Foreclosures in conjunction with other Civil and Human Rights organizations will hold peaceful protests against the perpetrators of fraudulent foreclosure and the illegal takeover of the Abiola's property.

That this court was aware of the fraudulent acts by these individuals but failed to act appropriately.

That this court was aware that the attorney who executed the fraudulent Sheriff's sale left the law firm after she was confronted with perjury, misrepresentation and misconduct allegations.

Therefore, with the above facts and evidence, together with the fact that the defendants supported their criminal complaint with an affidavit, that this court must not provide further cover and immunity for Ms. Laura Baucus to continue with her criminality.

This court must hold Laura Baucus and her law firm accountable.

Being a counsel to a lender does not give any attorney any blanket right to foreclose on a borrower's property.

There are specific government laws, regulations and procedures that must be followed before a home can be foreclosed. This court has been intimated on numerous occasions that Laura Baucus and her partners at Dykema never followed these government laws and guidelines but obstructed them.

No attorney has the power to obstruct these government laid down guidelines and this court must not give Laura Baucus the impression and the power to believe that she's above the law.

Dated: October 17, 2024


Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Akib Abiola", written over a horizontal line.

Akib Abiola, Pro Se
7548 Promontory Pointe
West Bloomfield, MI 48322
Phone#: 248-982-4672
Email: aakib@aol.com

CERTIFICATE OF MAILING

I hereby certify that a copy of the foregoing was electronically filed with the State of Michigan, 48th District Court and that a copy was sent on the 17th day of October, 2024.


Akib Abiola

And by email to:

Select Portfolio Servicing, Inc.
Cameron Ward, Registered Agent
3217 S. Decker Lake Dr.
Salt Lake City, Utah 84119
Email: relationshipmanager@spservicing.com
Phone: 866-801-8177, 800-258-8602

DLJ Mortgage Capital, Inc.
11 Madison Ave
New York, New York 10010

JP Morgan Chase Bank, N. A.
270 Park Ave
Manhattan, New York 10017-2014
Phone: 212-622-4508

DYKEMA GOSSETT PLLC,
Laura C. Baucus, Attorney
Samantha L. Walls, Attorney
Claimed Counsel for Select Portfolio Servicing, Inc. and DLJ Mortgage Capital, Inc.,
39577 Woodward Avenue, Suite 300
Bloomfield Hills, MI 48304,
Ph# (248) 203-0700,
Email: Lbaucus@dykema.com

EXHIBIT 1



WEST BLOOMFIELD PD
4530 WALNUT LAKE RD
WEST BLOOMFIELD, MI 48323
TEL. 248-975-9200
FAX 248-682-1811

OFFICER NOTIFICATION

OFFICER: Engel
BADGE: 013
INCIDENT #: 24-18106
DATE: 10/17/24
TIME: _____

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AGAINST
LAURA BAUCUS, ERIN KATZ AND DYKEMA AND GOSSETT, PLLC.**

RE: 7548 Promontory Pointe, West Bloomfield, Michigan 48322

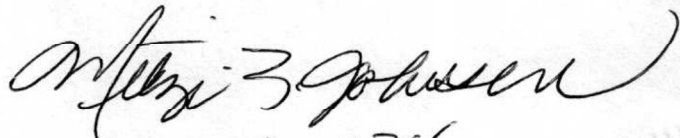
I, Akib Abiola make this affidavit under the penalty of perjury and declare that the following statements are true:

1. That DLJ Mortgage Capital does not own the Note to my property at 7548 Promontory Pointe, West Bloomfield, Michigan 48322.
2. That the mortgage debt on my property above has been paid in full by Fannie Mae
3. That the loan on my property was fraudulently originated and closed by North American Mortgage and assigned to Washington Mutual (WAMU) on September 11, 2001.
4. That the loan on my property was part of the loans that Chase Bank rescued from WAMU and was included in \$20 billion bailout money given to Chase by the federal government.
5. That Chase was mandated to modify our loan from the predatory rate of 6.875% as part of the rescue program.
6. That DLJ or SPS does not have the original Note and the original mortgage deed on my property above.
7. That the copies of the Note and mortgage deed that were presented to the Oakland County Sheriff Civil Division by Attorneys at Dykema and Gossett; Laura C. Baucus and Erin Katz have been altered from the original documents.
8. That there has been a break in the chain of title for my property at 7548 Promontory Pointe, West Bloomfield, Michigan 48322.
9. That we had demanded to see the original Note on our property from SPS, DLJ and Dykema and that our request was denied.
10. That based on the information that has been provided to us that we believe that neither DLJ or SPS have the original Note on our property.
11. That DLJ is a fraudulent company with no known address.
12. That DLJ is not a tenant at the address 11 Madison Avenue, fourth floor, New York, NY 10017 given to us by SPS and Laura Baucus as their address.
13. That all government agencies that we have filed a complaint against DLJ with have informed us that they have not been successful in contacting them.
14. That DLJ never gave any authorization to Laura Baucus, Erin Katz or Dykema to foreclose on our property.

15. That we never received any notification from DLJ that it has engaged Dykema and its attorneys to foreclose on our property.
16. That we never received any notice from Dykema informing us that it has been engaged to foreclose on our property.
17. That no settlement agreement on the property is binding on Gerritha Abiola the primary borrower and co-owner of the property
18. That we were denied our rights to rescue any deficiencies on the loan on the property prior to the Sheriff's sale.
19. That Select Portfolio Servicing Inc (SPS) specifically informed me several times on recorded telephone conversations and in writing that it did not authorized Dykema or Laura Baucus, Erin Katz or any of its attorneys to foreclose on my property.
20. That on January 8 and January 9, 2024 that I was on a conference phone call with representatives of SPS the servicer of the loan who tried several times to connect with Laura Baucus on the call to inform her not to proceed with the Sheriff's sale and that Laura avoided their calls and ignored the messages left on her voicemail.
21. That Laura Baucus and Erin Katz and other Attorneys and staff from Dykema filed false affidavits and proof of services in order to perpetuate fraud on my property.
22. That the Sheriff's sale of our property on January 9, 2024 by the attorneys of Dykema and Gossett was fraudulent and constitute a felony
23. That I made this affidavit in support of my criminal complaint against Laura Baucus, Erin Katz, Ryan VanOver and Dykema and Gossett PLLC at 39577 Woodward Avenue Suite 300, Bloomfield Hills, Michigan 48304

Sworn on this 17th Day of October, 2024


Akib A. Abiola


10-17-2024

MITZI Z JOHNSON
NOTARY PUBLIC, STATE OF MICHIGAN
COUNTY OF OAKLAND
My Commission Expires 03-11-2029
Acting in the County of Oakland

