

JUN 13 2024

## UNITED STATES COURTS OF APPEALS FOR THE SIXTH CIRCUIT

KELLY L. STEPHENS, Clerk

In re: EDWARD STEPHON WILLIAMS, Debtor

Case No. 23-10512

Hon: Judge Shalina D. Kumar

STUART A. GOLD, TRUSTEE

Plaintiff-Appellant

٧.

CAMILE V. WILLIAMS, GREGORY S. WILLIAMS and

CAMRON L. WILLIAMS

Defendants-Appellees

This is in response to the brief for Appeal of Stuart A. Gold, on the reversal of the Bankruptcy Courts February 22, 2023, Opinion and Order.

Response to the corporate disclosure statement:

The organization U-Snap-Bac, a non-profit organization and the realtor for U-Snap-Bac, Brian Caldwell were in place to purchase the home in question (18405 Prairie St Detroit Michigan) two (2) weeks before the final court date of May 17, 2023.

The actions of Stuart Gold, Elias Majoros, Jason Smalarz (all partners in the law firm Gold Lange Majoros and Smalarz) U-Snap-Bac, Brian Caldwell, and Judge Thomas Tucker, fall under the R.I.C.O act of 1970.

Also, may it be noted that the home in question was not acquired in 2019, that in fact it was acquired in 2011 and that the Williams family had lived there for 12 years without a mortgage.

In reference to Stuart Gold's statement regarding oral agreements, I believe that should the courts find cause for this case to continue Stuart Gold should be required to stand face to face with the people that he has so unjustly taken advantage of.

In the case of jurisdiction, a bankruptcy judge does not normally rule on Probate matters and does not exercise any possible authority and hence the reason for Probate courts, but this situation wasn't a normal, business as usual situation.

In a statement of the brief, Stuart Gold, mentions a claim of property transfer, in this case whether a property transfer was in effect, the children of Celia Williams, (Camile, Gregory, Camron) had claim in the property at 18405 Prairie Detroit Michigan, however that didn't conform to Stuart Gold's objective. Also, the defendants never received notice of Gold's complaint because Stuart Gold was sending important information to places and people that would interfere with timely responses.

In response to the agreement for Camile to purchase the property in April 2021 for the sum of Fifty Thousand Dollars (\$50,000) Gold fails to mention the rest of his extortion tactics, Five (5) weeks later on May 14, 2021 (the one he choose to mention) he presented a second purchase agreement for the sum of Seventy-Five thousand dollars (\$75,000).

As for the quit claim deed being a forgery, Stuart Gold never presented any evidence to substantiate his claim of said forgery, yet Judge Tucker allowed his statement to be entered in to record and accepted said statement as true. Stuart Gold also failed to mention the fact that his partner and co-conspirator Elias Majoros, started this entire debacle with deception when he did not divulge the truth about the exemption form, he coerced Mr. Edward Williams into

signing on or around 4/8/2021, and shortly after that the first purchase agreement was presented on or around 4/12/2021.

As for the sale of the property located at 18405 Prairie St Detroit Michigan, the buyer U-Snap-Bac (a supposedly non-profit organization) and Brian Caldwell, a realtor supposedly acting on behalf of u-snap-bac, were in place to buy the home from Stuart Gold well before the judge had made a final decision. Brian Caldwell contacted Edward Williams a month prior to May 17, 2023. Caldwell made a appearance at the home in question on or around April 14, 2023 and texted Mr. Williams on that same day of the 14<sup>th</sup> after leaving the home. On that day Caldwell presented a proposal of in his words, "cash for keys".

In reference to the home not being in Probate Court, there was never an issue of ownership as Camile, Gregory, Camron and their father (Mr. Williams) never had any debates about the home, everyone involved was still trying to come to terms with the loss of their mother and wife, Mrs. Celia Williams.

Stuart Gold and everyone involved in the immoral and unethical siege and consequential sell of the home shared by four (4) people was strictly for their own financial gain. Stuart Gold encountered a way to make money and totally took advantage of the situation and it was done by any means necessary.

Within the brief of appeal, Stuart Gold mentions by bankruptcy courts being federal courts that it supersedes Probate Courts, however under normal circumstances bankruptcy courts do not indulge in probate matters, yet in this instance the bankruptcy courts found the need to interfere with the normal balance of procedure. According to the Probate exception that says, federal courts lack subject matter jurisdiction to probate wills or to administer decedents' estates.... Markham v. Allen 326 U.S. 409, 494 (1946).

The administration of Michigan's intestacy statutes is within the province of Michigan's state courts. See Dean v. Dean, No.21-CV-02208,2021 WL 6689546, at \*2 (W.D. Tenn. Oct. 25,2021).

## CONCLUSION

This is a situation where people were misled, told falsehoods and taken advantage of, removed from their home without any consideration of their wellbeing and or future. Stuart Gold and his law firm partners were malicious, immoral and unethical. Now they want to hide behind what is clearly a misappropriation of power. Judge Tucker allowed Stuart Gold to abuse the sanctity of his position (U.S. Bankruptcy Trustee), while also disgracing his authority as a judge. In closing the plaintiffs ask that this court uphold the ruling of the District Court (Hon: Shalina D. Kumar) and all those responsible be held accountable for their devious actions.

Respectfully submitted by certified mail with return receipt request on June 11, 2024.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 11, of 2024 the brief of Camile Williams, Gregory Williams and Camron Williams was submitted by certified mail to the United States Court of Appeals for the Sixth Circuit and Stuart Gold/Appellant at the address below. And that all statements within the brief are submitted as true under the penalty of perjury.

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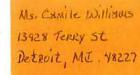
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> United States Sixth Circuit Court of APIL 100 East Fifth Street Cincinnati, Ohio, 45202

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