

## Fighting Ferrera, Camden, Maine and Amica for the Boundary Opinion



### Craig Brown's Home Lot #4

#### Home Purchase Ferrara Protective Covenants Violation / Harassment

After doing due diligence, Craig Brown bought a home in January of 1998 at 36 Stonehurst Drive, Camden, Maine 04 843 which included a Warranty Deed and Protective Covenants. The home was in the Stonehurst Subdivision developed by Parker Laite Senior, a Camden Town Father credited with fifty years of service with the Town of Camden. Brown procured

a Homeowners Policy that included a "Duty to Defend" clause for property damage with Amica Insurance Company, who he had been insured with since 1984.

In 2001, Brown's neighbor Ferrara put up a shed 20' from the common lot line in violation of the 25' setback required by Article 6 of the Protective Covenants. Brown called the Zoning Officer Nims, who inspected the setback violation and discovered that the Ferrara house was too big for the lot and in violation of the Protective Covenants set-back. Nims issued a written report, (Nims report) detailing the location of the Ferrara house at 21' +/- from the common lot line. (See Documents Group 1)

After further review of the subdivision, Brown realized that at least (5) other properties (Lots 5, 6, 7, 11, 12) were also in violation of the Protective Covenants. Ferrara and other Stonehurst residents immediately began harassing Brown, his property was vandalized and neighbors were constantly trying to threaten and intimidate Brown by driving by Brown's house staring him down. Brown tried to defend himself by attempting to file over (50) Police Reports from 2001-2002 but the Camden Police either distorted what was reported or did not file the report.

## Houses in violation of Protective Covenants









## Maine Law

Brown retained Attorney Eric Morse, who advised Brown to send Ferrara a letter. Brown declined, and (in my opinion) the lot lines of the Stonehurst Subdivision were illegally moved in 2002 in violation of Title 30-A, M.R.S.A. 4407 and the Camden Subdivision Ordinances Article 12 which require that all changes to approved subdivisions go through the Planning Board process to bring the Ferrara house into compliance with the Protective Covenants 25' set-back and cover up real estate fraud by the Laite family ([See Documents Group 2](#)) who sold lots with Protective Covenants but helped develop houses in Stonehurst that violated the Covenants.

The Lot line change invalidates the titles to the Brown and Ferrara lots, As title 30-A, N.R.S.A 4406. Do not allow the Sale of subdivision lots, that do not agree with the subdivision Plan. ([See Documents Group 2](#))









## Malicious Prosecution for Assault Adverse Possession Fabrication of Evidence



On December 26, 2002, the harassment came to a head after a mature tree and the post and rail lot line markers at the front corner of the lot common with the Ferrara property were ripped off Brown's lot. Brown took Ferrara to task verbally about the vandalism in his driveway and inadvertently ran into him. Although no blows were exchanged and neither man fell down on the snow-covered driveway, the Camden Police charged Brown with Felony Assault and Disorderly Conduct. Brown eventually pleaded guilty to disorderly conduct at the advice of Morse. (See Documents Group 3)

In 2003, while Brown was under a related Order for Protection, Ferrara's Attorney sent Brown a letter stating that he was going to erect a fence along the common lot line. Brown was working out of state, and at the advice of Attorney Morse did not take actions to stop the erection of the fence. Morse also advised Brown to have Good Deeds perform a simple boundary check of the lot (rather than a certified boundary survey), and Brown asked Good Deeds to determine how far the fence was from the Ferrara residence (25'+). Good Deeds sent Brown a survey drawing that was not required by contract, which showed the fence on the Ferrara lot but did not include any boundary line bearings or distances.



## Reporting Adverse Possession to Amica, attempt to retain Lawyer and Surveyor

Brown was a first-time homebuyer and was not familiar with adverse possession but realized was on his property when he returned home and learned that the purpose of the fence was to allow Ferrara to steal part of his property. Brown first attempted to file a claim with Amica about the adverse possession in 2003 but was told, "your property does not cover land" (See Documents Group 4) by Amica's Claim Manager John Martin.

From 2004-2009, Brown attempted repeatedly to retain an Attorney, Surveyor and file a claim with Amica but he could not procure legal advice or any assistance from Amica.

Brown contends that the Maine Bar, Maine Surveyors, and Amica were colluding to support the theft of part of his lot by Ferrara by denying Brown legal representation.

## Threats by Laites, Police Harassment

In 2005, after dinner and drinks at a Belfast restaurant, Brown and his Wife were threatened by Gilbert Laite, the brother of Parker Laite Senior, who repeatedly suggested that Parker would "ruin their lives if they did not go along with the adverse possession by Ferrara." In 2006, Brown started getting harassed out of state where he was working and by a person(s) with whom he was working, often forced out of jobs within a few months. Brown's income went from over \$100,000 in 2005 to less than \$25,000 from 2006-present because of the continued interference in his career and business by Ferrara and the Camden Police Department. Brown believes that recently Ferrara and/or the Laites have been paying managers who hire him thousands of dollars to fire him, in order to force Brown into bankruptcy and from his home. In 2018, Brown believes that the interference in his business cost him two contracts that he started would have paid him at least \$100,000 each, at Endologix and Allurion Technologies.

## Orders for Protection against Camden and Rockport Police and Ferrara

In 2008, the Camden and Rockport Police began openly harassing Brown and his Wife, often positioning themselves along routes that they drove and staring them down as he passed or following him closely every time Brown left his home. In 2008, in an attempt to stop the harassment of his Wife Brown filed for Orders of Protection against Ferrara and the Camden and Rockport Police Departments (See Documents Group 5), but the Orders for Protection were denied by the Rockland District Court.



Craig Brown has alleged in Court filings that Ferrara and Police in Camden Maine and Austin Texas used “stingray” devices and other listening devices to monitor communications in his home and intercept his cell phone calls in order to interfere in his career/business. It was legal for Police to use “stingray” device without a warrant until 2014 when the Justice Department announced that “stingray” devices should not be used without a warrant, but prior to 2014 many Police departments were able to use “stingray” devices at will to intercept and track cell phone conversations of anyone they chose to harass.

This allowed the Police to shut down Craig Brown’s career/business and know where he was working and have him harassed at work. In addition to the stingray devices, Craig Brown also alleged that Police and/or Detectives repeatedly broke into his personal cars and planted GPS devices in order to track his movements and harass him at will. This included a 1999 BMW 740 il, 1998 Toyota 4Runner, 1988 Toyota 4 Runner, 1997 Toyota 4 Runner, 1992 Lexus SC 400 Sports Coupe, 1998 Lexus SC 400 Sports Coupe, 1998 GS 400 Lexus Sports Coupe, 2006 Toyota Tacoma, 2001 Toyota Tacoma, and a 1999 Toyota 4Runner since the harassment began.

In response, Craig Brown bought bug detectors and had his vehicles inspected for illegitimate GPS devices (Documents Group 6) but was unable to locate the devices (they are difficult to find because they are small and can be shut off remotely).

## **Police and Ferrara send a prostitute to a health club**

In 2008, Brown went to work for Gentex, a company that makes military helmets in Carbondale, Pennsylvania. Brown joined the Birchwood Health Club in Clarks Summit in order to have a place to exercise. Shortly after Brown joined the Club, a young woman with an Eastern European accent, near 25 years old and extremely attractive (12+ on a scale of 1-10) joined and started visiting the Club whenever Brown was there. If Brown went to the Club right after work she was there, or if he ate dinner first and went in later she was also there. The woman was always smiling at Brown and trying to initiate contact, often by using her charm. This progressed to the woman repeatedly following Brown out of the Club to his vehicle.

Brown could not understand why a 25-year-old beauty would be interested in him given the age difference and the fact that there were many more wealthy and better-looking men in better shape at the health club. After Brown rejected the woman’s advances in the parking lot several times, she finally gave up and was not seen at the Club again. Brown suspects that the woman was a prostitute and was hired to become involved with him in order to break up his marriage

## Malicious Prosecution for Felony Criminal Mischief

Brown endured the harassment of his Wife and himself by the Camden and Rockport Police through 2009, and then used a Stihl chainsaw to remove the Ferrara fence from his property after faxing the Knox County District Attorney a diagram of what sections he believed were on his lot and that he was going to remove in another attempt to stop the harassment.

The Camden Police arrested Brown for Felony Criminal Mischief (SCR-083-2009) based on false Police Reports filed by Ferrara who claimed the fence was on his property even though the damage was less than \$2000 and not great enough to merit a Felony charge. The Camden Police also suppressed *exculpatory evidence* from the Grand Jury which would have proven Brown's innocence including the FE Beal Survey which shows that the boundary lines of the Brown and Ferrara lots had been illegally moved and Auto Cad Models developed by Brown.







Brown retained Defense Attorney Jon Gale who advised Brown to “let Ferrara put the fence back up for a year” and pay him \$8000. When Brown learned that Gale had given him advice which would have forfeited his property rights via *collateral estoppels*, he fired Gale.

At a related Order of Protection hearing, Ferrara’s Attorney Baiungo also tried to defraud Brown by modifying the terms of the Order after Brown had signed it. Brown wrote a letter to the Court protesting but never received a reply ([See Documents Groups 6](#)).

Brown had to defend himself Pro Se against the Felony Criminal Mischief charge because Maine Lawyers colluded and denied him representation, and his income did not allow him to qualify for a Public Defender.

Judge Hjelm allowed the Knox County DA to suppress exculpatory evidence at Brown’s criminal trial per *Brady v. Maryland* including the FE Beal Survey and AutoCAD models Brown had prepared that proved that the lot lines in the Stonehurst Subdivision had been illegally moved which would have exonerated Brown. Ferrara, Camden Zoning Officer Nims, Police Chief Roberts and Surveyors Gusta Ronson (Good Deeds) and Nathaniel Beal all perjured themselves at Brown’s criminal trial and testified that the Ferrara fence was on the Ferrara lot.

The Knox County District Attorney also tried to argue that Brown should spend at least one year in jail despite only the misdemeanor conviction and no previous record.

## Malicious Prosecution of RE-09-10

Ferrara/Baiungo then filed civil suit RE-09-10 alleging property damage and trespassing in another attempt to change the boundary line. Brown retained Attorney Steven Peterson but Peterson would not take any action to defend Brown, so Brown fired him. Ferrara/Baiungo immediately moved for Summary Judgment based on the FE Beal Survey which details the location of the Ferrara residence at 25'+ from the common lot line with Brown's lot.

The motion was granted by Judge Jeffery Hjelm (now on Maine Supreme Court) who did not have jurisdiction to grant an Order changing a Maine Subdivision (per Title 30-A, M.R.S.A 4406 & 4407 and the Camden Subdivision Ordinances which require that all changes to approved Maine Subdivisions be made through the Planning Board Permitting process). Judge Jeffery Hjelm also refused Brown's motions to recuse from hearing SCR-083-2009 and RE-09-10 concurrently and heard both the civil and criminal complaint against Brown.

The FE Beal Survey is an illegitimate survey because it was never approved by the Camden Planning Board and effects a change in the boundary lines in the Stonehurst Subdivision in violation of Title 30-A, M.R.S.A. 4406 & 4407 and the Camden Subdivision Ordinances Article 12. The FE Beal Survey also shows the rear lot lines of the Ferrara and Brown lots on the stone walls that are on the property of the abutting property owner per the Vial to Laite Deed which conveyed the land to Laite, so the FE Beal Survey is in conflict with the Title Analysis of the Stonehurst Subdivision ([See Documents Group 7](#)).

Because of Judge Hjelm's lacked of Jurisdiction to enter the RE-09-10 Judgment which awarded Ferrara a change to the boundary lines of his lot per the FE Beal Survey, the Judgment is considered to be a void Judgment:

*"Judgment is a void judgment if the Court that rendered judgment lacked jurisdiction over the subject, or the parties, or acted in an inconsistent with Due Process," Federal Rules of Civil Procedure, Rule 60 (b)(4), 28 U.S.C.A.; Const. Amend. 5 – Klugh v. U.S.*

*"When rule providing relief from void judgment is applicable, is not a discretionary matter, it is mandatory," Orner v. Shalala, 30 F. 3d. 1307. (Colo./st1:State 1994).*

## Federal Racketeering Constitutional Rights Complaints



In an attempt to stop the malicious prosecution of SCR-083-2009 and RE-09-10, Brown filed a Federal Lawsuit 2:10-CV-00063 GZS in February 2010 which alleged RICO (Racketeering) and Constitutional Rights violations by the Town of Camden. The complaint was immediately dismissed by Magistrate Judge Margaret Kravchuk who cited Brown's wrongful SCR-083-2009 conviction and the RE-09-10 Judgment.

Because both SCR-083-2009 and RE-09-10 claim damages for "property damage," they were both covered under the "Duty to Defend" clause in Brown's Homeowners Insurance Policy. In September of 2010, Brown met with John Martin, Amica's claim manager at Amica's Portland Office to discuss filing another federal Lawsuit to appeal the wrongful SCR-083-2008 conviction and void RE-09-10 Judgment. Martin refused Brown's claim in a September 22, 2010 letter.

Brown filed 2:10-CV-00523 GZS (Judges Kravchuk, Singal, Rich) Pro Se which alleges Fraud, Racketeering and Constitutional Rights violations against the persons involved in the malicious prosecution of SCR-083-2009 and RE-09-10 and eventually filed 2:11-00426 JAD (Judge Di Clerio) against the Maine Attorney General and other State Employees who were also involved.

The Federal litigation was drug out for over three years and Brown was harassed daily by Court Officers, Police and others during litigation and filed (4) Judicial Complaints against Judges and Court Clerks with the First Circuit Court of Appeals, who ignored them. Judge Singal eventually ruled that the lot lines of the Stonehurst subdivision were not changed despite the fact that all of the bearing and distances specified on the FE Beal Survey are different from those on the Stonehurst Subdivision Plan ([See Documents Groups 8](#)).

In short, the Maine Federal Court ignored the Constitutional Rights violations of Brown by the Town of Camden Police and Knox County DA, and would not overturn the illegitimate Judge Hjelm RE-09-10 Judgment or Brown's SCR-083-2009 Misdemeanor Conviction.

## Cross County Hitchhiking

In attempts to evade the emotional stress and pressure of 24 hour Seven day a week electronic surveillance by Police and Ferrara at his home, and to improve his chances of finding a new job, Brown traveled between his mother's home in Austin and Camden repeatedly during the Federal litigation, often hitchhiking in order to evade any Police and/or Private Detectives who repeatedly tried to follow and harass Brown while he was hitchhiking.

Brown believes that Ferrara and/or Laite either hired the person that owns the home immediately behind his mother's house in Austin or rented the house in order to enable them to keep the same 24 hours seven day a week electronic surveillance while Brown was in Austin which has continued to present. Some of Brown's hitchhiking trips took him as far as Iowa, Minnesota, Oregon and Southern California riding with truckers.

In his first hitchhiking trip, Brown forgot to turn his phone off and was harassed and stared down by Austin Police when he left north Austin, harassed and stared down by Police in Dallas, and had Police in Georgia greet him at a truck stop in Georgia after he arrived there with a trucker who had a delivery in Atlanta. The Georgia Police continued to harass and follow him in Georgia and eventually, he ended up at a Rest Stop in Tennessee where someone (private detective) in the Rest Stop tried to remotely access his computer.

Brown believes that Ferrara/Laite have probably spent at least \$100,000-\$400,000 for having him harassed in the past twelve years, not including what the Towns of Camden, Rockport and Austin have funded for Police efforts to use their presence to threaten and intimidate Brown.

## **Appeals to First Circuit Court of Appeals and the United States Supreme Court**

In Appeal 12-1847 to the First Circuit Court of Appeals and Writs of Certiorari to the United States Supreme Court, Brown argued that "any reasonably competent sixth grader who can add and subtract would determine that the boundary lines had been changed," ([See Documents Group 9](#)) but his Appeals were denied.

## **CV-00109-2015 against Amica, First National Title Group, Wells Fargo and PNC**

In March of 2015, Brown filed CV-00109-2015, a Breach of Contract/Unfair Business Practices Complaint against Amica Insurance Company, First National Title Group, Wells Fargo and PNC Banks with Cumberland County Superior Court. The hearing of CV-00109-2015 was a three-year carbon copy of what happened in Federal Court, Brown was jerked around by the Judge and Court Clerks and filed (4) Judicial Complaints against Judge Warren and several motions to recuse, but Warren refused ([See Documents Group 10](#)). The Camden and Rockport Police and Police in Austin also harassed and bullied Brown during litigation, and there were attempts by coworkers at Hospira in Austin and Johnson and Johnson in Georgia to interfere with Brown's ability to prosecute the complaint.



Brown contends that this harassment during litigation constitutes "Fraud upon the Court," or as the U.S. Supreme Court stated in *Bullock v. United States*, 763 F.2d 1115, 1121 (10<sup>th</sup> Cir. 1985): "Fraud upon the Court is fraud which directed at the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury, it is where the court or a member is corrupted or influenced or influence is attempted or where the Judge has not performed his judicial function – thus where the impartial functions of the Court have been corrupted."

Brown filed (3) Death Knell Appeal motions with the Maine Supreme Court during the litigation of CV-00109-2015 because the constant harassment by Police and others and his denial of adequate medical care during litigation affected his ability to prosecute his Complaint and adversely affected his health.

The Death Knell Appeal allows the Maine Supreme Court to hear a case before it has gone to trial if the facts would allow for a decision and if there are mitigating circumstances such as extended litigation or anything else that would prevent the Plaintiff from getting a fair trial. Justice Ellen Gorman, who Brown contends was acting to protect corruption in Knox County, refused to recuse from hearing the motions and denied all three.

In his third Death Knell Appeal filing, Brown accurately predicted that the harassment during litigation would cause a heart attack or stroke, and Brown had an AFIB stress-related stroke a few weeks after the CV-00109-2015 trial.

While Craig Brown appealing CV-00109-2015 to the Maine and United States Supreme Courts, doctors in New England including those at the Maine Medical Center, Mercy Hospital, Massachusetts General Hospital, Searsport Health Center and Augusta Health Center would not take him off Metoprolol, which caused his weight to balloon to 352 lbs. from water retention.

In November of 2017, Brown sought medical care in Mexico and was put on strong diuretics, which enabled him to lose 112 lbs. between November 9, 2017, and December 15, 2017. The Maine Supreme Court denied Brown's CV-00109-2015 Appeal and the United States Supreme Court would not hear the case ([See Documents Groups 11](#)).

## Continued Harassment (My Opinion)

The interstate harassment has continued and Brown is now trying to find justice in the Court of Public Opinion via the Internet to stop the harassment and is hoping to warn

others of the dangers of buying property in Maine, given (in my opinion) the blatant corruption in the Maine “legal system,” and the collusion by Maine Attorney’s to collectively deny legal representation.

Brown quit making house payments to Wells Fargo and PNC Banks while he was trying to get the illegitimate RE-09-10 Judge Hjelm Judgment overturned, and is now trying to fight actions by Wells Fargo to foreclose on his home given that with the illegitimate RE-09-10 Judgment in place, Ferrara’s fence may affect a permanent change in the boundary lines of Brown’s lot, and thus make his home unmarketable per Title 30-A, M.R.S.A. 4406 which prohibits selling lots in a subdivision which don’t agree with the subdivision Plan on file with the local registry.

Brown’s argument against foreclosure is supported by the fact that he filed a claim with First National Title Insurance Group in 2014 regarding the Adverse Possession and Hjelm Judgment, and the Company has only recently responded with a lame excuse for not prosecuting a lawsuit to recover Brown’s property rights which he believes is required by his Title Insurance Policy.

## You Can Help

Brown is asking persons who have reviewed the supporting documents and believe his opinions and pleadings regarding his malicious prosecution and corruption to either write letters and/or express outrage to Amica Insurance Company and Public Officials listed and/or buy a T-Shirt to help financially support and broadcast his cause to help protect others from the corrupt Maine real estate market and “legal system.”

If you would like further information, or to forward comments to Craig Brown, please use the button below to access the “Fighting Camden, Amica and Ferrara for the Boundary Line” Blog and contact Brown directly.

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