



The Council for Education
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VIA ELECTRONIC SUBMISSION

April 22, 2022 Ann E. Misback, Secretary,
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

**THE COUNCIL FOR EDUCATION'S (CED'S) COMMENTS REGARDING
GUIDELINES FOR EVALUATING ACCOUNT AND SERVICES REQUESTS OF A
NOVEL STABLECOIN BANK'S CHARTER; Docket No. OP-1765**

Dear Ms. Misback,

The Council for Education (CED) is a public-interest law firm that represents federal student loan borrowers as a designate¹ in matters related to their federally held student loans before the Federal Student Aid (FSA), U.S. Department of Education. Further, it operates as a third-party servicer by auditing² Higher Education Institutions (HEI). The CED is registered with the Nevada Secretary of State and operates as a self-regulatory organization (Nevada business ID# NV20171702562) and tax-exempt nonprofit organization (EIN: 82-3295336). The CED audits and litigates on behalf of member subscribers. The CED's subsidiary, Stablecoin Bank, is developing an automated information-collection platform called the Student Loan Integrity Platform (™). The audit platform is a data-driven immutable distributive ledger that swaps derivatives on student loan debt.

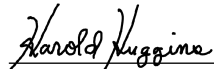
We ask for the Board of Governors of the Federal Reserve System to issue supplemental notices and public comments under its proposed guidelines (Account Access Guidelines) regarding the accuracy ratio of the organization's Stablecoin Bank transactions on federal student loans.

In conclusion, the CED welcomes future public notices in support of defining guidelines regarding a Novel Stablecoin Bank's Charter.

¹See Attachment "A."

² See "Falsification of accounting records is responsible for the current student loan crisis [3] and further looting of the United States Department of Treasury of tens of trillions of US dollars in debt owed by the Federal Reserve Bank to international banks," CED v. IRS, 9th Cir. R. 42-1, lead case no. 14-70825 (2014); member case no. 1456113 (Feb. 15, 2022, docket no. 23, p. 3).

Yours sincerely



Harold Huggins

Director, Council for Education

cc: Ilyas Anis, Treasurer, Lead Auditor for the CED

Aasma Yaseen, Chief Operating Officer for the CED

Chairwoman of the International Committee of Fiat Currency

The accounting firm of Marcum, LLC

The forensic accounting firm of Danny F Dukes and Associates, LLC

Sir Jon Cunliffe, Deputy Governor of the Bank of England, CPMI Chair
Bank for International Settlements
CH-4002 Basel Switzerland

Jerome H. Powell, Board of Governors, FOMC Chair
The Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Elizabeth "Lisa" Brown
General Counsel
US Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Erica Y. Williams, Esq., Chair, Public Company Accounting Oversight Board

Michelle Parham, Director for Consumer Complaint Operations Comptroller of the
Currency

General Secretariat, International Organization of Securities Commissions

CPMI Secretariat, Bank for International Settlements

David Xu, CFA, Sr. Manager, Credit Risk Management

Federal Reserve Bank of San Francisco

U.S. Senator Catherine Cortez Masto of Nevada

U.S. Representative Dina Titus of Nevada

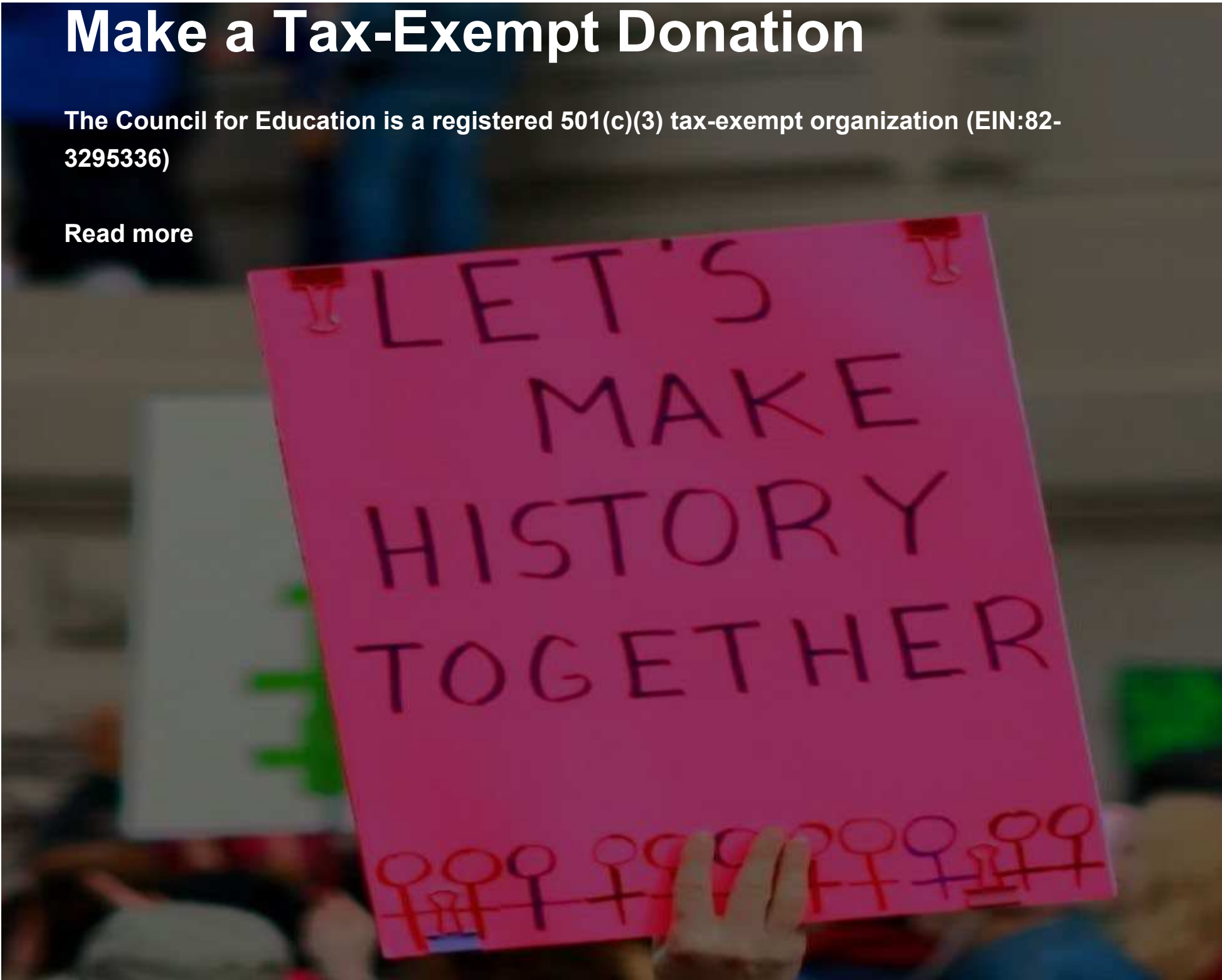
Molly C. Dwyer, Clerk of Court, RE: Appeals Docket Nos. 14-70825 & 14-56113,
United States Courts for the Ninth Circuit

ATTACHMENT “A”

Make a Tax-Exempt Donation

The Council for Education is a registered 501(c)(3) tax-exempt organization (EIN:82-3295336)

[Read more](#)



1. DONATION

DONATION AMOUNT *

\$35

\$100

\$250

\$500

\$1200

OTHER AMOUNT

1. DONATION

FIRST NAME *

first name

LAST NAME *

last name

STREET ADDRESS *

Street Address

CITY *

City

STATE *

State

ZIP CODE *

Zip Code

COUNTRY *

United States

EMAIL *

Email

MOBILE

(xxx) xxx- xxxx

3. PAYMENT

CREDIT CARD NUMBER *

MM/YY CVC *

1.

As a member subscriber, you'll receive email updates from the Council for Education. You can unsubscribe anytime.
2.

By donating, you designate the Council for Education to represent you, a federal student loan borrower, in matters related to your federally held student loans. You have the right to revoke this designation anytime.
- ☐

I will cover the 2.9% + 30¢ fee for a successful card charge so 100% of my donation goes for federal student loan equity.

DONATE \$100

The Council for Education is a public-interest organization advocating for federal student loan borrowers. We believe that no student should be burdened with excessive student loan debt.



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