

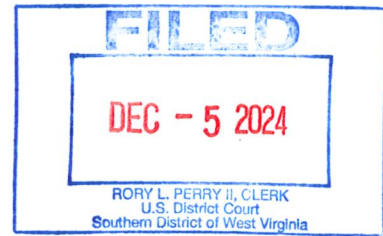
IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

Anna White Ferraraccio,
Plaintiff,

v.

New Peoples Bank,
Defendant.



5:24-CV-00700

Civil Action No.: [To be assigned]

COMPLAINT

I. INTRODUCTION

Plaintiff, **Anna White Ferraraccio**, a resident and business owner in Summers County, West Virginia, brings this action pro se against Defendant, **New Peoples Bank**, for engaging in discriminatory lending practices, defamatory conduct, retaliation, and **election interference**. Despite publicly touting itself as a bank founded on Christian principles, including “the Golden Rule” of treating others as they wish to be treated, Defendant has demonstrated an adversarial and discriminatory approach to dealing with its customers and employees.

Defendant’s actions against Plaintiff, including the deliberate mishandling of her loan application, retaliation, defamation, and interference with her candidacy for public office, form part of a systemic pattern of unlawful behavior. Defendant has also been the subject of multiple lawsuits alleging similar conduct, further illustrating an entrenched culture of hostility and bias that undermines the very principles it claims to uphold.

Plaintiff seeks monetary damages, declaratory relief, injunctive relief, and punitive damages to hold Defendant accountable and to deter future misconduct.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 1331, as this action arises under:

- **The Equal Credit Opportunity Act** (15 U.S.C. §§ 1691-1691f);
- **The Truth in Lending Act** (15 U.S.C. §§ 1601-1667f);
- **42 U.S.C. § 1983**, for violations of Plaintiff’s rights under the Equal Protection Clause of the Fourteenth Amendment;

- **18 U.S.C. § 245(b)(1)**, for interference with Plaintiff's right to run for public office, protected under federal election interference statutes.

Venue is proper in the Southern District of West Virginia under 28 U.S.C. § 1391(b) because the events giving rise to this action occurred in Summers County, West Virginia, and Defendant conducts significant business operations, including maintaining a branch in Princeton, West Virginia, within this District. The federal courthouse for this District is located at:

Robert C. Byrd United States Courthouse
110 North Heber Street, Room 336
Beckley, WV 25801

III. PARTIES

1. **Plaintiff:** Anna White Ferraraccio is a resident of Pipestem in Summers County, West Virginia. Plaintiff owns and operates Pipestem Spa and Event Center, a business that relies on financing from Defendant.
2. **Defendant:** New Peoples Bank is a financial institution with principal offices located in [Insert Location]. Defendant conducts significant business operations in Summers County and Mercer County, including through its branch located in Princeton, West Virginia.

Defendant promotes itself as being founded on Christian principles, including “the Golden Rule.” However, its adversarial treatment of customers and employees starkly contrasts these values, as evidenced by Plaintiff’s experiences and prior lawsuits filed against Defendant alleging discrimination, retaliation, and unlawful conduct.

IV. FACTUAL ALLEGATIONS

1. **Candidacy Announcement and Repercussions:**
 - In February 2024, Plaintiff announced her candidacy for the West Virginia House of Delegates as a Democratic candidate, publicly declaring her intent to serve the residents of Summers County.
 - Following her announcement, Defendant engaged in a sustained and deliberate campaign of discrimination, retaliation, and interference, including but not limited to:
2. **a. Loan Approval Misrepresentation and Deliberate Mishandling of Loan**
 - Defendant’s loan officer, Jamie Kidd, assured Plaintiff that her loan application had been approved.
 - Defendant subsequently delayed processing and mismanaged the loan under false pretenses, resulting in significant financial harm, including bounced checks

to contractors and employees, undermining Plaintiff's business and political campaign.

3. b. Defamation

- Defendant's attorney, William Winfrey, maliciously issued false and defamatory statements accusing Plaintiff of disruptive behavior.
- These statements were communicated to third parties, damaging Plaintiff's reputation in the Summers County community and harming her credibility as a political candidate.

4. c. Pattern of Discrimination Against Women and Non-MAGA Evangelicals

- Defendant's workplace culture is hostile toward women and individuals who do not align with MAGA evangelical political or religious views.
- Plaintiff's treatment is consistent with this documented pattern of bias.

5. d. Retaliation

- After Plaintiff raised legitimate grievances about Defendant's actions, Defendant escalated its retaliatory behavior by threatening foreclosure on her business and initiating baseless legal actions designed to intimidate and silence her.

6. Election Interference:

- Defendant's discriminatory practices and retaliatory conduct obstructed Plaintiff's ability to effectively campaign.
- Financial instability caused by loan delays, combined with defamatory statements, detracted from Plaintiff's electoral efforts, violating federal protections against election interference.

7. Documented History of Misconduct:

- Defendant's systemic discriminatory and retaliatory practices are further evidenced by prior lawsuits filed against Defendant, alleging:
 - Discrimination against female employees and customers;
 - Retaliation against whistleblowers and individuals raising concerns about unlawful practices;
 - Hostility toward individuals with political or religious beliefs differing from those of Defendant's leadership.

8. Operations in Princeton, West Virginia:

- Defendant conducts significant business operations in Princeton, West Virginia, within Mercer County, where similar allegations of misconduct have been reported by employees and customers.

V. LEGAL CLAIMS

Count I: Violation of the Equal Credit Opportunity Act (15 U.S.C. §§ 1691-1691f)

- Defendant discriminated against Plaintiff in the extension of credit on the basis of gender and political affiliation, violating the Equal Credit Opportunity Act.
- Defendant's deliberate mishandling of Plaintiff's loan application caused financial harm to Plaintiff and her business.

Count II: Violation of the Truth in Lending Act (15 U.S.C. §§ 1601-1667f)

- Defendant failed to provide clear, truthful, and timely disclosures regarding the status of Plaintiff's loan application.
- Defendant's deliberate mishandling of the loan application directly caused Plaintiff financial harm.

Count III: Defamation

- Defendant, through its attorney, made false and defamatory statements about Plaintiff with malice, damaging her reputation in Summers County, Mercer County, and beyond.
- These statements harmed Plaintiff's business, standing in the community, and political aspirations.

Count IV: Retaliation

- Defendant retaliated against Plaintiff for exercising her legal rights, including raising concerns about discriminatory practices.
- Retaliatory threats of foreclosure and baseless legal actions inflicted financial and emotional harm upon Plaintiff.

Count V: Election Interference (18 U.S.C. § 245(b)(1))

- Defendant's conduct deliberately obstructed Plaintiff's participation in the democratic process by creating financial instability and defaming her reputation as a candidate.
- These actions constitute unlawful election interference under federal law.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests this Court to:

1. Award compensatory damages for financial losses, emotional distress, and reputational harm.
 2. Award punitive damages to deter Defendant from continuing discriminatory and retaliatory practices.
 3. Issue an injunction requiring Defendant to implement anti-discrimination policies and comply with federal and constitutional protections.
 4. Declare Defendant's actions unlawful under federal law and constitutional principles.
 5. Award Plaintiff attorneys' fees and court costs.
 6. Grant such other relief as this Court deems just and proper.
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VII. NOTARY ACKNOWLEDGMENT

**STATE OF WEST VIRGINIA
COUNTY OF MERCER**

On this **5th day of December, 2024**, before me, the undersigned Notary Public, personally appeared **Anna White Ferraraccio**, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing Complaint, and acknowledged that she executed the same for the purposes therein contained.

Notary Public Signature: _____

Printed Name: _____

My Commission Expires: _____

Notary Seal:

Respectfully submitted,

Anna White Ferraraccio

Plaintiff, Pro Se

41 Pipestem Spa Way

Pipestem, WV 25979

Phone: (304) 894-4830

Email: AnnaFerraraccio@gmail.com

DATED: December 5, 2024

Anna White Ferraraccio

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

Anna White Ferraraccio,
Plaintiff,

v.

New Peoples Bank,
Defendant.

Civil Action No.: [To be assigned]

SUMMONS IN A CIVIL ACTION

TO: New Peoples Bank

Address: 67 Commerce Drive, Honaker, Virginia 24260

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Anna White Ferraraccio

41 Pipestem Spa Way

Pipestem, WV 25979

Phone: (304) 894-4830

Email: AnnaFerraraccio@gmail.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk of Court

Date: _____

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS:

Anna White Ferraraccio

(b) County of Residence of First Listed Plaintiff: Summers County, WV

(c) Attorneys (If Known): Pro Se

DEFENDANTS:

New Peoples Bank

(b) County of Residence of First Listed Defendant: [To be filled by Clerk]

II. BASIS OF JURISDICTION (Place an 'X' in One Box Only)

☒ 1. U.S. Government Plaintiff

☐ 2. U.S. Government Defendant

☐ 3. Federal Question (U.S. Government Not a Party)

☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (For Diversity Cases Only)

Plaintiff: ☐ Citizen of This State

Defendant: ☐ Citizen of Another State

IV. NATURE OF SUIT (Place an 'X' in One Box Only)

☒ 890 Other Statutory Actions

V. ORIGIN (Place an 'X' in One Box Only)

[X] 1. Original Proceeding

VI. CAUSE OF ACTION

Brief Description: Discriminatory lending practices, defamation, retaliation, and election interference under federal statutes including 15 U.S.C. §§ 1691-1691f, 15 U.S.C. §§ 1601-1667f, and 42 U.S.C. § 1983.

VII. REQUESTED IN COMPLAINT

Demand: Monetary and Injunctive Relief

Jury Demand: [] Yes [X] No

VIII. RELATED CASE(S) IF ANY

Judge: [None]

Case Number: [None]