

EXHIBIT DD

Debt-to-Income Analysis – Mortgage Assumption Feasibility for Alyson Bell

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1. INTRODUCTION

This exhibit provides a debt-to-income (DTI) feasibility analysis using standard lending formulas and publicly accepted underwriting guidelines. It evaluates whether Alyson Bell could have qualified to assume the existing mortgage under a 2.75% interest rate and to cover associated liabilities, including equalization payments and consumer debts.

The purpose is to establish that her income at the time of trial was insufficient to support the financial structure proposed, thereby contradicting representations made to the Court and expert witness assumptions (See Exhibit JJ, Exhibit CC).

2. CROSS-REFERENCE TO TIMELINE & STRATEGIC SHIFT

This debt-to-income analysis should be read in conjunction with Exhibit HHAA (Glassman Timeline) and Exhibit EMKG, which confirms that on July 12, 2023, Carol Glassman and her team were notified that the 2.75% mortgage loan was assumable. This development may have appeared to make the financial structure of the settlement more attainable — but in reality, as shown here, Alyson Bell's documented income and liabilities still rendered qualification impossible under standard lending practices.

The sudden shift in litigation tone — including the suppression of Plaintiff's July 14th counteroffer (Exhibit MMB), and the strategic filing of a new expert rebuttal on July 17 (Exhibit JJA) — appears designed to capitalize on the assumability revelation, while concealing the fact that the math still didn't work.

This analysis underscores the deceptive narrative presented to the Court and supports allegations outlined in Exhibit DD of financial distortion contributing to Fraud Upon the Court under C.R.C.P. 60(b).

3. MORTGAGE OVERVIEW

Metric	Value
Loan Amount	\$519,893
Property Value	\$990,000
Interest Rate	2.75%
Loan Term	30 years
Monthly Mortgage Payment (PITI)*	\$3,084.56

*PITI includes principal, interest, taxes, and insurance. Calculated using standard amortization formula.

4. ALYSON BELL'S DOCUMENTED MONTHLY INCOME

Income Source	Monthly Amount
Primary Job	\$4,166.67
Part-Time Job	\$1,440.00
Total Gross Monthly Income	\$5,606.67

5. EXISTING DEBTS ASSIGNED TO ALYSON

Creditor	Balance	Estimated Monthly Payment
United Airlines Mileage Plus	\$1,375.92	\$27.52
Citi Diamond Preferred	\$5,830.00	\$116.60
Sleep Number / Synchrony	\$4,838.40	\$96.77
Total Debts	\$12,044.32	\$240.89

6. EQUALIZATION PAYMENT & HELOC IMPACT

To fulfill the Court-ordered equalization payment of \$82,592, a Home Equity Line of Credit (HELOC) would likely be necessary.

- Assumed HELOC Terms: 20 years @ 7%
- Monthly HELOC Payment: \$648.40

7. TOTAL MONTHLY DEBT OBLIGATIONS

Obligation	Monthly Amount
Mortgage Payment (PITI)	\$3,084.56
Existing Consumer Debts	\$240.89
HELOC Payment (Equalization)	\$648.40
Total Monthly Obligations	\$3,973.85

8. DEBT-TO-INCOME (DTI) RATIO ANALYSIS

Lender Benchmark: To qualify, back-end DTI must not exceed 43% of gross income (standard per Fannie Mae, FHA, Wells Fargo).

Required Gross Monthly Income = $\$3,973.85 \div 0.43$
= \$9,243.72 per month

7. INCOME GAP ANALYSIS

Description	Amount
Alyson's Gross Monthly Income	\$5,606.67
Required Monthly Income	\$9,243.72
Income Shortfall	\$3,637.05/month
Annualized Shortfall	\$43,644.60/year

CONCLUSION

Based on this debt-to-income analysis, Alyson Bell would have needed to increase her gross monthly income by at least \$3,637.05, or more than \$43,600 per year, to qualify for the assumable loan and associated obligations. At the time of trial, her income and liabilities rendered qualification infeasible under standard underwriting criteria.

These figures call into question the plausibility of representations made to the Court and to opposing counsel regarding loan assumption capability. They also challenge the reliability of expert assumptions used in post-trial enforcement actions and permanent orders.

DISCLAIMER

This analysis is based on verified financial information at the time of trial as reflected in the permanent orders and related filings. While lender-specific policies may vary, the methodology used reflects industry-standard calculations and publicly available benchmarks.

Sources:

- Wells Fargo: DTI Guidelines
- NerdWallet: Credit Card Payment Formulas
- Investopedia: Debt-to-Income Ratios
- Exhibit CC (Permanent Orders)
- Exhibit JJ (Freedberg Report)