

**U.S. DEPARTMENT OF HOUSING & URBAN DEVELOPMENT  
OFFICE OF FAIR HOUSING & EQUAL OPPORTUNITY**

---

NATIONAL FAIR HOUSING ALLIANCE, )  
HOUSING OPPORTUNITIES PROJECT FOR )  
EXCELLENCE, INC., METRO FAIR HOUSING )  
SERVICES, INC., MIAMI VALLEY FAIR )  
HOUSING CENTER, CENTRAL OHIO FAIR )  
HOUSING ASSOCIATION, NORTH TEXAS )  
FAIR HOUSING CENTER, FAIR HOUSING )  
CENTER OF WEST MICHIGAN, FAIR )  
HOUSING CONTINUUM, INC., SOUTH )  
SUBURBAN HOUSING CENTER, HOPE FAIR )  
HOUSING CENTER, METROPOLITAN )  
MILWAUKEE FAIR HOUSING COUNCIL, )  
FAIR HOUSING CENTER OF CENTRAL )  
INDIANA, DENVER METRO FAIR HOUSING )  
CENTER, TOLEDO FAIR )  
HOUSING CENTER, OPEN COMMUNITIES, )  
GREATER NEW ORLEANS FAIR HOUSING )  
ACTION CENTER, FAIR HOUSING OF )  
MARIN, )  
and HOUSING RESEARCH & ADVOCACY )  
CENTER; )  
)  
Complainants, )  
)  
v. )  
)  
BANK OF AMERICA CORP., BANK OF )  
AMERICA N.A., and BAC HOME LOAN )  
SERVICING LP, )  
)  
Respondents. )

---

HUD Inquiry No.: 349540

HUD File No.: 04-13-0016-8

**SIXTH AMENDED FAIR HOUSING COMPLAINT**

Pursuant to 42 U.S.C. §§ 3604 and 3610, the National Fair Housing Alliance (“NFHA”) and 16 of NFHA’s Operating Members (collectively, “Complainants”)<sup>1</sup> lodge the following

---

<sup>1</sup> Housing Opportunities Project for Excellence, Inc. (“HOPE, Inc.”), Metro Fair Housing Services, Inc., Miami Valley Fair Housing Center, Central Ohio Fair Housing Association, North Texas Fair Housing Center, Fair Housing Center of West Michigan, Fair Housing Continuum, Inc., South Suburban Housing Center, HOPE Fair Housing Center, Metropolitan Milwaukee Fair Housing Council, Fair Housing Center of Central Indiana, Denver Metro Fair Housing Center, Toledo Fair Housing Center, Open Communities,

Sixth Amended Complaint alleging that Bank of America Corporation, Bank of America, N.A., and BAC Home Loan Servicing, LP (collectively “Bank of America”) have violated and continue to violate the Fair Housing Act (“FHA”) by maintaining and marketing Real Estate Owned (“REO”) properties in a state of disrepair in predominantly African-American, Latino, and other non-White neighborhoods (hereinafter “neighborhoods of color”) while maintaining and marketing such properties in predominantly White neighborhoods in a materially better condition.

Through the acts and omissions described herein, and those to be discovered during the course of HUD’s investigation, Complainants allege that Bank of America has a systemic and particularized practice of engaging in differential treatment in maintaining and/or marketing its REO properties on the basis of race, color and/or national origin. This practice has occurred at least since 2011 and continues to persist on a national basis and/or in any of 30 metropolitan areas NFHA and its Operating Members investigated in 2011, 2012, 2013, 2014, 2015, and 2016 and described in this Complaint.<sup>2</sup>

## **FACTUAL BACKGROUND**

### **A. The Parties**

Complainant NFHA is the only national non-profit organization dedicated solely to ending discrimination in housing. Founded in 1988, NFHA works to eliminate housing discrimination and to ensure equal housing opportunity for all people through leadership, education and outreach, membership services, public policy initiatives, advocacy and enforcement. NFHA is a consortium of more than 220 private, non-profit housing organizations, state and local civil rights agencies, and individuals throughout the United States. Complainants HOPE, Inc., Metro Fair Housing Services, Inc., Miami Valley Fair Housing Center, Central Ohio Fair Housing Association, North Texas Fair Housing Center, Fair Housing Center of West Michigan, Fair Housing Continuum, Inc., South Suburban Housing Center, HOPE Fair Housing Center, Metropolitan Milwaukee Fair Housing Council, Fair Housing Center of Central Indiana, Denver Metro Fair Housing Center, Toledo Fair Housing Center, Open Communities, Greater New Orleans Fair Housing Action Center, Fair Housing of Marin, and Housing Research & Advocacy Center are non-profit organizations that have similar organizational missions and goals and conduct similar activities as NFHA.<sup>3</sup>

---

Greater New Orleans Fair Housing Action Center, Fair Housing of Marin, and Housing Research & Advocacy Center.

<sup>2</sup> The 30 metropolitan areas: (1) Oakland, Richmond, and Concord, CA; (2) Grand Rapids, MI; (3) Atlanta, GA; (4) Dayton, OH; (5) Miami, FL; (6) Dallas, TX; (7) Phoenix, AZ; (8) Washington, DC; (9) Orlando, FL; (10) Charleston, SC; (11) Chicago, IL; (12) Milwaukee, WI; (13) Indianapolis, IN; (14) Denver, CO; (15) Memphis, TN; (16) Las Vegas, NV; (17) Tucson, AZ; (18) Philadelphia, PA; (19) Toledo, OH; (20) Baltimore, MD; (21) Kansas City, MO; (22) New Orleans, LA; (23) Vallejo, CA; (24) Cleveland, OH; (25) Columbus, OH; (26) Suburban Detroit, MI; (27) Gary, IN; (28) Minneapolis, MN; (29) Newark, NJ; and (30) Tampa, FL.

<sup>3</sup> HOPE, Inc. works in Miami-Dade and Broward Counties, Florida. Metro Fair Housing Services, Inc. is based in Atlanta, Georgia. Miami Valley Fair Housing Center is based in Dayton, Ohio. Central Ohio

Respondent Bank of America Corporation is a publicly-traded financial holding company that provides a range of financial services and products in the United States and abroad. Bank of America Corp., one of the world's largest financial institutions, is a Delaware corporation with its principal place of business in Charlotte, North Carolina. Bank of America Corp. conducts its banking activities through Bank of America, N.A., a wholly-owned subsidiary. BAC Home Loan Servicing LP, which was previously a wholly-owned subsidiary of Bank of America, N.A., was merged with and into Bank of America, N.A. in July 2011.<sup>4</sup>

**B. Bank of America's Role in Maintaining and Marketing REO Properties**

A property becomes an REO property when a bank or lender has foreclosed upon or repossessed a home from a homeowner or borrower and the ownership of the property has reverted to the bank or lender. After a foreclosure occurs, the foreclosing entity that owns the REO property has the responsibility to maintain the property and sell it to a potential owner-occupant or investor. In addition, the owner of a REO property may contract with another entity to service or maintain the REO property. Bank of America has several roles in which it is responsible for preserving, maintaining, marketing, and selling REO properties, including as (1) an owner of REO properties, (2) a servicer of REO properties owned by other entities, and (3) a trustee that manages REO properties on behalf of trust-owners of the properties.

Bank of America utilizes employees and agents to preserve, maintain, market, and sell REO properties throughout the United States. Bank of America has a vast network of brokers/agents who list REO properties on behalf of Bank of America and help to maintain and market those properties. Bank of America also contracts with asset management companies that perform preservation and maintenance work on REO properties on its behalf. *See* Bank of America, *REO broker/agent network application process*, <https://agentresources.bankofamerica.com/reo/broker> (last visited Sept. 18, 2012). Bank of America's primary field service vendor is Safeguard Properties. *See* Jacob Gaffney, *Safeguard buys Bank of America's field servicing operations*, *Housing Wire* (Aug. 2, 2012), <http://www.housingwire.com/news/safeguard-buys-bank-americas-field-servicing-operations>.

**C. Complainants' Methodology for Evaluating Bank of America's REOs**

---

Fair Housing Association is based in Columbus, Ohio. North Texas Fair Housing Center is based in Dallas, Texas. The Fair Housing Center of West Michigan is based in Grand Rapids, Michigan. Fair Housing Continuum, Inc. is based in Orlando, Florida. South Suburban Housing Center is based in Homewood, IL. HOPE Fair Housing Center is based in Wheaton, IL. Fair Housing Center of Central Indiana is based in Indianapolis. Denver Metro Fair Housing Center is based in Denver, CO. Toledo Fair Housing Center is based in Toledo, OH. Open Communities is based in Winnetka, IL. Greater New Orleans Fair Housing Action Center is based in New Orleans, LA. Fair Housing of Marin serves Marin, Sonoma, and Solano Counties in California. Housing Research & Advocacy Center works in northeast Ohio.

<sup>4</sup> Each reference to Bank of America in this Complaint refers collectively to Bank of America Corp., Bank of America, N.A, BAC Home Loan Servicing, and any other subsidiary or division of these entities that plays a role in owning, preserving, maintaining or selling REO properties.

Beginning in 2009 and continuing through the present, NFHA and a number of its member organizations have investigated how Bank of America maintains and markets its REO properties nationwide. In 2011, 2012, 2013, 2014, 2015, and 2016 Complainants evaluated hundreds of single-family and townhome REO properties owned, serviced, and/or managed by Bank of America in the following 30 metropolitan areas: (1) Oakland, Richmond, and Concord, CA; (2) Grand Rapids, MI; (3) Atlanta, GA; (4) Dayton, OH; (5) Miami, FL; (6) Dallas, TX; (7) Phoenix, AZ; (8) Washington, DC / Prince George’s County, MD metropolitan area; (9) Orlando, FL; (10) Charleston, SC; (11) Chicago, IL; (12) Milwaukee, WI; (13) Indianapolis, IN; (14) Denver, CO; (15) Memphis, TN; (16) Las Vegas, NV; (17) Tucson, AZ; (18) Philadelphia, PA; (19) Toledo, OH; (20) Baltimore, MD; (21) Kansas City, MO; (22) New Orleans, LA; (23) Vallejo, CA; (24) Cleveland, OH; (25) Columbus, OH; (26) Suburban Detroit, MI; (27) Gary, IN; (28) Minneapolis, MN; (29) Newark, NJ; and (30) Tampa, FL. Overall, Complainants evaluated 1,267 Bank of America REO properties in these 30 metropolitan areas. As described below, this investigation revealed significant racial disparities in Bank of America’s maintenance and marketing of REO properties throughout the nation.

In conducting these investigations of Bank of America’s REO properties, Complainants employed a methodology that it developed for evaluating how REO properties are maintained and marketed and measuring whether there are differences between how REO properties are maintained and marketed in neighborhoods of color compared to REO properties in predominantly White neighborhoods. Under this methodology, Complainants evaluated over three dozen objective factors in seven different categories – curb appeal, structure, signage and occupancy, paint and siding, gutters, water damage, and utilities – that allow Complainants to document the type, number and severity of the maintenance and marketing problems or deficiencies at each property. The following chart identifies the seven categories and over three dozen objective factors in those seven categories.

<b>Category 1: Curb Appeal</b>	<b>Category 2: Structure</b>	<b>Category 3: Signage &amp; Occupancy</b>
Trash	Unsecured or Broken Doors	Trespassing or Warning Signs
Mail Accumulated	Damaged Steps and Handrails	Marketed as Distressed Property
Overgrown Grass or Accumulated Leaves	Broken or Boarded Windows	“For Sale” Sign Missing
Overgrown or Dead Shrubbery	Damaged Roof	Broken and Discarded Signage
10% to 50% of the Property Covered With Dead Grass	Damaged Fence	Unauthorized Occupancy
Over 50% of the Property Covered With Dead Grass	Holes	Miscellaneous
10% to 50% of Property Covered In Invasive Plants	Wood Rot	
Over 50% of Property Covered In Invasive Plants	Miscellaneous	
Broken Mailbox		
Miscellaneous		

<b>Category 4: Painting &amp; Siding</b>	<b>Category 5: Gutters</b>	<b>Category 6: Water Damage</b>	<b>Category 7: Utilities</b>
Graffiti	Missing/Out of Place	Water Damage	Exposed or Tampered with
Peeling/Chipped Paint	Broken/Hanging	Mold - Small Amount	
Damaged Siding	Obstructed	Mold - Pervasive	
Missing Shutters (not attached/secure)	Miscellaneous	Miscellaneous	
Miscellaneous			

In each metropolitan area where Complainants evaluated Bank of America’s REO properties, they identified certain zip codes that have neighborhoods made up of predominantly African-American residents, Latino residents, Non-White residents, and/or White residents, have foreclosure rates that are high for those metropolitan areas, and are composed of moderate, middle-income neighborhoods.<sup>5</sup> Next, Complainants identified all of Bank of America’s REO properties in the relevant zip codes, and they evaluated all of the Bank of America REO properties (unless they were already occupied or under renovation at the time of the site visit).

**D. Investigation Reveals Stark Racial Disparities in How Bank of America Maintains and Markets REO Properties in Neighborhoods of Color Compared to Predominantly White Neighborhoods**

Throughout its investigation of Bank of America’s REO properties in 2011, 2012, 2013, 2014, 2015, and 2016 Complainants observed stark racial disparities in Bank of America’s maintenance and marketing of REO properties between neighborhoods of color and predominantly White neighborhoods. In the 30 metropolitan areas where Complainants evaluated a number of Bank of America’s REO properties, the data and pictures collected in this investigation demonstrate that Bank of America has engaged in a systemic and particularized practice of maintaining and marketing its REO properties in a state of disrepair in neighborhoods of color while maintaining and marketing REO properties in predominantly White neighborhoods in a materially better condition.

In each of the metropolitan areas where Complainants evaluated a number of Bank of America REOs in neighborhoods of color and White neighborhoods, the properties in White neighborhoods were far more likely to have a small number of maintenance deficiencies or problems than REO properties in neighborhoods of color, while REO properties in

---

<sup>5</sup> To determine the racial or ethnic composition of the neighborhoods in which Bank of America’s REO properties were located, Complainants relied upon 2010 U.S. Census Bureau Block Group Data (or Block Data where available). Neighborhoods were defined as “White” if the surrounding block group (or block where available) was over 50% White, “African-American” if the surrounding block group was over 50% African-American, “Latino” if the block group (or block where available) contained over 50% Hispanic residents, and “Majority Non-White” if the White population of the surrounding block group (or block where available) was less than 50% and no other single racial or ethnic group comprised over 50% of the population alone. Hereinafter, where Complainants refer to “neighborhoods of color,” they collectively refer to all REO properties in African-American, Latino and Majority Non-White neighborhoods.

neighborhoods of color were far more likely to have large numbers of such deficiencies or problems than those in White neighborhoods. In addition, in these metropolitan areas, Complainants observed significant racial disparities in many of the objective factors evaluated. Accordingly, in these metropolitan areas, Complainants observed a systemic and particularized practice of engaging in differential treatment in maintaining and/or marketing REO properties on the basis of race, color and/or national origin.

In four metropolitan areas—Washington, DC, Phoenix, AZ, Tucson, AZ, and Newark, NJ—there were fewer Bank of America REO properties in predominantly White areas to evaluate than in other metropolitan areas when Complainants undertook their investigation of Bank of America REO properties in neighborhoods of color. A major reason why there were significantly fewer Bank of America REO properties available to evaluate in predominantly White neighborhoods in these four metropolitan areas than in other metropolitan areas is that Bank of America does a far superior job maintaining and marketing REO properties in White neighborhoods, which means those properties are sold much faster and, in turn, reduces Bank of America’s REO inventory in White neighborhoods at any point in time. Nevertheless, Bank of America’s poor maintenance and marketing of REO properties in neighborhoods of color in Washington, DC, Phoenix, Tucson, and Newark is consistent with the poor level of maintenance and marketing provided to neighborhoods of color that Complainants investigated throughout the nation. Moreover, in these metropolitan areas, Complainants found that the number of maintenance or marketing deficiencies in neighborhoods of color was consistently, and on average, higher than REO properties in White neighborhoods that were evaluated throughout the nation.

Below, Complainants report the racial disparities in maintenance and marketing of Bank of America REO properties in the 30 metropolitan areas. In addition to the following reported figures, Complainants have attached Exhibit A, which provides photographs of REO properties in neighborhoods of color and White neighborhoods in each of the 30 metropolitan areas. The photographs illustrate the stark differences in maintenance and marketing performed by Bank of America in neighborhoods of color compared to White neighborhoods.

Finally, Complainants have attached Exhibit B, which provides a map of each metropolitan area reporting on the location of each Bank of America property evaluated by Complainants, the racial make-up of the neighborhood in which each REO property is located, and the number of maintenance and marketing deficiencies found at each property. The maps in Exhibit B provide a further illustration of how Bank of America maintains and markets REO properties in neighborhoods of color in a far worse manner than it does in White neighborhoods throughout America.

#### **1. Oakland, Richmond & Concord, California**

In Oakland, Richmond, and Concord, CA, Complainants evaluated 52 Bank of America REO properties, 11 of which were located in predominantly African-African neighborhoods, 5 of which were in predominantly Latino neighborhoods, 23 of which were in predominantly non-White neighborhoods, and 13 of which were located in predominantly White neighborhoods.

**In Oakland, Richmond, and Concord, CA, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 4.5 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (46.2% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 10.3% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (89.7% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 53.8% of REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in neighborhoods of color were 3.4 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (51% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 15% of REO properties in White neighborhoods had 10 or more deficiencies).
- 12.8% of REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In Oakland, Richmond, and Concord, CA, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 1.7 times as likely as REOs in White neighborhoods to have **substantial amounts of trash**. (76.9% of REO properties in neighborhoods of color had substantial amounts of trash, while only 46.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3 times as likely as REOs in White neighborhoods to have **at least 10% to 50% of the property covered in dead grass**. (46.2% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 15.4% of REO properties in White neighborhoods had the same problem).
- 7.7% of REO properties in neighborhoods of color had **a broken mailbox**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 5 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (38.5% of REO properties in neighborhoods of color had unsecured or broken doors, while only 7.7% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 6.7 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (51.3% of REO properties in neighborhoods of color had broken or boarded windows, while only 7.7% of REO properties in White neighborhoods had the same problem).
- 7.7% of REO properties in neighborhoods of color had a **damaged roof**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.67 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (38.5% of REO properties in neighborhoods of color had holes in the structure of the home, while only 23.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have a **trespass or warning sign**. (48.7% of REO properties in neighborhoods of color had a trespass or warning sign, while only 23.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times as likely as REOs in White neighborhoods to be **marketed as distressed**. (17.9% of REO properties in neighborhoods of color were marketed as distressed, while only 7.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to **have no professional “for sale” sign marketing the home**. (71.8% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 46.2% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in White neighborhoods were 1.9 times as likely as REO properties in neighborhoods of color to have a “for sale” sign.
- 15.4% of REO properties in neighborhoods of color had **graffiti**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.1 times as likely as REOs in White neighborhoods to have **peeling paint**. (71.8% of REO properties in neighborhoods of color had peeling paint, while only 23.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.1 times as likely as REOs in White neighborhoods to have **damaged siding**. (48.7% of REO properties in neighborhoods of color had damaged siding, while only 15.4% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.7 times as likely as REOs in White neighborhoods to have **water damage**. (41.0% of REO properties in neighborhoods of

color had damaged siding, while only 15.4% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.7 times as likely as REOs in White neighborhoods to have **a small amount of mold**. (20.5% of REO properties in neighborhoods of color had a small amount of mold, while only 7.7% of REO properties in White neighborhoods had the same problem).
- 17.9% of REO properties in neighborhoods of color had **exposed or tampered-with utilities**, while none of REO properties in White neighborhoods had the same problem).

## 2. Grand Rapids, Michigan

In Grand Rapids, Complainants evaluated 87 Bank of America REO properties, 22 of which were located in predominantly African-African neighborhoods, 3 of which were in predominantly Latino neighborhoods, 9 of which were in predominantly non-White neighborhoods, and 53 of which were located in predominantly White neighborhoods.

**In Grand Rapids, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 6.5 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (18.9% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 2.9% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.2 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (97.1% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 81.1% of REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (82.4% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 39.6% of REO properties in White neighborhoods had 10 or more deficiencies).
- REO properties in neighborhoods of color were 7.2 times as likely as REOs in White neighborhoods to have **15 or more maintenance or marketing deficiencies**. (41.2% of REO properties in neighborhoods of color had 15 or more deficiencies, while only 5.7% of REO properties in White neighborhoods had 15 or more deficiencies).

**In Grand Rapids, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **substantial amounts of trash on the property**. (97.1% of REO properties in neighborhoods of color had substantial amounts of trash on the property, while only 62.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (35.3% of REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 24.5% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times as likely as REOs in White neighborhoods to have **at least 10% to 50% of the property covered in dead grass**. (8.8% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 3.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (35.3% of REO properties in neighborhoods of color had unsecured or broken doors, while only 17.0% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.2 times as likely as REOs in White neighborhoods to have **damaged steps or handrails**. (47.1% of REO properties in neighborhoods of color had damaged steps or handrails, while only 11.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (64.7% of REO properties in neighborhoods of color had broken or boarded windows, while only 30.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.7 times as likely as REOs in White neighborhoods to have **a damaged roof**. (55.9% of REO properties in neighborhoods of color had a damaged roof, while only 15.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have **a damaged fence**. (64.7% of REO properties in neighborhoods of color had a damaged fence, while only 47.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.2 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (44.1% of REO properties in neighborhoods of color had holes in the structure of the home, while only 20.8% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.2 times as likely as REOs in White neighborhoods to have **wood rot**. (61.8% of REO properties in neighborhoods of color had wood rot, while only 28.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.7 times as likely as REOs in White neighborhoods to have a **trespassing or warning sign**. (50.0% of REO properties in neighborhoods of color had a trespassing or warning sign, while only 30.2% of REO properties in White neighborhoods had the same problem).
- 17.7% of REO properties in neighborhoods of color had **graffiti**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have **peeling paint**. (97.1% of REO properties in neighborhoods of color had peeling paint, while only 71.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have **damaged siding**. (88.2% of REO properties in neighborhoods of color had damaged siding, while only 64.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **broken or hanging gutters**. (23.5% of REO properties in neighborhoods of color had broken or hanging gutters, while only 15.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.5 times as likely as REOs in White neighborhoods to have **water damage**. (47.1% of REO properties in neighborhoods of color had water damage, while only 18.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.2 times as likely as REOs in White neighborhoods to have **a small amount of mold**. (64.7% of REO properties in neighborhoods of color had water damage, while only 52.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **pervasive mold**. (11.8% of REO properties in neighborhoods of color had pervasive mold, while only 7.6% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times as likely as REOs in White neighborhoods to have **exposed or tampered-with utilities**. (26.5% of REO properties

in neighborhoods of color had exposed or tampered-with utilities, while only 15.1% of REO properties in White neighborhoods had the same problem).

### 3. Atlanta, Georgia

In Atlanta, Complainants' original complaint and amended complaints had addressed 71 Bank of America REO properties. Complainants have now investigated 117 Bank of America REO properties, 95 of which were located in predominantly African-African neighborhoods, 1 of which was in a predominantly Latino neighborhood, 7 of which were in predominantly non-White neighborhoods, and 14 of which were located in predominantly White neighborhoods.

**In Atlanta, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 4.4 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (42.9% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 9.7% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (90.3% of REO properties in neighborhoods of color had **5 or more deficiencies**, while only 57.1% of properties in White neighborhoods had 5 or more deficiencies).
- 48.5% of REO properties in neighborhoods of color had **10 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.
- 8.7% of REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In Atlanta, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 2.9 times as likely as REOs in White neighborhoods to have **substantial amounts of trash**. (61.2% of REO properties in neighborhoods of color had substantial amounts of trash, while only 21.4% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **overgrown grass and accumulated leaves**. (60.2% of REO properties in neighborhoods of color had overgrown grass and accumulated leaves, while only 28.6% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.9 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (41.7% of REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 21.4% of REO properties in White neighborhoods had the same problem).
- 19.4% of REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in invasive plants**, while none of REO properties in White neighborhoods had the same problem.
- 19.4% of REO properties in neighborhoods of color had a **broken mailbox**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 4.5 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (32.0% of REO properties in neighborhoods of color had unsecured or broken doors, while only 7.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.7 times as likely as REOs in White neighborhoods to have **damaged steps or handrails**. (26.2% of REO properties in neighborhoods of color had damaged steps or handrails, while only 7.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.3 times as likely as REOs in White neighborhoods to have a **damaged roof**. (23.3% of REO properties in neighborhoods of color had a damaged roof, while only 7.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (28.2% of REO properties in neighborhoods of color had holes in the structure of the home, while only 7.1% of REO properties in White neighborhoods had the same problem).
- 7.8% of REO properties in neighborhoods of color were **marketed as distressed**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2 times as likely as REOs in White neighborhoods to **have no professional “for sale” sign marketing the home**. (83.5% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 42.9% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in White neighborhoods were 3.5 times as likely as REO properties in neighborhoods of color to have a “for sale” sign.
- 6.8% of REO properties in neighborhoods of color had **graffiti**, while none of REO properties in White neighborhoods had the same problem.

- REO properties in neighborhoods of color were 1.3 times as likely as REOs in White neighborhoods to have **peeling paint**. (54.4% of REO properties in neighborhoods of color had peeling paint, while only 42.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 5.6 times as likely as REOs in White neighborhoods to have **damaged siding**. (39.8% of REO properties in neighborhoods of color had damaged siding, while 7.1% of REO properties in White neighborhoods had the same problem).
- 23.3% of REO properties in neighborhoods of color had **broken or hanging gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 10.7% of REO properties in neighborhoods of color had **water damage**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.3 times as likely as REOs in White neighborhoods to have **a small amount of mold**. (46.6% of REO properties in neighborhoods of color had a small amount of mold, while only 14.3% of REO properties in White neighborhoods had the same problem).
- 7.8% of REO properties in neighborhoods of color had **pervasive mold**, while none of the REO properties in White neighborhoods had the same problem.
- 26.2% of REO properties in neighborhoods of color had **exposed or tampered-with utilities**, while none of the REO properties in White neighborhoods had the same problem.

#### 4. Dayton, Ohio

In Dayton, Ohio, Complainants evaluated 24 Bank of America REO properties, 12 of which were located in predominantly African-American neighborhoods, and 12 of which were located in predominantly White neighborhoods.

- REO properties in African-American neighborhoods were 1.8 times as likely as REOs in White neighborhoods to have **10 or more deficiencies**. (58.3% of REO properties in African-American neighborhoods had 10 or more deficiencies, while only 33.3% of REO properties in White neighborhoods had 10 or more deficiencies).
- 16.7% of REO properties in African-American neighborhoods had **15 or more deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In Dayton, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in African-American neighborhoods were 1.5 times as likely as REOs in White neighborhoods to have **overgrown grass or accumulated leaves**. (75.0% of REO properties in African-American neighborhoods had overgrown grass or accumulated leaves, while only 50.0% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 1.5 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (50.0% of REO properties in African-American neighborhoods had overgrown or dead shrubbery, while only 33.3% of REO properties in White neighborhoods had the same problem).
- 16.7% of REO properties in African-American neighborhoods had **at least 10% and 50% of the property covered in dead grass**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in African-American neighborhoods were 1.8 times as likely as REOs in White neighborhoods to have **at least 10% to 50% of the property covered in invasive plants**. (75.0% of REO properties in African-American neighborhoods had at least 10% to 50% of the property covered in invasive plants, while only 41.7% of the REO properties in White neighborhoods have the same problem).
- REO properties in African-American neighborhoods were 2 times as likely as REOs in White neighborhoods to have a **broken mailbox**. 33.3% of REO properties in African-American neighborhoods had a broken mailbox, while 16.7% of the REO properties in White neighborhoods have the same problem.
- REO properties in African-American neighborhoods were 1.7 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (41.7% of REO properties in African-American neighborhoods had unsecured or broken doors, while only 25.0% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 1.7 times as likely as REOs in White neighborhoods to have **damaged steps**. (41.7% of REO properties in African-American neighborhoods had damaged steps, while only 25.0% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 1.5 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (50.0% of REO properties in African-American neighborhoods had broken or boarded windows, while only 33.3% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 3 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. 50.0% of REO properties in African-American neighborhoods had holes in the structure of the home, while only 16.7% of REO properties in White neighborhoods had the same problem).

- REO properties in African-American neighborhoods were 1.7 times as likely as REOs in White neighborhoods to have **peeling paint**. (83.3% of REO properties in African-American neighborhoods had peeling paint, while only 50.0% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 2 times as likely as REOs in White neighborhoods to have **missing or out of place gutters**. (33.3% of REO properties in African-American neighborhoods had missing or out of place gutters, while only 16.7% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 2.5 times as likely as REOs in White neighborhoods to have **broken or hanging gutters**. (41.7% of REO properties in African-American neighborhoods had broken or hanging gutters, while only 16.7% of REO properties in White neighborhoods had the same problem).
- REO properties in African-American neighborhoods were 2 times as likely as REOs in White neighborhoods to have **exposed or tampered-with utilities**. (50.0% of REO properties in African-American neighborhoods had exposed or tampered with utilities, while only 25.0% of REO properties in White neighborhoods had the same problem).

## 5. Miami, Florida

In Miami, Florida, Complainants evaluated 25 Bank of America REO properties, 8 of which were located in predominantly African-American neighborhoods, 2 of which were located in predominantly Latino neighborhoods, 4 of which were in predominantly non-White neighborhoods, and 11 of which were located in predominantly White neighborhoods.

**In Miami, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 2.1 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (45.5% of REO properties in White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 21.4% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 3.1 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (28.6% of REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 9.1% of the REO properties in White neighborhoods had 10 or more deficiencies).

**In Miami, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **substantial amounts of trash**. (57.1% of REO properties in neighborhoods of color had substantial amounts of trash, while only 36.4% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **accumulated mail**. (14.3% of REO properties in neighborhoods of color had accumulated mail, while only 9.1% of REO properties in White neighborhoods had the same problem).
- 42.9% of REO properties in neighborhoods of color had **overgrown or dead shrubbery**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **at least 10% to 50% of the property covered in invasive plants**. (14.3% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 9.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.4 times as likely as REOs in White neighborhoods to have a **broken mailbox**. (21.4% of REO properties in neighborhoods of color had a broken mailbox, while only 9.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have an **unsecured or broken door**. (50.0% of REO properties in neighborhoods of color had unsecured or broken doors, while only 36.4% of REO properties in White neighborhoods had the same problem).
- 42.9% of REO properties in neighborhoods of color had **broken or boarded windows**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.1 times as likely as REOs in White neighborhoods to have a **damaged roof**. (28.6% of REO properties in neighborhoods of color had a damaged roof, while only 9.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have a **damaged fence**. (28.6% of REO properties in neighborhoods of color had a damaged fence, while only 18.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (50.0% of REO properties in neighborhoods of color had holes in the structure of the home, while only 36.4% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.8 times as likely as REOs in White neighborhoods to have rotted wood in the structure. (50% of REO properties in neighborhoods of color had **wood rot**, while only 27.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have signage on unauthorized occupancy. (42.9% of REO properties in neighborhoods of color had **trespassing or warning signs**, while only 27.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.3 times as likely as REOs in White neighborhoods to have **peeling paint**. (35.7% of REO properties in neighborhoods of color had peeling paint, while only 27.3% of REO properties in White neighborhoods had the same problem).

## 6. Dallas, Texas

In Dallas, Texas, Complainants' original complaint and amended complaints had addressed 65 Bank of America REO properties. Complainants have now investigated 86 Bank of America REO properties, 37 of which were located in predominantly African-American neighborhoods, 27 of which were in predominantly Latino neighborhoods, 8 of which were in predominantly non-White neighborhoods, and 14 of which were located in predominantly White neighborhoods.

**In Dallas, Texas, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 2.6 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (28.6% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 11.1% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.2 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (88.9% of REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 71.4% of the REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in neighborhoods of color were 4.3 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (44.4% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 14.3% of REO properties in White neighborhoods had 10 or more deficiencies).

- 6.9% of REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In Dallas, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **substantial amounts of trash**. (59.7% of REO properties in neighborhoods of color had substantial amounts of trash, while only 28.6% of REO properties in White neighborhoods had the same problem).
- 16.7% of REO properties in neighborhoods of color had **accumulated mail**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.5 times as likely as REOs in White neighborhoods to have **overgrown grass or accumulated leaves**. (72.2% of REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 28.6% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.7 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (59.7% of REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 35.7% of REO properties in White neighborhoods had the same problem).
- 13.9% of REO properties in neighborhoods of color had a **broken mailbox**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 4.5 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (31.9% of REO properties in neighborhoods of color had unsecured or broken doors, while only 7.1% of REO properties in White neighborhoods had the same problem).
- 12.5% of REO properties in neighborhoods of color had **damaged steps or handrails**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.2 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (31.9% of REO properties in neighborhoods of color had broken or boarded windows, while only 14.3% of REO properties in White neighborhoods had the same problem).
- 9.7% of REO properties in neighborhoods of color were **marketed as distressed**, while none of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.3 times as likely as REOs in White neighborhoods to have **no professional “for sale” sign marketing the home**. (80.6% of

REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 64.3% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **peeling paint**. (55.6% of REO properties in neighborhoods of color had peeling paint, while only 35.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.4 times as likely as REOs in White neighborhoods to have **damaged siding**. (48.6% of REO properties in neighborhoods of color had damaged siding, while only 14.3% of REO properties in White neighborhoods had the same problem).
- 23.6% of REO properties in neighborhoods of color had **water damage**, while none of the REO properties in White neighborhoods had the same problem.
- 13.9% of REO properties in neighborhoods of color had **a small amount of mold**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 4.5 times as likely as REOs in White neighborhoods to have **exposed or tampered-with utilities**. (31.9% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 7.1% of REO properties in White neighborhoods had the same problem).

## 7. Phoenix, Arizona

In Phoenix, Arizona, Complainants evaluated 8 Bank of America REO properties, 7 of which were in predominantly Latino neighborhoods, and 1 of which was located in a predominantly White neighborhood. As noted above, in Phoenix, Complainants found that Bank of America engaged in poor maintenance and marketing of REO properties in neighborhoods of color. This poor maintenance and marketing in neighborhoods of color was consistent with the poor maintenance and marketing of Bank of America’s REO properties in neighborhoods of color throughout the nation that Complainants found in their investigation. Furthermore, Bank of America’s REO properties in neighborhoods of color in Phoenix had a higher average number of maintenance or marketing deficiencies than REO properties in White neighborhoods that Complainants evaluated nationally.

### **In Phoenix, Complainants specifically found that:**

- None of the REO properties in neighborhoods of color had **fewer than 5 maintenance or marketing deficiencies**, and the REO property in a White neighborhood had fewer than five deficiencies.
- 100% of the REO properties in neighborhoods of color had **5 or more maintenance or marketing deficiencies**.

- 57.1% of REO properties in neighborhoods of color had **10 or more maintenance or marketing deficiencies**.
- 14.3% of REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**.
- 71.0% of REO properties in neighborhoods of color had **substantial amounts of trash**, while the REO property in a White neighborhood did not have the same problem.
- 28.6% of REO properties in neighborhoods of color had **overgrown grass or accumulated leaves**, while the REO property in a White neighborhood did not have the same problem.
- 42.9% of REO properties in neighborhoods of color had **overgrown or dead shrubbery**, while the REO property in a White neighborhood did not have the same problem.
- 71.4% of REO properties in neighborhoods of color had **50% or more of the property covered in dead grass**, while the REO property in a White neighborhood did not have the same problem.
- 42.9% of REO properties in neighborhoods of color had **unsecured or broken doors**, while the REO property in a White neighborhood did not have the same problem.
- 71.4% of REO properties in neighborhoods of color had **broken or boarded windows**, while the REO property in a White neighborhood did not have the same problem.
- 57.1% of REO properties in neighborhoods of color had a **damaged roof**, while the REO property in a White neighborhood did not have the same problem.
- 85.7% of REO properties in neighborhoods of color had a **damaged fence**, while the REO property in a White neighborhood did not have the same problem.
- 42.9% of REO properties in neighborhoods of color had **wood rot**, while the REO property in a White neighborhood did not have the same problem.
- 71.4% of REO properties in neighborhoods of color had a **trespassing or warning sign**, while the REO property in a White neighborhood did not have the same problem.
- 85.7% of REO properties in neighborhoods of color had **no professional “for sale” sign marketing the home**, while the REO property in a White neighborhood did not have the same problem.
- 100% of REO properties in neighborhoods of color had **peeling paint**, while the REO property in a White neighborhood did not have the same problem.

- 57.1% of REO properties in neighborhoods of color had **damaged siding**, while the REO property in a White neighborhood did not have the same problem.
- 42.9% of REO properties in neighborhoods of color had **missing or out of place gutters**, while the REO property in a White neighborhood did not have the same problem.
- 28.6% of REO properties in neighborhoods of color had **water damage**, while the REO property in a White neighborhood did not have the same problem.
- 28.6% of REO properties in neighborhoods of color had **exposed or tampered-with utilities**.

## 8. Washington, DC / Prince George's County, MD

In the Washington, DC / Prince George's County, MD metropolitan area, Complainants' original complaint and amended complaints had addressed 41 Bank of America REO properties. Complainants have now investigated 63 Bank of America REO properties, 56 of which were in predominantly African-American neighborhoods, 3 of which were in predominantly non-White neighborhoods, and 4 of which was located in predominantly White neighborhoods. As noted above, in Washington, DC, Complainants found that Bank of America engaged in poor maintenance and marketing of REO properties in neighborhoods of color. This poor maintenance and marketing in neighborhoods of color was consistent with the poor maintenance and marketing of Bank of America's REO properties in neighborhoods of color throughout the nation that Complainants found in their investigation. Furthermore, Bank of America's REO properties in neighborhoods of color in Washington, DC had a higher average number of maintenance or marketing deficiencies than REO properties in White neighborhoods that Complainants evaluated nationally.

### **In the Washington, DC / Prince George's County, MD metropolitan area, Complainants found that:**

- Only 5.4% of the REO properties in neighborhoods of color had **fewer than 5 maintenance or marketing deficiencies**, while 100.0% of REO properties in White neighborhoods had fewer than 5 deficiencies.
- 94.6% of the REO properties in neighborhoods of color **had 5 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 5 or more deficiencies.
- 60.7% of REO properties in neighborhoods of color had **10 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.
- 14.3% of properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

- 69.6% of REO properties in neighborhoods of color had **substantial amounts of trash** on the premises, while none of the REO properties in White neighborhoods had the same problem.
- 25.0% of REO properties in neighborhoods of color had **accumulated mail**, while none of the REO properties in White neighborhoods had the same problem.
- 62.5% of REO properties in neighborhoods of color had **overgrown grass or accumulated leaves**, while none of the REO properties in White neighborhoods had the same problem.
- 60.7% of REO properties in neighborhoods of color had **overgrown or dead shrubbery**, while none of the REO properties in White neighborhoods had the same problem.
- 41.1% of REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 17.9% of REO properties in neighborhoods of color had **50% or more of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 16.1% of REO properties in neighborhoods of color had a **broken mailbox**, while none of the REO properties in White neighborhoods had the same problem.
- 30.4% of REO properties in neighborhoods of color had **unsecured or broken doors**, while none of the REO properties in White neighborhoods had the same problem.
- 17.9% of REO properties in neighborhoods of color had **damaged steps or handrails**, while none of the REO properties in White neighborhoods had the same problem.
- 41.1% of REO properties in neighborhoods of color had **broken or boarded windows**, while none of the REO properties in White neighborhoods had the same problem.
- 19.6% of REO properties in neighborhoods of color had a **damaged roof**, while none of the REO properties in White neighborhoods had the same problem.
- 46.4% of REO properties in neighborhoods of color had a **damaged fence**, while none of the REO properties in White neighborhoods had the same problem.
- 23.2% of REO properties in neighborhoods of color had **holes in the structure of the home**, while none of the REO properties in White neighborhoods had the same problem.
- 25.0% of REO properties in neighborhoods of color had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.

- 21.4% of REO properties in neighborhoods of color were **marketed as distressed**, while none of the REO properties in White neighborhoods had the same problem.
- 10.7% of REO properties in neighborhoods of color **had broken or discarded signage**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.3 times as likely as REOs in White neighborhoods to have **peeling paint**. (64.3% of REO properties in neighborhoods of color had peeling paint, while only 50% of REO properties in White neighborhoods had the same problem).
- 39.3% of REO properties in neighborhoods of color had **damaged siding**, while none of the REO properties in White neighborhoods had the same problem.
- 32.1% of REO properties in neighborhoods of color had **missing or out of place gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 28.6% of REO properties in neighborhoods of color had **broken or hanging gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 23.2% of REO properties in neighborhoods of color had **obstructed gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 28.6% of REO properties in neighborhoods of color had **water damage**, while none of the REO properties in White neighborhoods had the same problem.
- 37.5% of REO properties in neighborhoods of color had **a small amount of mold**, while none of the REO properties in White neighborhoods had the same problem.
- 16.1% of REO properties in neighborhoods of color had **pervasive mold**, while none of the REO properties in White neighborhoods had the same problem.
- 37.5% of REO properties in neighborhoods of color had **exposed or tampered-with utilities**, while none of the REO properties in White neighborhoods had the same problem.

## 9. Orlando, Florida

In Orlando, Complainants' p original complaint and amended complaints had addressed 14 Bank of American REO properties. Complainants have now investigated 32 Bank of America REO properties, 15 of which were located in predominantly African-American neighborhoods; 2 of which were located in predominantly Latino neighborhoods; 1 of which was located in a predominantly non-White neighborhood; and 14 of which were located in predominantly White neighborhoods.

**In Orlando, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 21.4% of REO properties in White communities had **fewer than 5 maintenance or marketing deficiencies**, while none of the REO properties in communities of color had fewer than 5 deficiencies.
- REO properties in African-African neighborhoods were 1.3 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (100% of REO properties in African-African neighborhoods had 5 or more deficiencies, while only 78.6% of REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in African-African neighborhoods were 2.9 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (83.3% of REO properties in African-African neighborhoods had 10 or more deficiencies, while only 28.6% of REO properties in White neighborhoods had 10 or more deficiencies).
- REO properties in African-African neighborhoods were 2.4 times as likely as REOs in White neighborhoods to have **15 or more maintenance or marketing deficiencies**. (16.7% of REO properties in African-African neighborhoods had 15 or more deficiencies, while only 7.1% of REO properties in White neighborhoods had 15 or more deficiencies).

**In Orlando, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in African-African neighborhoods were 3.4 times as likely as REOs in White neighborhoods to have **substantial amounts of trash** on the premises. (72.2% of REO properties in African-African neighborhoods had substantial amounts of trash on the premises, while only 21.4% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.4 times as likely as REOs in White neighborhoods to have **overgrown grass or accumulated leaves**. (38.9% of REO properties in African-African neighborhoods had overgrown grass or accumulated leaves, while only 28.6% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.4 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (38.9% of REO properties in African-African neighborhoods had overgrown or dead shrubbery, while only 28.6% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 2.7 times as likely as REOs in White neighborhoods to have **50% or more of the property covered in dead grass**. (38.9% of REO properties in African-African neighborhoods had 50% or more of the

property covered in dead grass, while only 14.3% of REO properties in White neighborhoods had the same problem).

- 38.9% of REO properties in African-African neighborhoods had **50% or more of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 11.1% of REO properties in African-African neighborhoods had **a broken mailbox**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in African-African neighborhoods were 1.8 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (38.9% of REO properties in African-African neighborhoods had unsecured or broken doors, while only 21.4% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 3.4 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (72.2% of REO properties in African-African neighborhoods had broken or boarded windows, while only 21.4% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.9 times as likely as REOs in White neighborhoods to have a **damaged fence**. (83.3% of REO properties in African-African neighborhoods had a damaged fence, while only 42.9% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.9 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (66.7% of REO properties in African-African neighborhoods had holes in the structure of the home, while only 35.7% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.7 times as likely as REOs in White neighborhoods to have **wood rot**. (83.3% of REO properties in African-African neighborhoods had wood rot, while only 50.0% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.7 times as likely as REOs in White neighborhoods to **have no professional “for sale” sign marketing the home**. (72.2% of REO properties in African-African neighborhoods had no professional “for sale” sign marketing the home, while only 42.9% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in White were 2.1 times as likely to have a for sale sign than REO properties in African-African neighborhoods.
- REO properties in African-African neighborhoods were 2.4 times as likely as REOs in White neighborhoods to have **graffiti**. (16.7% of REO properties in African-African

neighborhoods had graffiti, while only 7.1% of REO properties in White neighborhoods had the same problem).

- REO properties in African-African neighborhoods were 1.6 times as likely as REOs in White neighborhoods to have **peeling paint**. (66.7% of REO properties in African-African neighborhoods had peeling paint, while only 42.9% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 1.8 times as likely as REOs in White neighborhoods to have **damaged siding**. (38.9% of REO properties in African-African neighborhoods had damaged siding, while only 21.4% of REO properties in White neighborhoods had the same problem).
- REO properties in African-African neighborhoods were 3.9 times as likely as REOs in White neighborhoods to have **missing or out of place gutters**. (27.8% of REO properties in African-African neighborhoods had missing or out of place gutters, while only 7.1% of REO properties in White neighborhoods had the same problem).
- 11.1% of REO properties in African-African neighborhoods had **water damage**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in African-African neighborhoods were 2.9 times as likely as REOs in White neighborhoods to have **exposed or tampered with-utilities**. (61.1% of REO properties in African-African neighborhoods had exposed or tampered-with utilities, while only 21.4% of REO properties in White neighborhoods had the same problem).

## 10. Charleston, South Carolina

In Charleston, South Carolina, Complainants evaluated 5 Bank of America REO properties, 3 of which were located in predominantly African-African neighborhoods, and 2 of which were located in predominantly White neighborhoods.

**In Charleston, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 100.0% of REO properties in White neighborhoods had **fewer than 5 deficiencies**, while none of the REO properties in African-African neighborhoods had fewer than 5 deficiencies.
- 100.0% of REO properties in African-African neighborhoods had **5 or more deficiencies**, while none of the REO properties in White neighborhoods had 5 or more deficiencies.
- 33.3% of REO properties in African-African neighborhoods had **10 or more deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In Charleston, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- 33.3% of REO properties in African-African neighborhoods had **substantial amounts of trash**, while none of the REO properties in White neighborhoods had the same problem.
- 66.7% of REO properties in African-African neighborhoods had **overgrown grass or accumulated leaves**, while none of the REO properties in White neighborhoods had the same problem.
- 66.7% of REO properties in African-African neighborhoods had **overgrown or dead shrubbery**, while none of the REO properties in White neighborhoods had the same problem.
- 33.3% of REO properties in African-African neighborhoods had **at least 10% to 50% of the property covered in dead grass**, while none of the REO properties in White neighborhoods had the same problem.
- 66.7% of REO properties in African-African neighborhoods had **at least 10% to 50% of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 33.3% of REO properties in African-African neighborhoods had **unsecured or broken doors**, while none of the REO properties in White neighborhoods had the same problem.
- 33.3% of REO properties in African-African neighborhoods had **broken or boarded windows**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in African-African neighborhoods were 2 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (100.0% of REO properties in African-African neighborhoods had holes in the structure of the home, while only 50.0% of REO properties in White neighborhoods had the same problem).
- 33.3% of REO properties in African-African neighborhoods had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.
- 33.3% of REO properties in African-African neighborhoods had **peeling paint**, while none of the REO properties in White neighborhoods had the same problem.
- 33.3% of REO properties in African-African neighborhoods had **damaged siding**, while none of the REO properties in White neighborhoods had the same problem.
- 66.7% of REO properties in African-African neighborhoods had **water damage**, while none of the REO properties in White neighborhoods had the same problem.

- 33.3% of REO properties in African-African neighborhoods had **a small amount of mold**, while none of the REO properties in White neighborhoods had the same problem.

## 11. Chicago, Illinois

In the Chicago metropolitan area, Complainants' original complaint and amended complaints had addressed 46 Bank of America REO properties. Complainants have now investigated 85 Bank of America REO properties, 34 of which were located in predominantly African-African neighborhoods, 12 of which were located in predominantly Latino neighborhoods, 10 of which were located in predominantly non-White neighborhoods, and 29 of which were located in predominantly White neighborhoods.

**In Chicago, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 5.8 times as likely as REOs in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (41.4% of REO properties in White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 7.1% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in African-African neighborhoods were 1.6 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (91.9% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 58.6% of REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in African-African neighborhoods were 6.7 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (46.4% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 6.9% of REO properties in White neighborhoods had 10 or more deficiencies).
- 5.4% of REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In Chicago, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **substantial amounts of trash** on the premises. (64.3% of REO properties in neighborhoods of color had substantial amounts of trash, while only 31.0% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 6.5 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (44.6% of REO properties in

neighborhoods of color had unsecured or broken doors, while only 6.9% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 4.1 times as likely as REOs in White neighborhoods to have **damaged steps or handrails**. (28.6% of REO properties in neighborhoods of color had damaged steps or handrails, while only 6.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.8 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (66.1% of REO properties in neighborhoods of color had broken or boarded windows, while only 17.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **a damaged roof**. (26.8% of REO properties in neighborhoods of color had a damaged roof, while only 17.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.6 times as likely as REOs in White neighborhoods to have **a damaged fence**. (44.6% of REO properties in neighborhoods of color had a damaged fence, while only 17.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.6 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (25.0% of REO properties in neighborhoods of color had holes in the structure of the home, while only 6.9% of REO properties in White neighborhoods had the same problem).
- 16.1% of REO properties in neighborhoods of color had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.8 times as likely as REOs in White neighborhoods to have **trespassing or warning signs**. (37.5% of REO properties in neighborhoods of color had a trespassing or warning sign, while only 20.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.2 times as likely as REOs in White neighborhoods to **have no professional “for sale” sign marketing the home**. (67.9% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 58.6% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in White neighborhoods were 1.3 times more likely than REOs in neighborhoods of color to have a “for sale” sign.
- REO properties in neighborhoods of color were 3.2 times as likely as REOs in White neighborhoods to have **graffiti**. (10.7% of REO properties in neighborhoods of color had

graffiti, while only 3.4% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.7 times as likely as REOs in White neighborhoods to have **peeling paint**. (55.4% of REO properties in neighborhoods of color had peeling paint, while only 20.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times as likely as REOs in White neighborhoods to have **damaged siding**. (51.8% of REO properties in neighborhoods of color had damaged siding, while only 34.5% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.8 times as likely as REOs in White neighborhoods to have **missing or out of place gutters**. (28.6% of REO properties in neighborhoods of color had missing or out of place gutters, while only 10.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REOs in White neighborhoods to have **obstructed gutters**. (37.5% of REO properties in neighborhoods of color had obstructed gutters, while only 24.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times as likely as REOs in White neighborhoods to have **a small amount of mold**. (23.6% of REO properties in neighborhoods of color had a small amount of mold, while only 10.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.7 times as likely as REOs in White neighborhoods to have **exposed or tampered with-utilities**. (32.1% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 6.9% of REO properties in White neighborhoods had the same problem).

## 12. Milwaukee, Wisconsin

In Milwaukee, Complainants' original complaint and amended complaints had addressed 45 Bank of America REO properties. Complainants have now investigated 110 Bank of America REO properties, 59 of which were located in predominantly African-American neighborhoods, 12 of which were located in predominantly Latino neighborhoods, 13 of which were located in predominantly non-White neighborhoods, and 26 of which were located in predominantly White neighborhoods.

**In Milwaukee, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 88.5% of REO properties in White neighborhoods had **fewer than 5 maintenance or**

**marketing deficiencies**, while only 23.8% of REO properties in neighborhoods of color had fewer than 5 deficiencies.

- REO properties in African-African neighborhoods were 6.6 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (76.2% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 11.5% of REO properties in White neighborhoods had 5 or more deficiencies).
- 8.3% of REO properties in neighborhoods of color had **10 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In Milwaukee, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 2.6 times as likely as REOs in White neighborhoods to have **substantial amounts of trash** on the premises. (39.3% of REO properties in neighborhoods of color had substantial amounts of trash, while only 15.4% of REO properties in White neighborhoods had the same problem).
- 17.9% of REO properties in neighborhoods of color had **accumulated mail**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.9 times as likely as REOs in White neighborhoods to have **overgrown grass or accumulated leaves**. (29.8% of REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 15.4% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.0 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (38.1% of REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 19.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.3 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (38.1% of REO properties in neighborhoods of color had unsecured or broken doors, while only 11.5% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 5.2 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (59.5% of REO properties in neighborhoods of color had broken or boarded windows, while only 11.5% of REO properties in White neighborhoods had the same problem).
- 22.6% of REO properties in neighborhoods of color had **a damaged fence**, while none of the REO properties in White neighborhoods had the same problem.

- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to **have no professional “for sale” sign marketing the home**. (90.5% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 65.4% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in white neighborhoods were 3.6 times as likely to have a “for sale” sign as REO properties in neighborhoods of color.
- REO properties in neighborhoods of color were 2.2 times as likely as REOs in White neighborhoods to have **graffiti**. (8.3% of REO properties in neighborhoods of color had graffiti, while only 3.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.7 times as likely as REOs in White neighborhoods to have **missing or out of place gutters**. (13.1% of REO properties in neighborhoods of color had missing or out of place gutters, while only 7.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.8 times as likely as REOs in White neighborhoods to have **broken or hanging gutters**. (14.3% of REO properties in neighborhoods of color had broken or hanging gutters, while only 3.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 5.3 times as likely as REOs in White neighborhoods to have **exposed or tampered-with utilities**. (20.2% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 3.8% of REO properties in White neighborhoods had the same problem).

### **13. Indianapolis, Indiana**

In Indianapolis, Complainants evaluated 22 Bank of America REO properties, 6 of which were located in predominantly African-African neighborhoods, 1 of which was located in a predominantly non-White neighborhood, and 15 of which were located in predominantly White neighborhoods.

**In Indianapolis, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 20.0% of REO properties in White neighborhoods had **fewer than 5 maintenance or marketing deficiencies**, while none of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- REO properties in African-African neighborhoods were 1.3 times as likely as REOs in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (100.0% of REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while 80.0% of REO properties in White neighborhoods had 5 or more deficiencies).

- REO properties in African-African neighborhoods were 2.6 times as likely as REOs in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (85.7% of REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 33.3% of REO properties in White neighborhoods had 10 or more deficiencies).

**In Indianapolis, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 1.2 times as likely as REOs in White neighborhoods to have **substantial amounts of trash on the property**. (71.4% of REO properties in neighborhoods of color had substantial amounts of trash, while only 60.0% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.7 times as likely as REOs in White neighborhoods to have **overgrown grass or accumulated leaves**. (71.4% of REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 26.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to have **overgrown or dead shrubbery**. (57.1% of REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 40.0% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.3 times as likely as REOs in White neighborhoods to have **at least 10% to 50% of the property covered in dead grass**. (28.6% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 6.7% of REO properties in White neighborhoods had the same problem).
- 14.3% of REO properties in neighborhoods of color had **50% or more of the property covered in dead grass**, while none of REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **at least 10% to 50% of the property covered in invasive plants**. (28.6% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 13.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **unsecured or broken doors**. (57.1% of REO properties in neighborhoods of color had unsecured or broken doors, while only 26.7% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **damaged steps or handrails**. (28.6% of REO properties in neighborhoods of color had damaged steps or handrails, while only 13.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times as likely as REOs in White neighborhoods to have **broken or boarded windows**. (85.7% of REO properties in neighborhoods of color had broken or boarded windows, while only 46.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 6.4 times as likely as REOs in White neighborhoods to have **a damaged roof**. (42.9% of REO properties in neighborhoods of color had a damaged roof, while only 6.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times as likely as REOs in White neighborhoods to have **a damaged fence**. (71.4% of REO properties in neighborhoods of color had a damaged fence, while only 40.0% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 6.4 times as likely as REOs in White neighborhoods to have **holes in the structure of the home**. (42.9% of REO properties in neighborhoods of color had holes in the structure of the home, while only 6.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.2 times as likely as REOs in White neighborhoods to have **a trespassing or warning sign**. (83.3% of REO properties in neighborhoods of color had a trespassing or warning sign, while only 60.0% of REO properties in White neighborhoods had the same problem).
- 28.6% of REO properties in neighborhoods of color **were marketed as distressed**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.4 times as likely as REOs in White neighborhoods to **have no professional “for sale” sign marketing the home**. (100.0% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 73.3% of REO properties in White neighborhoods had the same problem).
- 14.3% of REO properties in neighborhoods of color had **graffiti**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.1 times as likely as REOs in White neighborhoods to have **missing or out of place gutters**. (28.6% of REO properties in neighborhoods of color had missing or out of place gutters, while only 13.3% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 4.3 times as likely as REOs in White neighborhoods to have **broken or hanging gutters**. (57.1% of REO properties in neighborhoods of color had broken or hanging gutters, while only 13.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.3 times as likely as REOs in White neighborhoods to have **obstructed gutters**. (57.1% of REO properties in neighborhoods of color had obstructed gutters, while only 13.3% of REO properties in White neighborhoods had the same problem).
- 14.3% of REO properties in neighborhoods of color had **water damage**, while none of the REO properties in White neighborhoods had the same problem.
- 14.3% of REO properties in neighborhoods of color had **a small amount of mold**, while none of the REO properties in White neighborhoods had the same problem.

#### 14. Memphis, Tennessee

In Memphis, TN, Complainants' original complaint and amended complaints had addressed 12 Bank of America REO properties. Complainants have now investigated 35 Bank of America REO properties, 23 of which were located in African-American neighborhoods, 3 of which were located in non-White neighborhoods, and 9 of which were located in predominantly White neighborhoods.

**In Memphis, TN, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 66.7% of the REO properties in White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- REO properties in neighborhoods of color were 3.0 times as likely as REO properties in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (100% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 33.3% of REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in neighborhoods of color were 5.2 times more likely than REO properties in White neighborhoods to have **10 or more maintenance or marketing deficiencies**. (57.7% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 11.1% of REO properties in White neighborhoods had 10 or more deficiencies).

- 11.5% of the REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 more deficiencies.

**In Memphis, TN, Complaints found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 4.8 times as likely as REO properties in White neighborhoods to have **substantial amounts of trash**. (53.8% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 11.1% of the REO properties in White neighborhoods had the same problem.).
- REO properties in neighborhoods of color were 2.8 times as likely as REO properties in White neighborhoods to have **overgrown grass and accumulated leaves**. (61.5% of properties in neighborhoods of color had overgrown grass and accumulated leaves, while only 22.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (69.2% of properties in neighborhoods of color had overgrown or dead shrubbery, while only 33.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REO properties in White neighborhoods to have **at least 10% to 50% of the property covered in invasive plants**. (23.1% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 11.1% of the REO properties in White neighborhoods had the same problem).
- 15.4% of the REO properties in neighborhoods of color had a **broken mailbox** while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.8 times as likely as REO properties in White neighborhoods to have **unsecured or broken doors**. (61.5% of REO properties in neighborhoods of color had unsecured or broken doors, while only 33.3% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REO properties in White neighborhoods to have **broken or boarded windows**. (46.2% of REO properties in neighborhoods of color had broken or boarded windows, while only 22.2% of REO properties in White neighborhoods had the same problem).
- 61.5% of REO properties in neighborhoods of color had **holes in the structure of the home**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.7 times as likely as REO properties in White neighborhoods to have **wood rot**. (38.5% of REO properties in neighborhoods of

color had wood rot, while only 22.2% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.6 times as likely as REO properties in White neighborhoods to **have no professional “for sale” sign marketing the home**. (88.5% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home while only 55.6% of REO properties in White neighborhoods had the same problem).
- 23.1% of REO properties in neighborhoods of color had **graffiti**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.8 times as likely as properties in White neighborhoods to have **peeling paint**. (42.3% of REO properties in neighborhoods of color had peeling paint, while only 11.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.8 times as likely as REO properties in White neighborhoods to have **damaged siding**. (42.3% of REO properties in neighborhoods of color had damaged siding, while only 11.1% of REO properties in White neighborhoods had the same problem).
- 23.1% of the REO properties in neighborhoods of color had **missing or out of place gutters**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 5.5 times as likely as REO properties in White neighborhoods to have a **small amount of mold**. (61.5% of REO properties in neighborhoods of color had a small amount of mold, while only 11.1% of REO properties in White neighborhoods had the same problem).
- 76.9% of REO properties in neighborhoods of color had **exposed or tampered-with utilities**, while none of the REO properties in White neighborhoods had the same problem.

## 15. Denver, Colorado

In Denver, CO, Complainants evaluated 44 Bank of America REO properties, 3 of which were located in predominantly African-American neighborhoods, 21 of which were located in predominantly Latino neighborhoods, 3 of which were located in predominantly non-White neighborhoods, and 17 of which were in predominantly White neighborhoods.

**In Denver, CO, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 23.5% of REO properties in White neighborhoods had **fewer than 5 maintenance or marketing deficiencies**, while none of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- REO properties in neighborhoods of color were 1.3 times as likely as REO properties in White neighborhoods to have **5 or more deficiencies**. (100.0% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 76.5% of REO properties in White neighborhoods had more than 5 deficiencies).
- REO properties in neighborhoods of color were 3.5 times as likely as REO properties in White neighborhoods to have **10 or more deficiencies**. (40.7% of REO properties in neighborhoods of color had more than 10 deficiencies while only 11.8% of REO properties in White neighborhoods had more than 10 deficiencies).

**In Denver, CO, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 6.9 times as likely as REO properties in White neighborhoods to have **accumulated mail**. (40.7% of REO properties in neighborhoods of color had accumulated mail, while only 5.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times as likely as REO properties in White neighborhoods to have **overgrown grass and accumulated leaves**. (74.1% of REO properties in neighborhoods of color had overgrown grass and accumulated leaves, while only 41.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times as likely as REO properties in White neighborhoods to have **miscellaneous curb appeal problems** such as leaving sidewalks unshoveled during snowy months and unsecured and poorly maintained swimming pools. (74.1% of REO properties in neighborhoods of color had miscellaneous curb appeal problems, while only 41.2% of REO properties in White neighborhoods had the same problems).
- REO properties in neighborhoods of color were 9.4 times as likely as REO properties in White neighborhoods to have **unsecured or broken doors**. (55.6% of REO properties in neighborhoods of color had unsecured or broken doors, while only 5.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.7 times as likely as REO properties in White neighborhoods to have **broken or boarded windows**. (48.2% of REO properties in neighborhoods of color had broken or boarded windows, while only 17.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times as likely as REO properties in White neighborhoods to have a **damaged fence**. (63.0% of REO properties in

neighborhoods of color had damaged fences, while only 41.2% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.2 times as likely as REO properties in White neighborhoods to have **miscellaneous structural problems** such as ripped screens on windows and dilapidated sheds and detached garages. (25.9% of REO properties in neighborhoods of color had miscellaneous structural problems, while only 12% of REO properties in White neighborhoods had the same problems).
- REO properties in neighborhoods of color were 4.1 times as likely as REO properties in White neighborhoods to have **peeling paint**. (48% of properties in neighborhoods of color had peeling paint, while only 11.8% of properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 5.6 times as likely as REO properties in White neighborhoods to have **damaged siding**. (33.3% of REO properties in neighborhoods of color had damaged siding, while only 5.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.5 times as likely as REO properties in White neighborhoods to have **broken or hanging gutters**. (29.6% of REO properties in neighborhoods of color had broken or hanging gutters, while only 11.8% of REO properties in White neighborhoods had the same problem).
- 11.1% of REO properties in neighborhoods of color had **water damage**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.8 times as likely as REO properties in White neighborhoods to have **exposed or tampered-with utilities**. (22.2% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 5.9% of REO properties in White neighborhoods had the same problem).

## 16. Las Vegas, Nevada

In Las Vegas, NV, Complainants evaluated 15 Bank of America REO properties, 7 of which were located in predominantly Latino neighborhoods, 1 of which was located in a predominantly non-White neighborhood, and 7 of which were located in predominantly White neighborhoods.

**In Las Vegas, NV, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 5.7 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**.

(71.4% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 12.5% of REO properties in neighborhoods of color had fewer than 5 deficiencies).

- REO properties in neighborhoods of color were 5.7 times as likely as REO properties in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (87.5% of REO properties in neighborhoods of color had 5 or more maintenance and marketing deficiencies, while only 28.6% of REO properties in White neighborhoods had 5 or more deficiencies).
- 25.0% of the REO properties in neighborhoods of color had **10 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had more than 10 deficiencies.

**In Las Vegas, NV, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 2.0 times as likely as REO properties in White neighborhoods to have **substantial amounts of trash**. (87.5% of REO properties in neighborhoods of color had substantial trash, while only 42.9% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.3 times as likely as REO properties in White neighborhoods to have **overgrown grass and accumulated leaves**. (37.5% of REO properties neighborhoods of color had overgrown grass and accumulated leaves while only 28.6% in White neighborhoods had the same problem).
- 12.5% of properties in neighborhoods of color had **at least 10% to 50% of the property covered in dead grass**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.7 times as likely as REO properties in White neighborhoods to have **50% or more of the property covered in dead grass**. (25.0% of REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 14.3% of REO properties in White neighborhoods had the same problem).
- 12.5% of REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 12.5% of REO properties in neighborhoods of color had **unsecured or broken doors**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 4.4 times as likely as REO properties in White neighborhoods to have **broken or boarded windows**. (62.5% of REO properties

in neighborhoods of color had broken or boarded windows, while only 14.3% of REO properties in White neighborhoods had the same problem).

- 12.5% of REO properties in neighborhoods of color had a **damaged roof**, while none of the REO properties in White neighborhoods had the same problem.
- 50.0% of REO properties in neighborhoods of color had a **damaged fence**, while none of the REO properties in White neighborhoods had the same problem.
- 25.0% of REO properties in neighborhoods of color had **holes in the structure of the home**, while none of the REO properties in White neighborhoods had the same problem.
- 12.5% of REO properties in neighborhoods of color had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.
- 25.0% of REO properties in neighborhoods of color had **graffiti** while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 4.4 times as likely as properties in White neighborhoods to have **peeling paint**. (62.5% of REO properties in neighborhoods of color had peeling paint, while only 14.3% of REO properties in White neighborhoods had the same problem).
- 50.0% of REO properties in neighborhoods of color had **damaged siding**, while none of the REO properties in White neighborhoods had the same problem.
- 12.5% of REO properties in neighborhoods of color had **obstructed gutters**, while none of the REO properties in White neighborhoods had the same problem.

## 17. Tucson, Arizona

In Tucson, AZ, Complainants evaluated 18 Bank of America REO properties, 15 of which were located in predominantly Latino neighborhoods and 3 of which were located in predominantly White neighborhoods. As noted above, in Tucson, Complainants found that Bank of America engaged in poor maintenance and marketing of REO properties in neighborhoods of color. This poor maintenance and marketing in neighborhoods of color was consistent with the poor maintenance and marketing of Bank of America's REO properties in neighborhoods of color throughout the nation that Complainants found in their investigation. Furthermore, Bank of America's REO properties in neighborhoods of color in Tucson had a higher average number of maintenance or marketing deficiencies than REO properties in White neighborhoods that Complainants evaluated nationally.

**In Tucson, AZ, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- 13.3% of REO properties in Latino neighborhoods had **accumulated mail**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in Latino neighborhoods were 1.4 times as likely as REO properties in White neighborhoods to have **50% or more of the property covered in dead grass**. (46.7% of REO properties in Latino neighborhoods had 50% or more of the property covered in dead grass, while only 33.3% of REO properties in White neighborhoods had the same problem).
- 13.3% of REO properties in Latino neighborhoods had **at least 10% to 50% of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 53.3% of REO properties in Latino neighborhoods had **unsecured or broken doors**, while none of the REO properties in White neighborhoods had the same problem.
- 13.3% of REO properties in Latino neighborhoods had a **damaged roof**, while none of the REO properties in White neighborhoods had the same problem.
- 40.0% of REO properties in Latino neighborhoods had **holes in the structure of the home**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in Latino neighborhoods were 2.2 times as likely as REO properties in White neighborhoods to have **trespassing or warning signs**. (73.3% of REO properties in Latino neighborhoods had **trespassing or warning signs**, while only 33.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in Latino neighborhoods were 2.8 times more likely than REO properties in White neighborhoods to **have no professional “for sale” sign marketing the home**. (93.3% of REO properties in Latino neighborhoods had no professional “for sale” sign marketing the home, while only 33.3% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in White neighborhoods were 9.6 times more likely than REO properties in Latino neighborhoods to have a “for sale” sign.

## **18. Philadelphia, Pennsylvania**

In Philadelphia, PA, Complainants’ original complaint and amended complaints had addressed 27 Bank of America REO properties. Complainants have now investigated 53 Bank of America REO properties, 28 of which were located in predominantly African-American neighborhoods, 12 of which were located in predominantly non-White neighborhoods, and 13 of which were located in predominantly White neighborhoods.

**In Philadelphia, PA, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 6.9 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (69.2% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 10.0% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 2.9 times more likely than properties in White neighborhoods to have **5 or more maintenance or marketing deficiencies**. (90.0% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 30.8% of properties in White neighborhoods had more than 5 deficiencies).
- REO properties in neighborhoods of color were 3.6 times as likely as properties in white neighborhoods to have **10 or more maintenance or marketing deficiencies**. (27.5% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 7.7% of REO properties in White neighborhoods had 10 or more deficiencies).

**In Philadelphia, PA, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 2.5 times as likely as REO properties in White neighborhoods to have **substantial amounts of trash**. (57.5% of REO properties in neighborhoods of color had substantial trash, while only 23.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.3 times as likely as REO properties in White neighborhoods to have **accumulated mail**. (50.0% of REO properties in neighborhoods of color had accumulated mail while only 15.4% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.2 times as likely as REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (37.5% of REO properties in neighborhoods of color had overgrown or dead shrubbery while only 30.8% of REO properties in White neighborhoods had the same problem).
- 12.5% of REO properties in neighborhoods of color had **50% or more of the property covered in dead grass**, while none of the REO properties in White neighborhoods had the same problem.
- 22.5% of REO properties in neighborhoods of color had **50% or more of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.9 times as likely as REO properties in White neighborhoods to have **unsecured or broken doors**. (30.0% of REO properties in neighborhoods of color had unsecured or broken doors while only 7.7% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.5 times as likely as REO properties in White neighborhoods to have **broken or boarded windows**. (57.5% of REO properties in neighborhoods of color had broken or boarded windows while only 23.1% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times as likely as REO properties in White neighborhoods to have a **damaged roof**. (12.5% of the REO properties in neighborhoods of color had a damaged roof, while only 7.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times as likely as REO properties in White neighborhoods to have a **damaged fence**. (27.5% of REO properties in neighborhoods of color had a damaged fence, while only 15.4% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.2 times as likely as REO properties in White neighborhoods to have **holes in the structure of the home**. (32.5% of REO properties in neighborhoods of color had holes in the structure of the home, while only 7.7% none of the REO properties in White neighborhoods had the same problem).
- 30.0% of REO properties in neighborhoods of color had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.
- 17.5% of REO properties in neighborhoods of color had **trespassing or warning signs**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.6 times as likely as REO properties in White neighborhoods to be **marketed as distressed**. (12.5% of the REO properties in neighborhoods of color were marketed as distressed, while only 7.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.1 times as likely as REO properties in White neighborhoods to **have no professional “for sale” sign marketing the home**. (72.5% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 23.1% of REO properties in White neighborhoods had the same problem). Put differently, REO properties in White neighborhoods were also 2.8 times as likely as REO properties in neighborhoods of color to have a “for sale” sign.
- REO properties in neighborhoods of color were 2.0 times as likely as REO properties in White neighborhoods to have **peeling paint**. (62.5% of REO properties in neighborhoods of color had peeling paint while only 30.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times as likely as REO properties in White neighborhoods to have **damaged siding**. (35.0% of the REO properties in

neighborhoods of color had damaged siding, while only 23.1% of the REO properties in White neighborhoods had the same problem).

- 7.5% of the REO properties in neighborhoods of color had **missing or out of place gutters**, while none of the REO properties in White neighborhoods had the same problem.

## 19. Toledo, Ohio

In Toledo, OH, Complainants' original complaint and amended complaints had addressed 22 Bank of America REO properties. Complainants have now investigated 40 Bank of America REO properties, 14 of which were located in predominantly African-American neighborhoods, 2 of which were located in predominantly non-White neighborhoods, and 24 of which were in predominantly White neighborhoods.

**In Toledo, OH, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 4.6 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance and marketing deficiencies**. (29.2% of REO properties in White neighborhoods had fewer than 5 maintenance and marketing deficiencies, while only 6.3% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.4 times as likely as REO properties in neighborhoods of color to have **5 or more maintenance and marketing deficiencies** (98.3% of REO properties in neighborhoods of color had 5 or more deficiencies while only 70.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 6.0 times as likely as REO properties in neighborhoods of color to have **10 or more maintenance and marketing deficiencies** (50.0% of REO properties in neighborhoods of color had 10 or more deficiencies while only 8.3% of REO properties in White neighborhoods had the same problem)

**In Toledo, OH, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 4.1 times as likely as REO properties in White neighborhoods to have **substantial amounts of trash**. (68.8% of REO properties in neighborhoods of color had substantial trash while only 16.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.4 times as likely as REO properties in White neighborhoods to have **overgrown grass or accumulated leaves**. (68.8% of REO properties in neighborhoods of color had overgrown grass or accumulated leaves while only 50.0% of REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.6 times as likely as REO properties in neighborhoods of color to have **overgrown or dead shrubbery**. (75.0% of REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 45.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely to have **at least 10% to 50% of the property covered in invasive plants** (75.0% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants while only 45.8% of REO properties in White neighborhoods had the same deficiency).
- REO properties in neighborhoods of color were 4.5 times more likely to have **more than 50% of the property covered in invasive plants**. (18.8% of REO properties in neighborhoods of color had more than 50% of the property covered in invasive plants, while only 4.2% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.0 times more likely to have a **broken mailbox**. (12.5% of REO properties in neighborhoods of color had a broken mailbox, while only 4.2% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 7.5 times more likely to have **unsecured or broken doors**. (31.3% of REO properties in neighborhoods of color had unsecured or broken doors, while only 4.2% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.0 times more likely to have **damaged steps or handrails**. (50.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 16.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.2 times as likely as REO properties in White neighborhoods to have **broken or boarded windows**. (50.0% of REO properties in neighborhoods of color had broken or boarded windows while only 41.7% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.5 times as likely as REO properties in White neighborhoods to have a **damaged roof**. (18.8% of the REO properties in neighborhoods of color had a damaged roof, while only 4.2% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times as likely as REO properties in White neighborhoods to have **holes in the structure of the home**. (18.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 12.5% of the REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.5 times as likely as REO properties in White neighborhoods to have **damaged siding**. (43.8% of the REO properties in neighborhoods of color had damaged siding, while only 29.2% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3 times as likely as REO properties in White neighborhoods to have **missing or out of place gutters**. (37.5% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times as likely as REO properties in White neighborhoods to have **broken or hanging gutters**. (18.8% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 8.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.5 times as likely as REO properties in White neighborhoods to have **a small amount of mold**. (31.3% of the REO properties in neighborhoods of color had a small amount of mold, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2 times as likely as REO properties in White neighborhoods to have **exposed or tampered-with utilities**. (25.0% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 12.5% of REO properties in White neighborhoods had the same deficiency).

## 20. Baltimore, Maryland

In Baltimore, MD, Complainants' original complaint and amended complaints had addressed 29 Bank of America REO properties. Complainants have now investigated 44 Bank of America REO properties, 30 of which were in predominantly African-American neighborhoods, 1 of which was in a predominantly Non-White neighborhood, and 138 of which were located in predominantly White neighborhoods.

**In Baltimore, MD, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 2.4 times as likely as REO properties in neighborhoods of color to have **fewer than 5 maintenance and marketing deficiencies**. (23.1% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 9.7% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.2 times as likely as REO properties in neighborhoods of color to have **5 or more maintenance and marketing deficiencies**. (90.3% of REO properties in neighborhoods of color had 5 or more maintenance and

marketing deficiencies, while only 76.9% of REO properties in White neighborhoods had 5 or more deficiencies).

- 41.9% of REO properties in neighborhoods of color had **10 or more maintenance and marketing deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In Baltimore, MD, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities include:**

- REO properties in neighborhoods of color were 1.6 times as likely as REO properties in White neighborhoods to have **substantial amounts of trash**. (74.2% of REO properties in neighborhoods of color had substantial trash while only 46.2% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times as likely as REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (45.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 30.8% of the REO properties in White neighborhoods had the same problem).
- 51.6% of REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.6 times as likely as REO properties in White neighborhoods to have **unsecured or broken doors**. (48.4% of REO properties in neighborhoods of color had unsecured or broken doors while only 30.8% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.3 times as likely as REO properties in White neighborhoods to have **damaged steps or handrails**. (29.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 23.1% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as properties in White neighborhoods to have **broken or boarded windows**. (64.5% of REO properties neighborhoods of color had broken or boarded windows while only 30.8% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as properties in White neighborhoods to have a **damaged roof**. (16.1% of the REO properties in neighborhoods of color had a damaged roof, while only 7.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times as likely as REO properties in White neighborhoods to have a **damaged fence**. (32.3% of REO properties in

neighborhoods of color had a damaged fence while only 15.4% of properties in neighborhoods of color had the same problem).

- REO properties in neighborhoods of color were 2.5 times as likely as REO properties in White neighborhoods to have **wood rot**. (19.4% of the REO properties in neighborhoods of color had wood rot, while only 7.7% of the REO properties in White neighborhoods had the same problem).
- 9.7% of the REO properties in neighborhoods of color were **marketed as distressed**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.4 times as likely as REO properties in White neighborhoods to have **peeling paint**. (54.8% of REO properties in neighborhoods of color had peeling paint while only 38.5% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.5 times as likely as REO properties in White neighborhoods to have **damaged siding**. (19.4% of the REO properties in neighborhoods of color had damaged siding, while only 7.7% of the REO properties in White neighborhoods had the same problem).
- 16.1% of REO properties in neighborhoods of color had **broken or hanging gutters** while none of the REO properties in White neighborhoods had the same problem.
- 12.9% of REO properties in neighborhoods of color had **water damage** while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.7 times as likely as REO properties in White neighborhoods to have **a small amount of mold**. (25.8% of the REO properties in neighborhoods of color had a small amount of mold, while only 15.4% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times as likely as REO properties in White neighborhoods to have **exposed or tampered-with utilities**. (22.6% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 15.4% of the REO properties in White neighborhoods had the same problem).

## 21. Kansas City, Missouri and Kansas City, Kansas

In the Kansas City, MO/KS metropolitan area, Complainants evaluated 14 Bank of America REO properties; 6 of which were in predominantly African-American neighborhoods, 2 of which were in predominantly non-White neighborhoods, and 6 of which were located in predominantly White neighborhoods.

**In the Kansas City, MO/KS metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 6.7 times more likely than REO properties in neighborhoods of color to have **fewer than 5 marketing or maintenance deficiencies**. (83.3% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 12.5% of REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 5.2 times more likely than REO properties in White neighborhoods to have **5 or more marketing or maintenance deficiencies**. (87.5% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 16.7% of the REO properties in White neighborhoods had 5 or more deficiencies).
- 50.0% of REO properties in neighborhoods of color had **10 or more marketing or maintenance deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In the Kansas City metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 5.2 times more likely than REO properties in White neighborhoods to have **trash or debris on the premises**. (87.5% of REO properties in neighborhoods of color had trash or debris while only 16.7% of REO properties in White neighborhoods had the same problem).
- 62.5% of REO properties in neighborhoods of color had **overgrown grass or accumulated leaves**, while none of the REO properties in White neighborhoods had the same issue.
- REO properties in neighborhoods of color were 1.9 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery** at the home (62.5% of REO properties in neighborhoods of color had overgrown or dead shrubbery while only 33.33% of REO properties in White neighborhoods had the same problem).
- 37.5% of REO properties in neighborhoods of color had **at least 10% and 50% of the property covered in invasive plants** while none of the REO properties in White neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had **unsecured, broken, or boarded doors** while none of the REO properties in White neighborhoods had the same issue.

- 25.0% of the REO properties in neighborhoods of color had **damaged steps or handrails** while not a single REO property in a White neighborhood had the same deficiency.
- 37.5% of the REO properties in neighborhoods of color had **broken or boarded windows** while none of the REO properties in White neighborhoods had the same deficiency.
- REO properties in neighborhoods of color were 3.0 times more likely than REO properties in White neighborhoods to have a **damaged fence**. (50.0% of REO properties in neighborhoods of color had a damaged fence while only 16.7% of properties in White neighborhoods had the same problem).
- 50.0% of REO properties in neighborhoods of color had **holes in the structure of the home** while none of the REO properties in White neighborhoods had the same problem.
- 37.5% of REO properties in neighborhoods of color had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.9 times more likely than REO properties in White neighborhoods to have **peeling paint**. (62.5% of REO properties in neighborhoods of color had peeling paint while only 33.3% of REO properties in White neighborhoods had the same problem).
- 50.0% of the REO properties in neighborhoods of color had **damaged siding** while not a single REO property in a White neighborhood had the same problem.
- 37.5% of REO properties in neighborhoods of color had **broken or hanging gutters** while only 16.7% of the REO properties in White neighborhoods had the same issue.

## 22. New Orleans, Louisiana

In the New Orleans, LA metropolitan area, Complainants evaluated 26 Bank of America REO properties; 16 of which were in predominantly African-American neighborhoods, 2 of which were in predominantly non-White neighborhoods, and 8 of which were located in predominantly White neighborhoods.

**In the New Orleans metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 25.0% of REO properties in White neighborhoods had **fewer than 5 deficiencies**, while no REO property in a neighborhood of color had fewer than 5 deficiencies.
- 61.1% of REO properties in neighborhoods of color had **10 or more deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In the New Orleans metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 6.7 times more likely than REO properties in White neighborhoods to have **trash or debris on the premises**. (83.3% of REO properties in neighborhoods of color had trash or debris while only 12.5% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.0 times more likely than REO properties in White neighborhoods to have **accumulated mail** left at the home (50.0% of REO properties in neighborhoods of color had accumulated mail while only 25.0% of REO properties in White neighborhoods had the same issue).
- 27.8% of REO properties in neighborhoods of color had **overgrown grass or accumulated leaves**, while none of the REO properties in White neighborhoods had the same issue.
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery** (55.6% of REO properties in neighborhoods of color had overgrown or dead shrubbery while only 25.0% of REO properties in White neighborhoods had the same issue).
- 11.1% of REO properties in neighborhoods of color had **50% or more of the property covered in dead grass** while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.9 times more likely than REO properties in White neighborhoods to have **at least 10% and 50% of the REO property covered in invasive plants** (72.2% of REO properties in neighborhoods of color had at least 10% and 50% of the home covered in invasive plants, while only 25.0% of REO properties in White neighborhoods had the same issue.)
- 11.1% of REO properties in neighborhoods of color had **50% or more of the property covered in invasive plants** while none of the REO properties in White neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color had **damaged steps or handrails** while none of the REO properties in White neighborhoods had the same issue.
- REO properties in neighborhoods of color were 6.2 times more likely to have a **damaged fence** on the premises of the REO compared to REO properties in White neighborhoods (77.8% of the REO properties in neighborhoods of color had a **damaged fence** while only 12.5% of the REO properties in White neighborhoods had the same deficiency).

- REO properties in neighborhoods of color were 2.0 times more likely than REO properties in White neighborhoods to have **holes in the structure of the home**. (50.0% of REO properties in neighborhoods of color had a hole or holes while only 25.0% of properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to **have no professional “for sale” sign marketing the home** (66.7% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home while only 37.5% of REO properties in White neighborhoods had the same problem).
- 11.1% of the REO properties in neighborhoods of color had **graffiti** on the structure of the home while only not a single REO property in a White neighborhood had the same problem.
- 11.1% of REO properties in neighborhoods of color had **missing or out of place gutters** while not a single REO properties in a White neighborhood had the same issue.
- 38.9% of REO properties in neighborhoods of color had **exposed or tampered-with utilities** while none of the REO properties in White neighborhoods had the same problem.

### 23. Vallejo, California

In the Vallejo, CA metropolitan area, Complainants evaluated 20 Bank of America REO properties; 1 of which was in a predominantly Hispanic neighborhood, 12 of which were in predominantly non-White neighborhoods, and 7 of which were located in predominantly White neighborhoods.

**In the Vallejo metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 1.9 times more likely than REO properties in neighborhoods of color to have **fewer than 5 marketing or maintenance deficiencies**. (57.1% of REO properties in White neighborhoods had fewer than 5 deficiencies, while only 30.8% REO property in a neighborhood of color had fewer than 5 deficiencies).
- 15.4% of REO properties in neighborhoods of color had **10 or more deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In the Vallejo metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 1.9 times more likely than REO properties in White neighborhoods to have **trash or debris on the premises**. (53.9% of REO properties in neighborhoods of color had trash or debris while only 28.6% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely than REO properties in White neighborhoods to have **accumulated mail** left at the home (23.1% of REO properties in neighborhoods of color had accumulated mail while only 14.3% of REO properties in White neighborhoods had the same issue).
- 15.4% of REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in dead grass** while none of the REO properties in White neighborhoods had the same problem.
- 23.1% of REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in invasive plants** while none of the REO properties in White neighborhoods had the same problem.
- 23.1% of the REO properties in neighborhoods of color had **unsecured, broken, or boarded doors** while none of the REO properties in White neighborhoods had the same issue.
- 30.8% of the REO properties in neighborhoods of color had **broken or boarded windows** while none of the REO properties in White neighborhoods had the same deficiency.
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have a **damaged fence**. (30.8% of REO properties in neighborhoods of color had a damaged fence while only 14.3% of properties in White neighborhoods had the same problem).
- 23.1% of REO properties in neighborhoods of color were **marketed as distressed** while none of the REO properties in White neighborhoods were marketed in the same fashion.
- REO properties in neighborhoods of color were 3.0 times more likely than REO properties in White neighborhoods to **have no professional “for sale” sign marketing the home** (84.6% of REO properties in neighborhoods of color had no professional “for sale” sign marketing the home while only 28.6% of REO properties in White neighborhoods had the same problem).

## 24. Cleveland, Ohio

In the Cleveland, OH metropolitan area, Complainants evaluated 19 Bank of America REO properties; 11 of which were in predominantly African American neighborhoods and 8 of which were located in predominantly White neighborhoods.

**In the Cleveland metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 12.5% of REO properties in White neighborhoods had **fewer than 5 maintenance or marketing deficiencies**, while no REO property in a neighborhood of color had fewer than 5 deficiencies.
- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **10 or more marketing or maintenance deficiencies**. (45.5% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 25.0% of the REO properties in White neighborhoods had 10 or more deficiencies).

**In the Cleveland metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 3.6 times more likely than REO properties in White neighborhoods to have **trash or debris on the premises**. (45.5% of REO properties in neighborhoods of color had trash or debris while only 12.5% of REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.9 times more likely than REO properties in White neighborhoods to have **accumulated mail** left at the home (36.4% of REO properties in neighborhoods of color had accumulated mail while only 12.5% of REO properties in White neighborhoods had the same issue).
- 36.4% of REO properties in neighborhoods of color had **overgrown grass or accumulated leaves** while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 5.1 times more likely than REO properties in White neighborhoods to have **at least 10% to 50% of the property covered in invasive plants** (63.6% of REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants while only 12.5% of REO properties in White neighborhoods had the same issue).
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have **damaged steps or handrails** (27.3% of REO properties in neighborhoods of color had damaged steps or handrails while only 12.5% of properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have **broken or boarded windows** (81.8% of REO properties in neighborhoods of color had broken or boarded windows while only 37.5% of properties in White neighborhoods had the same problem).

- 54.6% of the REO properties in neighborhoods of color had a **damaged fence** while none of the REO properties in White neighborhoods had the same deficiency.
- REO properties in neighborhoods of color were 3.6 times more likely than REO properties in White neighborhoods to have **holes in the structure of the home** (45.5% of REO properties in neighborhoods of color had holes in the structure of the home while only 12.5% of properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have **wood rot** (27.3% of REO properties in neighborhoods of color had wood rot while only 12.5% of properties in White neighborhoods had the same issue).
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have **exposed or tampered-with utilities** (27.3% of REO properties in neighborhoods of color had exposed or tampered-with utilities while only 12.5% of properties in White neighborhoods had the same issue).

## 25. Columbus, Ohio

In the Columbus, OH metropolitan area, Complainants evaluated 40 Bank of America REO properties, 18 of which were in predominantly African-American neighborhoods, 2 of which were in predominantly non-White neighborhoods, and 20 of which were located in predominantly White neighborhoods.

**In the Columbus, OH metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems.**

**Complainants found that:**

- REO properties in White neighborhoods were 7 times more likely than REO properties in neighborhoods of color to have **fewer than 5 maintenance or marketing deficiencies**. (35.0% of REO properties in White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.0% of the REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.5 times more likely than REO properties in White neighborhoods to have **5 or more marketing or maintenance deficiencies**. (95.0% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 65.0% of the REO properties in White neighborhoods had 5 or more deficiencies).
- 70.0% of the REO properties in neighborhoods of color had **10 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

- 40.0% of the REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.

**In the Columbus metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 1.5 times more likely than REO properties in White neighborhoods to have **substantial amounts of trash** on the premises. (45.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 30.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely than REO properties in White neighborhoods to have **accumulated mail**. (55.0% of the REO properties in neighborhoods of color had accumulated mail, while only 35.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely than REO properties in White neighborhoods to have **overgrown grass or accumulated leaves**. (55.0% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 35.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (80.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 45.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2 times more likely than REO properties in White neighborhoods to have **at least 10% to 50% of the property covered in dead grass**. (20.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 10.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.5 times more likely than REO properties in White neighborhoods to have **50% or more of the property covered in invasive plants**. (50.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 20.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4 times more likely than REO properties in White neighborhoods to have **unsecured or broken doors**. (40.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 10.0% of the REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 9 times more likely than REO properties in White neighborhoods to have **damaged steps or handrails**. (45.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 5.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4 times more likely than REO properties in White neighborhoods to have **broken or boarded windows**. (60.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 15.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.1 times more likely than REO properties in White neighborhoods to have a **damaged fence**. (75.0% of the REO properties in neighborhoods of color had a damaged fence, while only 35.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 7 times more likely than REO properties in White neighborhoods to have **holes in the structure of the home**. (35.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 5.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 7 times more likely than REO properties in White neighborhoods to have **wood rot**. (35.0% of the REO properties in neighborhoods of color had wood rot, while only 5.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.9 times more likely than REO properties in White neighborhoods to have **peeling or chipped paint**. (65.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 35.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely than REO properties in White neighborhoods to have **damaged siding**. (40.0% of the REO properties in neighborhoods of color had damaged siding, while only 25.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 11 times more likely than REO properties in White neighborhoods to have **missing or out of place gutters**. (55.0% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 5.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 6 times more likely than REO properties in White neighborhoods to have **broken or hanging gutters**. (30.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 5.0% of the REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.3 times more likely than REO properties in White neighborhoods to have **obstructed gutters**. (35.0% of the REO properties in neighborhoods of color had obstructed gutters, while only 15.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times more likely than REO properties in White neighborhoods to have **a small amount of mold**. (45.0% of the REO properties in neighborhoods of color had a small amount of mold, while only 20.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.5 times more likely than REO properties in White neighborhoods to have **exposed or tampered-with utilities**. (45.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 10.0% of the REO properties in White neighborhoods had the same problem).

## 26. Suburban Detroit, Michigan

In the Suburban Detroit, MI metropolitan area, Complainants investigated 26 Bank of America REO properties, 8 of which were in predominantly African-American neighborhoods, 4 of which were in predominantly non-White neighborhoods, and 14 of which were located in predominantly White neighborhoods.

**In the Suburban Detroit, MI metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 50.0% of REO properties in White neighborhoods had **fewer than 5 maintenance or marketing deficiencies**, while none of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- REO properties in neighborhoods of color were 2 times more likely than REO properties in White neighborhoods to have **5 or more marketing or maintenance deficiencies**. (100.0% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 50.0% of the REO properties in White neighborhoods had 5 or more deficiencies).
- REO properties in neighborhoods of color were 3.5 times more likely than REO properties in White neighborhoods to have **10 or more marketing or maintenance deficiencies**. (50.0% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 14.3% of the REO properties in White neighborhoods had 10 or more deficiencies).

**In the Suburban Detroit, MI metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **substantial amounts of trash** on the premises. (91.7% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 50.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely than REO properties in White neighborhoods to have **accumulated mail**. (33.3% of the REO properties in neighborhoods of color had accumulated mail, while only 21.4% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.6 times more likely than REO properties in White neighborhoods to have **overgrown grass or accumulated leaves**. (91.7% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 35.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.7 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (75.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 42.9% of the REO properties in White neighborhoods had the same problem).
- 25.0% of the REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had **a broken mailbox**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.0 times more likely than REO properties in White neighborhoods to have **unsecured or broken doors**. (58.3% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 28.6% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.7 times more likely than REO properties in White neighborhoods to have **damaged steps or handrails**. (33.3% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 7.1% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 3.1 times more likely than REO properties in White neighborhoods to have **broken or boarded windows**. (66.7% of the REO properties in neighborhoods of color had broken or boarded windows, while only 21.4% of the REO properties in White neighborhoods had the same problem).

- 16.7% of the REO properties in neighborhoods of color had a **damaged roof**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.3 times more likely than REO properties in White neighborhoods to have a **damaged fence**. (33.3% of the REO properties in neighborhoods of color had a damaged fence, while only 14.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.9 times more likely than REO properties in White neighborhoods to have **holes in the structure of the home**. (41.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 14.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.4 times more likely than REO properties in White neighborhoods to have **trespassing or warning signs**. (16.7% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 7.1% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times more likely than REO properties in White neighborhoods to have **peeling paint**. (33.3% of the REO properties in neighborhoods of color had peeling paint, while only 14.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **damaged siding**. (25.0% of the REO properties in neighborhoods of color had damaged siding, while only 14.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.3 times more likely than REO properties in White neighborhoods to have **missing or out of place gutters**. (66.7% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 50.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **obstructed gutters**. (25.0% of the REO properties in neighborhoods of color had obstructed gutters, while only 14.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 5.9 times more likely than REO properties in White neighborhoods to have **exposed or tampered-with utilities**. (41.7% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 7.1% of the REO properties in White neighborhoods had the same problem).

## 27. Gary, Indiana

In the Gary, IN metropolitan area, Complainants investigated 21 Bank of America REO properties, 13 of which were in predominantly African-American neighborhoods and 8 of which were located in predominantly White neighborhoods.

**In the Gary, IN metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- 87.5% of REO properties in White neighborhoods had **fewer than 5 maintenance or marketing deficiencies**, while none of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- REO properties in neighborhoods of color were 8 times more likely than REO properties in White neighborhoods to have **5 or more marketing or maintenance deficiencies**. (100.0% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 12.5% of the REO properties in White neighborhoods had 5 or more deficiencies).
- 79.6% of REO properties in neighborhoods of color had **10 or more marketing or maintenance deficiencies**, while none of the REO properties in White neighborhoods had 10 or more deficiencies.
- 15.4% of REO properties in neighborhoods of color had **15 or more marketing or maintenance deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In the Gary, IN metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 5.5 times more likely than REO properties in White neighborhoods to have **substantial amounts of trash** on the premises. (69.2% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.9 times more likely than REO properties in White neighborhoods to have **overgrown grass or accumulated leaves**. (46.2% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 25.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.3 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (84.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 37.5% of the REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 3.0 times more likely than REO properties in White neighborhoods to have **at least 10% to 50% of the property covered in dead grass**. (38.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.5 times more likely than REO properties in White neighborhoods to have **50% or more of the property covered in invasive plants**. (30.8% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- 15.4% of the REO properties in neighborhoods of color had **unsecured or broken doors**, while none of the REO properties in White neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had **damaged steps or handrails**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 3.1 times more likely than REO properties in White neighborhoods to have **broken or boarded windows**. (76.9% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.0% of the REO properties in White neighborhoods had the same problem).
- 53.8% of the REO properties in neighborhoods of color had **a damaged fence**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 5.5 times more likely than REO properties in White neighborhoods to have **holes in the structure of the home**. (69.2% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- 53.9% of the REO properties in neighborhoods of color had **wood rot**, while none of the REO properties in White neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color were **marketed as distressed**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.2 times more likely than REO properties in White neighborhoods to have **no professional “for sale” sign marketing the home**. (76.9% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 62.5% of the REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 2.8 times more likely than REO properties in White neighborhoods to have **peeling or chipped paint**. (69.2% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 25.0% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 4.3 times more likely than REO properties in White neighborhoods to have **damaged siding**. (53.8% of the REO properties in neighborhoods of color had damaged siding, while only 12.5% of the REO properties in White neighborhoods had the same problem).
- 38.5% of the REO properties in neighborhoods of color had **missing or out of place gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 38.5% of the REO properties in neighborhoods of color had **obstructed gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had **a small amount of mold**, while none of the REO properties in White neighborhoods had the same problem.
- 38.5% of the REO properties in neighborhoods of color had **exposed or tampered-with utilities**, while none of the REO properties in White neighborhoods had the same problem.

## 28. Minneapolis, Minnesota

In the Minneapolis, MN metropolitan area, Complainants investigated 19 Bank of America REO properties, 4 of which were in predominantly African-American neighborhoods, 6 of which were in predominantly non-White neighborhoods, and 9 of which were located in predominantly White neighborhoods.

**In the Minneapolis, MN metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 5.6 times more likely than REO properties in neighborhoods of color to have **fewer than 5 marketing or maintenance deficiencies**. (55.6% of REO properties in White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.0% of the REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 2.0 times more likely than REO properties in White neighborhoods to have **5 or more marketing or maintenance deficiencies**. (90.0% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 44.4% of the REO properties in White neighborhoods had 5 or more deficiencies).

- REO properties in neighborhoods of color were 4.5 times more likely than REO properties in White neighborhoods to have **10 or more marketing or maintenance deficiencies**. (50.0% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 11.1% of the REO properties in White neighborhoods had 10 or more deficiencies).

**In the Minneapolis, MN metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 1.5 times more likely than REO properties in White neighborhoods to have **substantial amounts of trash** on the premises. (50.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 33.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 8.1 times more likely than REO properties in White neighborhoods to have **overgrown grass or accumulated leaves**. (90.0% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 11.1% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.7 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (60.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 22.2% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.5 times more likely than REO properties in White neighborhoods to have **unsecured or broken doors**. (50.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 33.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.2 times more likely than REO properties in White neighborhoods to have **damaged steps or handrails**. (40.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 33.3% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 5.4 times more likely than REO properties in White neighborhoods to have **broken or boarded windows**. (60.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 11.1% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.7 times more likely than REO properties in White neighborhoods to have **a damaged fence**. (30.0% of the REO properties in neighborhoods of color had a damaged fence, while only 11.1% of the REO properties in White neighborhoods had the same problem).

- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **trespassing or warning signs**. (20.0% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 11.1% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.6 times more likely than REO properties in White neighborhoods to have **no professional “for sale” sign marketing the home**. (90.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 55.6% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **damaged siding**. (40.0% of the REO properties in neighborhoods of color had damaged siding, while only 22.2% of the REO properties in White neighborhoods had the same problem).
- 40.0% of the REO properties in neighborhoods of color had **missing or out of place gutters**, while none of the REO properties in White neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had **a small amount of mold**, while none of the REO properties in White neighborhoods had the same problem.

## 29. Newark, New Jersey

In the Newark, NJ metropolitan area, Complainants investigated 14 Bank of America REO properties, 11 of which were in predominantly African-American neighborhoods, 1 of which was in a predominantly non-White neighborhood, and 2 of which were located in predominantly White neighborhoods. There are only 2 REOs in White neighborhoods due to the absence of REOs in closer zip codes. The two REOs in White neighborhoods that Complainants could evaluate were in Boonton Township and Clifton. As noted above, in Newark, Complainants found that Bank of America engaged in poor maintenance and marketing of REO properties in neighborhoods of color. This poor maintenance and marketing in neighborhoods of color was consistent with the poor maintenance and marketing of Bank of America’s REO properties in neighborhoods of color throughout the nation that Complainants found in their investigation. Furthermore, Bank of America’s REO properties in neighborhoods of color in Newark had a higher average number of maintenance or marketing deficiencies than REO properties in White neighborhoods that Complainants evaluated nationally.

**In the Newark, NJ metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- Both of the REO properties in White neighborhoods had **fewer than 5 marketing or maintenance deficiencies**, while none of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 100.0% of REO properties in neighborhoods of color had **5 or more marketing or maintenance deficiencies**, while neither of the REO properties in White neighborhoods had 5 or more deficiencies.
- 58.3% of REO properties in neighborhoods of color had **10 or more marketing or maintenance deficiencies**, while neither of the REO properties in White neighborhoods had 10 or more deficiencies.

**In the Newark, NJ metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 1.8 times more likely than REO properties in White neighborhoods to have **substantial amounts of trash** on the premises. (91.7% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 50.0% of the REO properties in White neighborhoods had the same problem).
- 66.7% of the REO properties in neighborhoods of color had **overgrown grass or accumulated leaves**, while neither of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.5 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (75.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 50.0% of the REO properties in White neighborhoods had the same problem).
- 25.0% of the REO properties in neighborhoods of color had **50% or more of the property covered in invasive plants**, while neither of the REO properties in White neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had **unsecured or broken doors**, while neither of the REO properties in White neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had **broken or boarded windows**, while neither of the REO properties in White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had a **damaged fence**, while neither of the REO properties in White neighborhoods had the same problem.

- 25.0% of the REO properties in neighborhoods of color had **holes** in the structure of the home, while neither of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.3 times more likely than REO properties in White neighborhoods to have **peeling paint**. (66.7% REO properties in neighborhoods of color had peeling paint, while only 50% of the REO properties in White neighborhoods had the same problem).
- 33.3% of the REO properties in neighborhoods of color had **damaged siding**, while neither of the REO properties in White neighborhoods had the same problem.
- 58.3% of the REO properties in neighborhoods of color had **missing or out of place gutters**, while neither of the REO properties in White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had **broken or hanging gutters**, while neither of the REO properties in White neighborhoods had the same problem.
- 46.2% of the REO properties in neighborhoods of color had **a small amount of mold**, while neither of the REO properties in White neighborhoods had the same problem.

### 30. Tampa, Florida

In the Tampa, FL metropolitan area, Complainants investigated 35 Bank of America REO properties, 10 of which were in predominantly African-American neighborhoods, 3 of which were in predominantly Latino neighborhoods, 16 of which were in predominantly non-White neighborhoods, and 6 of which were located in predominantly White neighborhoods.

**In the Tampa, FL metropolitan area, Complainants observed significant racial disparities in the number of maintenance and marketing deficiencies or problems. Complainants found that:**

- REO properties in White neighborhoods were 9.8 times more likely than REO properties in neighborhoods of color to have **fewer than 5 marketing or maintenance deficiencies**. (33.3% of REO properties in White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 3.4% of the REO properties in neighborhoods of color had fewer than 5 deficiencies).
- REO properties in neighborhoods of color were 1.5 times more likely than REO properties in White neighborhoods to have **5 or more marketing or maintenance deficiencies**. (96.6% of REO properties in neighborhoods of color had 5 or more deficiencies, while only 66.7% of the REO properties in White neighborhoods had 5 or more deficiencies).

- REO properties in neighborhoods of color were 3.9 times more likely than REO properties in White neighborhoods to have **10 or more marketing or maintenance deficiencies**. (65.5% of REO properties in neighborhoods of color had 10 or more deficiencies, while only 16.7% of the REO properties in White neighborhoods had 10 or more deficiencies).
- 10.3% of the REO properties in neighborhoods of color had **15 or more maintenance or marketing deficiencies**, while none of the REO properties in White neighborhoods had 15 or more deficiencies.

**In the Tampa, FL metropolitan area, Complainants found significant racial disparities in many of the objective factors they measured. Observed disparities included:**

- REO properties in neighborhoods of color were 1.2 times more likely than REO properties in White neighborhoods to have **substantial amounts of trash** on the premises. (58.6% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 50.0% of the REO properties in White neighborhoods had the same problem).
- 10.3% of the REO properties in neighborhoods of color had **accumulated mail**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.2 times more likely than REO properties in White neighborhoods to have **overgrown or dead shrubbery**. (72.4% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 33.3% of the REO properties in White neighborhoods had the same problem).
- 17.2% of the REO properties in neighborhoods of color had **at least 10% to 50% of the property covered in dead grass**, while none of the REO properties in White neighborhoods had the same problem.
- 6.9% of the REO properties in neighborhoods of color had **50% or more of the property covered in invasive plants**, while none of the REO properties in White neighborhoods had the same problem.
- 17.2% of the REO properties in neighborhoods of color had **a broken mailbox**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.7 times more likely than REO properties in White neighborhoods to have **unsecured or broken doors**. (55.2% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 33.3% of the REO properties in White neighborhoods had the same problem).
- 31.0% of the REO properties in neighborhoods of color had **damaged steps or handrails**, while none of the REO properties in White neighborhoods had the same problem.

- REO properties in neighborhoods of color were 3.1 times more likely than REO properties in White neighborhoods to have **broken or boarded windows**. (51.7% of the REO properties in neighborhoods of color had broken or boarded windows, while only 16.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 2.7 times more likely than REO properties in White neighborhoods to have **holes in the structure of the home**. (44.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 16.7% of the REO properties in White neighborhoods had the same problem).
- REO properties in neighborhoods of color were 1.9 times more likely than REO properties in White neighborhoods to have **wood rot**. (31.0% of the REO properties in neighborhoods of color had wood rot, while only 16.7% of the REO properties in White neighborhoods had the same problem).
- 20.7% of the REO properties in neighborhoods of color had **trespassing or warning signs**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.2 times more likely than REO properties in White neighborhoods to have **no professional “for sale” sign marketing the home**. (82.8% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 66.7% of the REO properties in White neighborhoods had the same problem).
- 10.0% of the REO properties in neighborhoods of color had **broken or hanging gutters**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 2.7 times more likely than REO properties in White neighborhoods to have **a small amount of mold**. (44.8% of the REO properties in neighborhoods of color had a small amount of mold, while only 16.7% of the REO properties in White neighborhoods had the same problem).
- 24.1% of the REO properties in neighborhoods of color had **pervasive mold**, while none of the REO properties in White neighborhoods had the same problem.
- REO properties in neighborhoods of color were 1.4 times more likely than REO properties in White neighborhoods to have **exposed or tampered-with utilities**. (44.8% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 33.3% of the REO properties in White neighborhoods had the same problem).

\*\*\*

Since the Complaint was originally filed, NFHA and its partners have investigated an additional 40 properties in Grand Rapids, 46 properties in Atlanta, 15 properties in Dayton, 8 properties in Miami, 21 properties in Dallas, 22 properties in the Washington, DC/Prince George’s County, MD metropolitan area, 32 properties in Orlando, 5 properties in Charleston, 85

properties in the Chicago metropolitan area, 110 properties in Milwaukee, 22 properties in Indianapolis, 35 properties in Memphis, 44 properties in Denver, 15 properties in Las Vegas, 18 properties in Tucson, 53 properties in Philadelphia, 40 properties in Toledo, 44 properties in Baltimore, 14 properties in Kansas City, 26 properties in New Orleans, 20 properties in the Vallejo, CA metropolitan area, 19 properties in Cleveland, 40 properties in Columbus, 26 properties in suburban Detroit, 21 properties in Gary, 19 properties in Minneapolis, 14 properties in Newark, and 35 properties in Tampa. These investigations reveal a continuing pattern of discriminatory maintenance and marketing by Bank of American involving its REO properties.

## **LEGAL CLAIMS**

### **FIRST CAUSE OF ACTION: 42 U.S.C. § 3604(b)**

Section 3604(b) states it is unlawful “[t]o discriminate against any person in the terms, conditions, or privileges of sale . . . of a dwelling, or in the provision of services or facilities in connection therewith, because of race[.]” 42 U.S.C. § 3604(b). HUD’s implementing regulations state “[i]t shall be unlawful, because of race . . ., to impose different terms, conditions or privileges relating to the sale . . . of a dwelling or to deny or limit services or facilities in connection with the sale . . . of a dwelling.” 24 C.F.R. § 100.65(a), and in particular that “prohibited actions under this section include, but are not limited to: . . . *Failing or delaying maintenance or repairs of sale or rental dwellings because of race[.]*” *Id.* § 100.65(b)(2) (emphasis added). By consistently failing to undertake basic maintenance or repairs of REO properties in neighborhoods of color while consistently maintaining and/or repairing REO properties in predominantly White neighborhoods in a superior fashion, Bank of America engages in the “prohibited action” of “failing or delaying maintenance or repairs of sale . . . dwellings because of race,” *id.* § 100.65(b)(2), and thereby discriminates “in the terms, conditions, or privileges of sale . . . dwelling, or in the provision of services or facilities in connection therewith, because of race[.]” 42 U.S.C. § 3604(b).

### **SECOND CAUSE OF ACTION: 42 U.S.C. § 3604(c)**

Section 3604(c) broadly prohibits discrimination in the advertising of dwellings for sale or rent. *See* 42 U.S.C. § 3604(c). HUD’s regulations state it is unlawful to “make, print, or publish” a discriminatory notice, statement or advertisement about a dwelling for sale, including through signs, banners, posters or any other documents. 24 C.F.R. § 100.75(a)-(b). In particular, “[d]iscriminatory notices, statements and advertisements include, but are not limited to” “[s]electing media or locations for advertising the sale . . . of dwellings which deny particular segments of the housing market information about housing opportunities because of race,” *id.* § 100.75(c)(3), and “[r]efusing to publish advertising for the sale . . . of dwellings or requiring different charges or terms for such advertising because of race[.]” *Id.* § 100.75(c)(4). Bank of America’s practice of failing to advertise its REO properties with a “for sale” sign in neighborhoods of color at substantially the same rate as in predominantly White neighborhoods and its related practice of posting signs in neighborhoods of color that convey a message that homes are dangerous, undesirable, or distressed violates § 3604(c) and 24 C.F.R. § 100.75(c) and (d) by selecting advertising locations that deny neighborhoods of color vital information about

opportunities to purchase REO properties, and by refusing to publish advertising or using different terms to advertise REO properties in neighborhoods of color, because of race.

**THIRD CAUSE OF ACTION: 42 U.S.C. § 3604(d)**

Section 3604(d) makes it unlawful “to represent to any person because of race . . . that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.” 42 U.S.C. § 3604(d). HUD’s implementing regulations state that “[i]t shall be unlawful, because of race . . . to provide inaccurate . . . information about the availability of dwellings for sale or rental,” including by “[l]imiting information, by word or conduct, regarding suitably priced dwellings available for inspection, sale or rental, because of race,” or by “[p]roviding . . . inaccurate information regarding the availability of a dwelling for sale . . . to any person . . . because of race[.]” 24 C.F.R. § 100.80(a), (b)(4)-(5). Through a combination of sub-standard maintenance, failing to market homes as “for sale,” and the affirmative marketing of these homes as dangerous, undesirable, or distressed, Bank of America violates § 3604(d) by conveying an inaccurate message to existing homeowners and prospective purchasers in neighborhoods of color that its REO properties in neighborhoods of color are “not available for inspection, [or] sale, . . . when such dwelling[s] [are] in fact so available,” because of the race of the homeowners or purchasers in these neighborhoods of color. 42 U.S.C. § 3604(d). In addition, the same practices drastically limit information or provide inaccurate information about the availability of REO properties because of race in violation of 24 C.F.R. § 100.80(b)(4), and (5).

**FOURTH CAUSE OF ACTION: 42 U.S.C. § 3604(a)**

Section 3604(a) states that it is unlawful to “refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race[.]” 42 U.S.C. § 3604(a). Bank of America’s differential treatment in maintenance and marketing of REO properties violates § 3604(a), as it “refuse[s] . . . to negotiate” or “us[es] different . . . sale . . . standards or procedures . . . or other requirements . . . because of race.” 24 C.F.R. § 100.60(b)(2), (4). Furthermore, these practices “restrict . . . the choices of a person by word or conduct in connection with seeking, negotiating for, buying . . . a dwelling so as to perpetuate, or tend to perpetuate, segregated housing patterns,” by conveying a message to prospective purchasers that REO properties in neighborhoods of color are not available or desirable. 24 C.F.R. § 100.70(a). Specifically, these practices “exaggerat[e] [the] drawbacks” of REO properties, “fail to inform” purchasers of “desirable features of a dwelling or of a neighborhood, neighborhood, or development,” and “discourag[e]” persons “from inspecting [or] purchasing” REO properties “because of the race . . . of persons in a neighborhood, neighborhood, or development.” 24 C.F.R. § 100.70(c)(1)-(2). Finally, in the most severe instances of poor maintenance, Bank of America’s practices can cause REO properties in neighborhoods of color to fall into such disrepair that they cannot be restored and must be demolished, making them completely “unavailable” to purchasers. *See* 24 C.F.R. § 100.70(b).

\* \* \*

These unlawful discriminatory practices discourage purchasers from buying homes in neighborhoods of color and result in foreclosed properties remaining vacant for extended periods

of time, reinforce differences in property values between neighborhoods of color and White neighborhoods, reinforce negative stereotypes about neighborhoods and individuals based on race and national origin, tend to perpetuate and exacerbate racial segregation in the housing market, adversely affect home values and wealth of homeowners in neighborhoods of color, adversely affect the emotional and physical health of residents of neighborhoods of color, especially where the failure to maintain creates conditions ripe for mold, vermin and vandalism, and too often result in investors purchasing homes at below market prices and turning neighborhoods in neighborhoods of color that once had high homeownership rates into investor/rental/absentee landlord neighborhoods.

By engaging in this unlawful conduct, Bank of America has harmed and continues to harm NFHA and its Operating Members, neighborhoods of color, a range of individuals, including existing homeowners in neighborhoods of color, individuals who successfully purchase Bank of America's REO properties, prospective purchasers who are interested in purchasing REO properties, and others.

August 31, 2016

Respectfully Submitted,

/s/ Cyrus Mehri

Cyrus Mehri (D.C. Bar No. 420970)  
Steven A. Skalet (D.C. Bar No. 359804)  
MEHRI & SKALET, PLLC  
1250 Connecticut Avenue, N.W.  
Suite 300  
Washington, DC 2003  
Telephone: (202) 822-5100  
Facsimile: (202) 822-4997  
cmehri@findjustice.com

/s/ Andrew Freeman

Andrew D. Freeman  
Jessica P. Weber (D.C. Bar No. 1021692)  
BROWN GOLDSTEIN & LEVY, LLP  
120 E. Baltimore St.  
Suite 1700  
Baltimore, MD 21202  
Telephone: (410) 962-1030  
Facsimile: (410) 385-0869  
adf@browngold.com

/s/ Morgan Williams

Morgan Williams, Esq.  
NATIONAL FAIR HOUSING ALLIANCE  
1101 Vermont Avenue, N.W., Suite 710  
Washington, DC 20005  
Telephone: (202) 898-1661  
Facsimile: (202) 371-9744

*Attorneys for Complainants*

/s/ Shanna L. Smith

Shanna L. Smith  
President & CEO  
NATIONAL FAIR HOUSING ALLIANCE  
1101 Vermont Avenue, N.W., Suite 710

Washington, DC 20005  
Telephone: (202) 898-1661  
Facsimile: (202) 371-9744  
ssmith@nationalfairhousing.org

/s/ Keenya J. Robertson

Keenya J. Robertson  
President & CEO  
Housing Opportunities for Project for  
Excellence, Inc.  
11501 NW 2nd Avenue  
Miami, FL 33168  
Telephone: 305-651-4673  
Facsimile: 305-759-2440  
Keenya@hopefhc.com

/s/ Gail L. Williams

Gail L. Williams  
Executive Director  
Metro Fair Housing Services, Inc.  
175 Trinity Ave. SW  
Atlanta, GA 30303  
Telephone: 404-524-0000  
Facsimile: 404-524-0005  
gail.williams@metrofairhousing.com

/s/ Jim McCarthy

Jim McCarthy  
President & CEO  
Miami Valley Fair Housing Center, Inc.  
21 East Babbitt Street  
Dayton, OH 45405-4903  
Telephone: (937) 223-6035  
Facsimile: (937) 223-6279  
jim.mccarthy@mvfairhousing.com  
President & CEO  
Central Ohio Fair Housing Association  
175 South 3<sup>rd</sup> Street, Suite 580  
Columbus, OH 43215  
Telephone: (614) 344-4663  
Facsimile: (937) 558-5868  
jim.mccarthy@cofha.com

/s/ Frances Espinoza

Frances Espinoza  
Executive Director  
North Texas Fair Housing Center  
8625 King George Dr., Suite 130  
Dallas, TX 75235  
Telephone: 469-941-0375  
Facsimile: 877-471-1022  
fespinoza@northtexasfairhousing.org

/s/ Nancy L. Haynes

Nancy L. Haynes  
Executive Director  
Fair Housing Center of West Michigan  
20 Hall Street SE  
Grand Rapids, MI 49507  
Telephone: (616) 451-2980  
Facsimile: (616) 451-2657  
nhaynes@fhcwm.org

/s/ David Baade

David Baade  
Executive Director  
Fair Housing Continuum, Inc.  
4760 N. Hwy. US1, Suite 203  
Melbourne, FL 32935-7200  
Telephone: (321) 757-3532  
Facsimile: (321) 757-3535  
fairhousingbaade@bellsouth.net

/s/ Anne V. Houghtaling

Anne V. Houghtaling  
Executive Director

/s/ John R. Petruszak

John R. Petruszak  
Executive Director

OPE Fair Housing Center  
245 W. Roosevelt Road  
Building 15, Suite 107  
West Chicago, IL 60185-3739  
Telephone: (630) 690-6500 x 114  
Facsimile: (630) 690-6586  
anne.houghtaling@hopefair.org

/s/ William R. Tisdale

William R. Tisdale  
President and CEO  
Metropolitan Milwaukee Fair Housing Council  
600 E. Mason Street, Suite 401  
Milwaukee, WI 53202  
Telephone: (414) 278-1240  
Facsimile: (414) 278-8033  
wrtisdale@fairhousingwisconsin.com

/s/ Arturo Alvarado

Arturo Alvarado, Executive Director  
Denver Metro Fair Housing Center  
3401 Quebec Street, Suite 6009  
Denver, CO 80207  
Telephone: (720) 279-4291  
Facsimile: (720) 442-9684  
aalvarado@dmfhc.org

/s/ Gail Schechter

Gail Schechter, Executive Director  
Open Communities  
614 Lincoln Ave.  
Winnetka, IL 60093  
Telephone: (847) 501-5760  
Facsimile: (847) 501-5722  
gail@open-communities.org

/s/ Hilary Mason King

Hilary Mason King, Executive Director  
Housing Research & Advocacy Center  
2728 Euclid Avenue, Suite 200  
Cleveland, OH 44115  
Telephone: (216) 361-9240  
hking@thehousingcenter.org

South Suburban Housing Center  
18220 Harwood Avenue, Suite 1  
Homewood, Illinois 60430  
Telephone: (708) 957-4674, x 22  
Facsimile: (708) 957-4761  
southsuburban@prodigy.net

/s/ Amy Nelson

Amy Nelson, Executive Director  
Fair Housing Center of Central Indiana  
615 N. Alabama Street, Suite 426  
Indianapolis, IN 46204  
Telephone: (317) 644-0673 x 1001  
Facsimile: (317) 245-0322  
anelson@fhcci.org

/s/ Michael Marsh

Michael Marsh, Executive Director  
Toledo Fair Housing Center  
432 N. Superior  
Toledo, OH 43604  
Telephone: (419) 243-6163  
Facsimile: (419) 243-3536  
MichaelMarsh@toledofhc.org

/s/ Cashauna Hill

Cashauna Hill, Executive Director  
Greater New Orleans Fair Housing Action  
Center  
404 South Jefferson Davis Parkway  
New Orleans, LA 70119  
Telephone: (504) 596-2100  
Facsimile: (504) 708-2476  
chill@gnofairhousing.org

/s/ Caroline Peattie

Caroline Peattie, Executive Director  
Fair Housing of Marin  
615 B Street, #1  
San Rafael, CA 94901  
Telephone: (415) 457-5025  
Facsimile: (415) 457-6382  
peattie@fairhousingmarin.com