

## **HOUSING DISCRIMINATION COMPLAINT**

**CASE NUMBER: 03-14-0356-8**

**Originally Filed: February 26, 2014**  
**As Amended: April 30, 2014; August 7, 2014; January 22, 2015; August 5, 2016; February 14, 2017; July 26, 2017**

### **1. Complainants:**

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Wheaton, IL 60187

Open Communities  
614 Lincoln Avenue  
Winnetka, IL 60093

South Suburban Housing Center  
18220 Harwood Avenue, Suite 1  
Homewood, IL 60430

Housing Opportunities Made Equal of Virginia  
626 East Broad Street, Suite 400  
Richmond, VA 23219

Fair Housing Opportunities of Northwest Ohio, Inc.  
d/b/a The Fair Housing Center  
432 North Superior Street  
Toledo, OH 43604

Fair Housing Continuum  
571 Haverty Ct., Suite W  
Rockledge, FL 32955

Greater New Orleans Fair Housing Action Center  
404 S Jefferson Davis Pkwy  
New Orleans, LA 70119

Denver Metro Fair Housing Center  
3280 Downing Street, Suite B  
Denver CO 80205

Metropolitan Milwaukee Fair Housing Council  
759 N Milwaukee Street, Suite 500  
Milwaukee, WI 53202

Fair Housing Center of West Michigan  
20 Hall Street SE  
Grand Rapids, MI 49507

The Miami Valley Fair Housing Center  
505 Riverside Drive  
Dayton, OH 45405

Housing Research & Advocacy Center  
2728 Euclid Avenue, Suite 200  
Cleveland, OH 44115

Fair Housing Center of the Greater Palm Beaches  
1300 W Lantana Road, Suite 200  
Lantana, FL 33462

Fair Housing Center of Central Indiana  
445 N Pennsylvania Street, Suite 811  
Indianapolis, IN 46204

Central Ohio Fair Housing Association  
175 South 3<sup>rd</sup> Street, Suite 580  
Columbus, OH 43215

Housing Opportunities Project for Excellence, Inc.  
11501 NW 2nd Avenue  
Miami, FL 33168

Connecticut Fair Housing Center  
221 Main Street, 4th Floor  
Hartford, CT 06106

North Texas Fair Housing Center  
8625 King George Drive, Suite 130  
Dallas TX 75235

Fair Housing Advocates of Northern California  
1314 Lincoln Avenue, Suite A  
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**2. Other Aggrieved Persons:**

Undetermined.

**3. The following is alleged to have occurred or is about to occur:**

Discriminatory financing (includes real estate transactions).  
Discriminatory terms, conditions, privileges, or services and facilities.  
Otherwise deny or make housing unavailable.

**4. The alleged violation occurred because of:**

Race and National Origin

**5. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):**

Prince George's County, MD & Washington, D.C.  
Memphis, TN

Chicago, IL  
Baltimore, MD  
Hampton Roads, VA  
Toledo, OH  
Orlando, FL  
Minneapolis, MN  
Indianapolis, IN  
Columbus, OH  
Cleveland, OH  
Baton Rouge, LA  
Dayton, OH  
Denver, CO  
Dallas, TX  
Gary, IN  
Hartford, CT  
Milwaukee, WI  
New Orleans, LA  
Grand Rapids, MI  
Muskegon, MI  
Greater Palm Beaches, FL  
Miami-Ft. Lauderdale, FL  
Tampa, FL  
Richmond, VA  
Detroit, MI  
Philadelphia, PA  
Providence, RI  
Vallejo and Richmond, CA  
Kansas City, MO/KS

**6. Respondents:**

Deutsche Bank AG  
60 Wall Street  
New York, NY 10005

Deutsche Bank National Trust  
300 South Grand Avenue  
Los Angeles, CA 90071

Deutsche Bank Trust Company Americas  
60 Wall Street  
New York, NY 10005

Representing Respondents Deutsche Bank AG, Deutsche Bank National Trust,  
Deutsche Bank Trust Company Americas:

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Ocwen Financial Corporation  
1661 Worthington Rd, Suite 100  
West Palm Beach, FL 33409

Altisource Portfolio Solutions, Incorporated  
1000 Abernathy Road NE, Suite 200  
Building 400  
Northpark Town Center  
Atlanta, GA 30328

**7. The following is a brief and concise statement of the facts regarding the alleged violation:**

This amended complaint is brought by the National Fair Housing Alliance; HOPE Fair Housing Center; Housing Opportunities Project for Excellence, Inc., Open Communities; South Suburban Housing Center; Housing Opportunities Made Equal of Virginia; Fair Housing Opportunities of Northwest Ohio, Inc.; Fair Housing Continuum; Greater New Orleans Fair Housing Action Center; North Texas Fair Housing Center; Denver Metro Fair Housing Center; Metropolitan Milwaukee Fair Housing Council; Fair Housing Center of West Michigan; The Miami Valley Fair Housing Center; Housing Research & Advocacy Center; Fair Housing Center of the Greater Palm Beaches; Fair Housing Center of Central Indiana; Central Ohio Fair Housing Association; Connecticut Fair Housing Center; and Fair Housing Advocates of Northern California (collectively, “Complainants”) and arises out of the racially discriminatory behavior of Respondents Deutsche Bank, Deutsche Bank National Trust, Deutsche Bank Trust Company Americas, Ocwen Financial Corporation, and Altisource Portfolio Solutions (collectively, “Respondents”) in their maintenance of foreclosed homes. This complaint is filed under the Fair Housing Act of 1968, as amended, 42 U.S.C. § 3601 et seq. (“FHA”).

Confronted with a national foreclosure crisis, Complainants have turned their attention to the exterior maintenance and marketing of foreclosed properties in an effort to ensure that all communities are being treated equally by those responsible for maintaining foreclosed properties and preparing them for resale. Complainants’ efforts have revealed that there are significant disparities in the exterior maintenance of foreclosed Real Estate Owned properties (“REOs”) and disparities relating to marketing and sales practices in communities of color compared to White communities.

Respondents Deutsche Bank, Deutsche Bank National Trust, and Deutsche Bank Trust Company and Americas (“Deutsche Bank Respondents”) own and maintain

properties in metropolitan areas in Washington, D.C.; Memphis, TN; Chicago, IL; Baltimore, MD; Hampton Roads, VA; Toledo, OH; Orlando, FL; Minneapolis, MN; Indianapolis, IN; Columbus, OH; Cleveland, OH; Baton Rouge, LA; Dayton, OH; Denver, CO; Dallas, TX; Gary, IN; Hartford, CT; Milwaukee, WI; New Orleans, LA; Grand Rapids, MI; Muskegon, MI; Greater Palm Beaches, FL; Miami-Ft. Lauderdale, FL; Tampa, FL; Richmond, VA; Detroit, MI; Philadelphia, PA; Providence, RI; Vallejo and Richmond, CA; and Kansas City, MO/KS. The Deutsche Bank Respondents engaged in a pattern of discrimination in maintaining and marketing REO properties that are located in White communities better than properties located in predominantly African-American and Latino neighborhoods in the same metropolitan area. While Respondents' REO properties in White neighborhoods are more likely to have well-maintained lawns, secured entrances, and professional sales marketing, REO properties in majority Non-White neighborhoods are more likely to have poorly maintained yards, unsecured entrances, appear to be vacant or abandoned, and have poor curb appeal to prospective buyers. The Deutsche Bank Respondents engaged in such discriminatory conduct in communities across the country.

Respondents Ocwen Financial Corp. ("Ocwen Respondents") and Altisource Portfolio Solutions, Inc., provide property maintenance services for Deutsche Bank REO properties. Deutsche Bank contracts with Ocwen and/or Altisource to provide property maintenance services at REOs owned or controlled by Deutsche Bank. Ocwen and Altisource engaged in a pattern of discrimination through the selective fulfillment of their contractual responsibilities based on race and national origin. The Ocwen Respondents engaged in such discriminatory conduct in communities of color across the country.

The result of Respondents' unlawful behavior is deteriorating, neglected REO homes in communities of color, as compared to well-maintained REO properties in White neighborhoods. Respondents' conduct with respect to property maintenance, marketing, and sales practices has impeded neighborhood stabilization and economic recovery, and has impacted homeowners and municipalities by unnecessarily depressing property values. This illegal behavior continues to perpetuate residential segregation in violation of the Fair Housing Act.

Respondents' discriminatory exterior maintenance practices have also interfered with Complainants' efforts and programs designed to promote compliance with fair housing laws, and have frustrated Complainants' missions by perpetuating the very unlawful discrimination that Complainants are dedicated to dismantling. As a result, Complainants have been forced to divert substantial time and resources to detecting, investigating, and counteracting Respondents' unlawful conduct, engaging in outreach and education, and providing financial investments in these areas to revitalize homeownership opportunities in efforts to address Respondents' ongoing discrimination.

In this amended complaint, Complainants make the following changes: (1) addition of new counsel; (2) updated evidentiary data regarding additional REOs located in Prince George's County, MD; Memphis, TN; Baltimore, MD; Orlando, FL; Minneapolis, MN; Cleveland, OH; Baton Rouge, LA; Dallas, TX; New Orleans, LA;

Tampa, FL; Richmond, VA; suburban Detroit, MI; Philadelphia, PA; and Providence, RI; and (3) new evidentiary data regarding REOs located in Kansas City, MO/KS.

### **A. UPDATED EVIDENTIARY FINDINGS**

Complainants incorporate by reference the methodology described in Section III of their amended complaint dated May 1, 2014. To date, Complainants have examined REO properties owned and maintained by Respondents in the following metropolitan areas: (1) Prince George's County, MD and Washington, D.C.; (2) Memphis, TN; (3) Chicago, IL; (4) Baltimore, MD; (5) Hampton Roads, VA; (6) Toledo, OH; (7) Orlando, FL; (8) Minneapolis, MN; (9) Indianapolis, IN; (10) Columbus, OH; (11) Cleveland, OH; (12) Baton Rouge, LA; (13) Dayton, OH; (14) Denver, CO; (15) Dallas, TX; (16) Gary, IN; (17) Hartford, CT; (18) Milwaukee, WI; (19) New Orleans, LA; (20) Grand Rapids, MI; (21) Muskegon, MI; (22) Greater Palm Beaches, FL; (23) Miami-Ft. Lauderdale, FL; (24) Tampa, FL (25) Richmond, VA; (26) Detroit, MI; (27) Philadelphia, PA; (28) Providence, RI; (29) Vallejo and Richmond, CA; and (30) Kansas City, MO/KS. Complainants have investigated a total of 1,100 properties in these 30 metropolitan areas. The following information below reflects Complainants' most up-to-date findings and allegations.

Complainants' investigation of properties in 30 metropolitan areas revealed that Respondents treated properties differently depending on the racial/ethnic composition of the neighborhoods in which they were located. In each of the 30 metropolitan areas surveyed, the REO properties located in predominantly White census tracts were better-maintained and exhibited fewer maintenance deficiencies than the REO properties located in neighborhoods comprised primarily of African-Americans or Latinos. Across the board, properties located in communities of color were considerably more likely to have a substantial number of visible maintenance deficiencies than those located in White areas. Complainants allege in each of the 30 metropolitan areas where Complainants evaluated a number of REO properties owned by Respondents, REO properties in White communities were far more likely to have a small number of maintenance deficiencies or problems as compared to REO properties in communities of color, while REO properties in communities of color were far more likely to have larger numbers of such deficiencies or problems than those in White communities. In addition, in each of the metropolitan areas, Complainants observed significant racial disparities in many of the objective factors evaluated. Accordingly, in each of the 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.

A brief overview of Complainants' findings is included below. Taken together, these results reveal Respondents' systemic practice of providing noticeably inferior maintenance services for REO properties in African-American and Latino communities, and thereby discriminating on the basis of race, color, and/or national origin. There is no business justification for this failed maintenance.

1. PRINCE GEORGE'S COUNTY, MARYLAND & WASHINGTON,  
DISTRICT OF COLUMBIA

In the Washington, D.C. metropolitan area, Complainants investigated 55 REO properties owned by Respondents. Of these 55 REO properties, 44 were located in African-American neighborhoods, 4 were located in predominantly non-White neighborhoods, and 7 were located in predominantly White neighborhoods.

- 57.1% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 93.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 42.9% of the REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies.
- 35.4% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 14.3% of the REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 66.7% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 6.3% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of the properties in predominantly White neighborhoods had the same problem.
- 56.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 14.3% of REO properties in predominantly White neighborhoods had the same problem.
- 10.4% 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 predominantly White neighborhoods had the same problem.



- 41.7% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the properties in predominantly White neighborhoods had the same problem.
- 45.8% of the REO properties in neighborhoods of color had broken or boarded windows, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 8.3% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 31.3% 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 predominantly White neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 10.4% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 47.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had damaged siding, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 35.4% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 8.3% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 10.4% of the REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

## 2. MEMPHIS, TENNESSEE

In the Memphis, TN metropolitan area, Complainants investigated 61 REO properties owned by the Deutsche Bank Respondents. Of these 61 REO properties, 47 were located in predominantly African-American neighborhoods; 2 were located in predominantly non-White neighborhoods, and 12 were located in predominantly White neighborhoods.

- 50.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 2.0% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 98.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 50.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 57.1% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 8.2% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 69.4% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 8.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 67.3% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 57.1% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.8% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 16.7% of the REO properties in predominately White neighborhoods had the same problem.
- 22.4% of the REO properties in neighborhoods of color had a broken mailbox, while only 8.3% of the REO properties in predominately White neighborhoods had the same problem.
- 63.3% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 67.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 8.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 55.1% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 53.1% of the REO properties in neighborhoods of color had wood rot, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 51.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 41.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 51.0% of the REO properties in neighborhoods of color had damaged siding, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 10.2% of the REO properties in neighborhoods of color had missing or damaged shutters, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 22.4% of REO properties in neighborhoods of color had obstructed gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 49.0% of the REO properties in neighborhoods of color had a small amount of mold, while only 41.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 16.3% of the REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 61.2% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 8.3% of the REO properties in predominantly White neighborhoods had the same problem.

### 3. CHICAGO, ILLINOIS

In the Chicago, IL metropolitan area, Complainants investigated 105 REO properties owned by the Deutsche Bank Respondents. Of these 105 REO properties, 41 were located in predominantly African-American neighborhoods; 25 were located in predominantly Latino neighborhoods; 11 were located in predominantly non-White neighborhoods, and 28 were located in predominantly White neighborhoods.

- 35.7% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 18.2% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 81.8% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 64.3% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 29.9% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 7.1% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 63.6% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.

- 27.3% of the REO properties in neighborhoods of color had accumulated mail, while only 17.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 41.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.1% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in dead grass, while only 3.6% of the REO properties in predominately White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 21.4% of the REO properties in predominately White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 17.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 18.2% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 7.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 45.5% of the REO properties in neighborhoods of color had broken or boarded windows, while only 10.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 26.0% of the REO properties in neighborhoods of color had wood rot, while only 21.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 9.1% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 59.7% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.7% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 3.6% of the REO properties in predominantly White neighborhoods had the same problem.

- 13.0% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 7.1% of the REO properties in predominantly White neighborhoods had the same problem.

#### 4. BALTIMORE, MARYLAND

In the Baltimore, MD metropolitan area, Complainants investigated 55 REO properties owned by the Deutsche Bank Respondents. Of these 52 properties, 35 were located in predominantly African-American neighborhoods, 2 were located in predominantly non-White neighborhoods, and 18 were located in predominantly White neighborhoods.

- 44.4% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 21.6% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 78.4% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 55.6% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 21.6% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 78.4% 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 predominantly White neighborhoods had the same problem.
- 32.4% of the REO properties in neighborhoods of color had accumulated mail, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 51.4% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 5.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.5% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.

- 45.9% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 10.8% of the REO properties in neighborhoods of color had a broken mailbox, while only 5.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 29.7% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 18.9% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 5.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.9% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 10.8% of the REO properties in neighborhoods of color had broken or discarded signage, while only 5.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 37.8% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 27.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 35.1% of the REO properties in neighborhoods of color had a small amount of mold on the property, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.

#### 5. HAMPTON ROADS, VIRGINIA

In the Hampton Roads, VA metropolitan area, Complainants investigated 10 REO properties owned by the Deutsche Bank Respondents. Of these 10 properties, 5 were located in predominantly African-American neighborhoods and 5 were located in predominantly White neighborhoods.

- 40.0% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 60.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.

- 80.0% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly 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 predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 80.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% 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 predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had damaged steps and handrails, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had a damaged fence, while only 20.0% of the REO properties in White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly White neighborhoods had the same problem.



- 40.0% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 100.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.

## 6. TOLEDO, OHIO

In the Toledo, OH metropolitan area, Complainants investigated 25 REO properties owned by the Deutsche Bank Respondents. Of these 25 REO properties, 8 were located in predominantly African-American neighborhoods; 1 was located in a predominantly non-White neighborhood, and 16 were located in predominantly White neighborhoods.

- 43.8% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 88.9% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 56.3% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 66.7% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 6.3% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

- 22.2% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 11.1% of the REO properties in neighborhoods of color had accumulated mail, while only 6.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had overgrown grass or leaves, while only 18.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 31.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 6.3% of the REO properties in predominately White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a broken mailbox, while only 6.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 18.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had broken or boarded windows, while only 31.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had a damaged roof, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.

- 55.6% of the REO properties in neighborhoods of color had a damaged fence, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had wood rot, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color were marketed as distressed properties, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had obstructed gutters, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

## 7. ORLANDO, FLORIDA

In the Orlando, FL metropolitan area, Complainants evaluated 64 REO properties owned by the Deutsche Bank Respondents. Of these 64 REO properties, 19 were located in predominantly African-American neighborhoods; 9 were located in predominantly Latino neighborhoods; 9 were located in predominantly non-White neighborhoods, and 27 were located in predominantly White neighborhoods.

- 14.8% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies, while only 2.7% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 97.3% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 85.2% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 70.3% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 40.7% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 37.8% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 86.5% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 51.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.9% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 40.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 62.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 44.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 43.2% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 18.5% of the REO properties in predominately White neighborhoods had the same problem.
- 40.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 29.6% of the REO properties in predominately White neighborhoods had the same problem.
- 29.7% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 18.5% of the REO properties in predominately White neighborhoods had the same problem.

- 45.9% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 29.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 54.1% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 21.6% of the REO properties in neighborhoods of color had a damaged roof, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 59.5% of the REO properties in neighborhoods of color had a damaged fence, while only 48.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 43.2% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 29.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.9% of the REO properties in neighborhoods of color had wood rot, while only 48.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 24.3% of the REO properties in neighborhoods of color had trespassing or warning signs displayed on the property, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 5.4% of the REO properties in neighborhoods of color were marketed as a distressed property, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 10.8% of the REO properties in neighborhoods of color had graffiti, while only 3.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 44.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 43.2% of the REO properties in neighborhoods of color had damaged siding, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.

- 21.6% of REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 40.5% of the REO properties in neighborhoods of color had obstructed gutters, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 45.9% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 29.6% of the REO properties in predominantly White neighborhoods had the same problem.

#### 8. MINNEAPOLIS, MINNESOTA

In the Minneapolis, MN metropolitan area, Complainants investigated 24 REO properties owned by the Deutsche Bank Respondents. Of these 24 REO properties, 6 were located in predominantly African-American neighborhoods; 9 were located in predominantly non-White neighborhoods, and 9 were located in predominantly White neighborhoods.

- 33.3% of REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 66.7% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 60.0% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 93.3% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 55.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had accumulated mail, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.

- 80.0% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 44.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 44.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 13.3% 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 predominately White neighborhoods had the same problem.
- 53.3% 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 predominately White neighborhoods had the same problem.
- 6.7% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominately White neighborhoods had the same problem.
- 53.3% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 44.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had broken or boarded windows, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had a damaged fence, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 33.3% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had damaged siding, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 46.7% of REO properties in neighborhoods of color had missing or out of place gutters, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had obstructed gutters, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

#### 9. INDIANAPOLIS, INDIANA

In the Indianapolis, IN metropolitan area, Complainants investigated 18 REO properties owned by the Deutsche Bank Respondents. Of these 18 REO properties, 9 were located in predominantly African-American neighborhoods; 2 were located in predominantly non-White neighborhoods; and 7 were located in predominantly White neighborhoods.

- 42.9% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 9.1% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 90.9% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 57.1% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 36.4% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 14.3% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 9.1% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White



neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 63.6% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had accumulated mail, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 90.9% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 57.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 28.6% of the REO properties in predominately White neighborhoods had the same problem.
- 45.5% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 45.5% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 54.5% of the REO properties in neighborhoods of color had broken or boarded windows, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 18.2% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 18.2% of the REO properties in neighborhoods of color were marketed as distressed properties, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 45.5% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 72.7% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 57.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had damaged siding, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.

#### 10. COLUMBUS, OHIO

In the Columbus, OH metropolitan area, Complainants investigated 21 REO properties owned by the Deutsche Bank Respondents. Of these 21 REO properties, 7 were located in predominantly African-American neighborhoods; 2 were located in predominantly non-White neighborhoods, and 12 were located in predominantly White neighborhoods.

- 25.0% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 75.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 66.7% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 33.3% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

- 22.2% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while only 8.3% of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 55.6% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 41.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had accumulated mail, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 8.3% of the REO properties in predominately White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had a damaged fence, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had broken or discarded signage, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.

- 88.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 41.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had damaged siding, while only 8.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of REO properties in neighborhoods of color had obstructed gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of REO properties in neighborhoods of color had pervasive mold, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.

## 11. CLEVELAND, OHIO

In the Cleveland, OH metropolitan area, Complainants investigated 32 REO properties owned by the Deutsche Bank Respondents. Of these 32 REO properties, 21 were located in predominantly African-American neighborhoods and 11 were located in predominantly White neighborhoods.

- 45.5% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 54.5% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 33.3% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 18.2% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 14.3% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 47.6% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 9.1% of the REO properties in predominately White neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 61.9% of the REO properties in neighborhoods of color had broken or boarded windows, while only 54.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had a damaged roof, while only 9.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had a damaged fence, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had wood rot, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.

- 14.3% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 81.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 45.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 61.9% of the REO properties in neighborhoods of color had damaged siding, while only 36.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a small amount of mold, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.

## 12. BATON ROUGE, LOUISIANA

In the Baton Rouge, LA metropolitan area, Complainants investigated 20 REO properties owned by the Deutsche Bank Respondents. Of these 20 REO properties, 14 were located in predominantly African-American neighborhoods and 6 were located in predominantly White neighborhoods.

- 33.3% of REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 66.7% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 92.9% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 16.7% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 57.1% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 92.9% 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 predominantly White neighborhoods had the same problem.
- 64.3% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 33.3% of the REO properties in predominately White neighborhoods had the same problem.
- 35.7% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 78.6% of the REO properties in neighborhoods of color had broken or boarded windows, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had a damaged roof, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had a damaged fence, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.3% of the REO properties in neighborhoods of color had wood rot, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 7.1% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 21.4% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.3% of the REO properties in neighborhoods of color had damaged siding, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

### 13. DAYTON, OHIO

In the Dayton, OH metropolitan area, Complainants investigated 36 REO properties owned by the Deutsche Bank Respondents. Of these 36 REO properties, 15 were located in predominantly African-American neighborhoods and 21 were located in predominantly White neighborhoods.

- 33.3% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 66.7% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 53.3% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 33.3% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 13.3% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.



REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 40.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 23.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 46.7% of the REO properties in neighborhoods of color had accumulated mail, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 73.3% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 53.3% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 19.0% of the REO properties in predominately White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a damaged roof, while only 19.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a damaged fence, while only 23.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 46.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 19.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 46.7% of the REO properties in neighborhoods of color had wood rot, while only 19.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color were marketed as distressed, while only 4.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of REO properties in neighborhoods of color had missing or out of place gutters, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 46.7% of REO properties in neighborhoods of color had a small amount of mold, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.

#### 14. DENVER, COLORADO

In the Denver, CO metropolitan area, Complainants investigated 21 REO properties owned by the Deutsche Bank Respondents. Of these 21 REO properties, 2 were located in predominantly African-American neighborhoods; 8 were located in predominantly Latino neighborhoods; 3 were located in predominantly non-White neighborhoods, and 8 were located in predominantly White neighborhoods.

- 62.5% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 37.5% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 46.2% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods.

Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 53.8% 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 predominantly White neighborhoods had the same problem.
- 38.5% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 69.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in dead grass, while none of the REO properties in predominately White neighborhoods had the same problem.
- 53.8% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 69.2% of the REO properties in neighborhoods of color had broken or boarded windows, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 23.1% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 61.5% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 38.5% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had damaged siding, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 53.8% of REO properties in neighborhoods of color had missing or out of place gutters, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.5% of REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.

### 15. DALLAS, TEXAS

In the Dallas, TX metropolitan area, Complainants investigated 62 REO properties owned by the Deutsche Bank Respondents. Of these 62 REO properties, 19 were located in predominantly African-American neighborhoods; 20 were located in predominantly Latino neighborhoods; 8 were located in predominantly non-White neighborhoods, and 15 were located in predominantly White neighborhoods.

- 40.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 12.8% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 87.2% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 60.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 51.1% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 6.7% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 8.5% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 61.7% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 61.7% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 53.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 19.1% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 6.7% of the REO properties in predominately White neighborhoods had the same problem.
- 21.3% of the REO properties in neighborhoods of color had a broken mailbox, while only 6.7% of the REO properties in predominately White neighborhoods had the same problem.
- 31.9% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 17.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 36.2% of the REO properties in neighborhoods of color had broken or boarded windows, while only 26.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 17.0% of the REO properties in neighborhoods of color had a damaged roof, while only 6.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.0% of the REO properties in neighborhoods of color had a damaged fence, while only 53.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 53.2% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 51.1% of the REO properties in neighborhoods of color had wood rot, while only 26.7% of the REO properties in predominantly White neighborhoods had the same problem.

- 8.5% of the REO properties in neighborhoods of color were marketed as distressed properties, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 44.7% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 26.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 12.8% of the REO properties in neighborhoods of color had broken or discarded signage, while only 6.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 12.8% of the REO properties in neighborhoods of color had graffiti, while only 6.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 51.1% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 48.9% of the REO properties in neighborhoods of color had damaged siding, while only 6.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 17.0% of REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 31.9% of REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 26.7% of the REO properties in predominantly White neighborhoods had the same problem.

#### 16. GARY, INDIANA

In the Gary, IN metropolitan area, Complainants investigated 22 REO properties owned by the Deutsche Bank Respondents. Of these 22 REO properties, 8 were located in predominantly African-American neighborhoods; 1 was located in a predominantly non-White neighborhood, and 13 were located in predominantly White neighborhoods.

- 53.8% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 46.2% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.

- 66.7% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 7.7% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 77.8% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 38.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 15.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 77.8% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 38.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of the REO properties in predominately White neighborhoods had the same problem.
- 33.3% 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 predominately White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 23.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 23.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 88.9% of the REO properties in neighborhoods of color had broken or boarded windows, while only 30.8% of the REO properties in predominantly White neighborhoods had the same problem.

- 22.2% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had wood rot, while only 7.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 30.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 30.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had damaged siding, while only 15.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.6% of REO properties in neighborhoods of color had obstructed gutters, while only 15.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 7.7% of the REO properties in predominantly White neighborhoods had the same problem.

## 17. HARTFORD, CONNECTICUT

In the Hartford, CT metropolitan area, Complainants investigated 16 REO properties owned by the Deutsche Bank Respondents. Of these 16 REO properties, 5 were located in predominantly African-American neighborhoods, 2 were located in predominantly Latino neighborhoods, 5 were located in predominantly non-White neighborhoods, and 4 were located in predominantly White neighborhoods.

- 75.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 16.7% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.



- 83.3% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 25.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 8.3% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 58.3% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 91.7% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 58.3% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 50.0% 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 predominately White neighborhoods had the same problem.
- 50.0% 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 predominately 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 predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 58.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had wood rot, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 58.3% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 41.7% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.

#### 18. MILWAUKEE, WISCONSIN

In the Milwaukee, WI metropolitan area, Complainants investigated 80 REO properties owned by the Deutsche Bank Respondents. Of these 80 REO properties, 46 were located in predominantly African-American neighborhoods; 7 were located in predominantly Latino neighborhoods; 4 were located in predominantly non-White neighborhoods, and 23 were located in predominantly White neighborhoods.

- 69.6% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 14.0% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 86.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 30.4% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.

- 17.5% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 59.6% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 21.7 % of the REO properties in predominantly White neighborhoods had the same problem.
- 42.1% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 8.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 45.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 21.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 5.3% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominately White neighborhoods had the same problem.
- 42.1% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 13.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 24.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 4.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 61.4% of the REO properties in neighborhoods of color had broken or boarded windows, while only 13.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.8% of the REO properties in neighborhoods of color had a damaged roof, while only 8.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 21.1% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 17.4% of the REO properties in predominantly White neighborhoods had the same problem.

- 10.5% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 19.3% of the REO properties in neighborhoods of color had trespassing or warning signs displayed on the property, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 45.6% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 34.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 12.3% of the REO properties in neighborhoods of color had unauthorized occupancy on the premises, while only 4.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 50.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 39.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 24.6% of the REO properties in neighborhoods of color had damaged siding, while only 13.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 12.3% of REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 22.8% of the REO properties in neighborhoods of color had obstructed gutters, while only 8.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 26.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

### 19. NEW ORLEANS, LOUISIANA

In the New Orleans, LA metropolitan area, Complainants investigated 42 REO properties owned by the Deutsche Bank Respondents. Of these 42 REO properties, 29 were located in predominantly African-American neighborhoods; 5 were located in predominantly non-White neighborhoods, and 8 were located in predominantly White neighborhoods.

- 79.4% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 25.0% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 17.6% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 73.5% 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 predominantly White neighborhoods had the same problem.
- 58.8% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 64.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 37.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 41.2% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 25.0% of the REO properties in predominately White neighborhoods had the same problem.
- 52.9% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 37.5% of the REO properties in predominately White neighborhoods had the same problem.
- 14.7% 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 predominately White neighborhoods had the same problem.
- 8.8% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominately White neighborhoods had the same problem.
- 17.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 61.8% of the REO properties in neighborhoods of color had broken or boarded windows, while only 37.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 23.5% of the REO properties in neighborhoods of color had a damaged roof, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 67.6% of the REO properties in neighborhoods of color had a damaged fence, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 44.1% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 55.9% of the REO properties in neighborhoods of color had wood rot, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 20.6% of the REO properties in neighborhoods of color had broken or discarded signage, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 5.9% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 52.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 76.5% of the REO properties in neighborhoods of color had damaged siding, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 8.8% of the REO properties in neighborhoods of color had damaged or missing shutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 70.6% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.

## 20. GRAND RAPIDS, MICHIGAN

In the Grand Rapids, MI metropolitan area, Complainants investigated 14 REO properties owned by the Deutsche Bank Respondents. Of these 14 REO properties, 3 were located in predominantly African-American neighborhoods; 2 were located in predominantly non-White neighborhoods; and 9 were located in predominantly White neighborhoods.

- 55.6% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 20.0% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 80.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 44.4% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 40.0% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 11.1% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 80.0% 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 predominantly White neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had accumulated mail, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had a damaged fence, while only 22.2% of the REO properties in predominantly White neighborhoods had the same problem.

- 20.0% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 44.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had damaged siding, while only 33.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 20.0% of REO properties in neighborhoods of color had broken or hanging gutters, while only 11.1% of the REO properties in predominantly White neighborhoods had the same problem.

## 21. MUSKEGON, MICHIGAN

In the Muskegon, MI metropolitan area, Complainants investigated 26 REO properties owned by the Deutsche Bank Respondents. Of these 26 REO properties, 7 were located in predominantly African-American neighborhoods; 2 were located in predominantly non-White neighborhoods, and 17 were located in predominantly White neighborhoods.

- 52.9% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 88.9% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 47.1% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 22.2% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 11.8% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:



- 66.7% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 29.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.1% 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 predominately White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 23.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had a damaged fence, while only 5.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had wood rot, while only 5.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color were marketed as distressed properties, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 88.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 29.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 5.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.1% of REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had water damage, while only 5.9% of the REO properties in predominantly White neighborhoods had the same problem.

- 22.2% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

## 22. GREATER PALM BEACHES, FLORIDA

In the Greater Palm Beaches, FL metropolitan area, Complainants investigated 41 REO properties owned by the Deutsche Bank Respondents. Of these 41 REO properties, 1 was located in a predominantly African-American neighborhood; 11 were located in predominantly Latino neighborhoods; 9 were located in predominantly non-White neighborhoods; and 20 were located in predominantly White neighborhoods.

- 40.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 4.8% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 95.2% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 60.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 57.1% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 10.0% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 81.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had accumulated mail, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had overgrown grass or leaves, while only 30.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 61.9% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 45.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 23.8% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 5.0% of the REO properties in predominately White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 25.0% of the REO properties in predominately White neighborhoods had the same problem.
- 52.4% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 30.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 61.9% of the REO properties in neighborhoods of color had broken or boarded windows, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had a damaged roof, while only 5.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had a damaged fence, while only 30.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 30.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had wood rot, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 19.0% of the REO properties in neighborhoods of color had graffiti, while only 5.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had a small amount of mold, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.

### 23. MIAMI-FT. LAUDERDALE, FLORIDA

In the Miami-Ft. Lauderdale, FL metropolitan area, Complainants investigated 63 REO properties owned by the Deutsche Bank Respondents. Of these 63 REO properties, 27 were located in predominantly African-American neighborhoods; 11 were located in predominantly Latino neighborhoods; 9 were located in predominantly non-White neighborhoods, and 16 were located in predominantly White neighborhoods.

- 31.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.6% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 89.4% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 68.8% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 68.1% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 18.8% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 23.4% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 74.5% 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 predominantly White neighborhoods had the same problem.
- 55.3% of the REO properties in neighborhoods of color had overgrown grass and leaves, while only 31.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 63.8% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 56.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 38.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 6.3% of the REO properties in predominately White neighborhoods had the same problem.

- 34.0% of the REO properties in neighborhoods of color had at least 50% or more of the property covered in invasive plants, while only 12.5% of the REO properties in predominately White neighborhoods had the same problem.
- 19.1% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominately White neighborhoods had the same problem.
- 10.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 6.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 31.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 23.4% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 40.4% of the REO properties in neighborhoods of color had a damaged fence, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 57.4% 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 predominantly White neighborhoods had the same problem.
- 57.4% of the REO properties in neighborhoods of color had wood rot, while only 12.5% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.3% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 31.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 14.9% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 66.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 29.8% of the REO properties in neighborhoods of color had damaged siding, while only 6.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 8.5% of the REO properties in neighborhoods of color had missing or damaged shutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 12.8% of REO properties in neighborhoods of color had broken or hanging gutters, while only 6.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 21.3% of the REO properties in neighborhoods of color had pervasive mold, while only 6.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 55.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 43.8% of the REO properties in predominantly White neighborhoods had the same problem.

#### 24. TAMPA, FLORIDA

In the Tampa, FL metropolitan area, Complainants investigated 27 REO properties owned by the Deutsche Bank Respondents. Of these 27 REO properties, 4 were located in predominantly African-American neighborhoods; 3 were located in Latino neighborhoods; 9 were located in Majority Non-White neighborhoods; and 11 were located in predominantly White neighborhoods.

- 72.7% of REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.3% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 93.8% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 27.3% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 43.8% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 9.1% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 12.5% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods.

Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 68.8% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 62.5% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 36.4% of the REO properties in predominantly White neighborhoods had the same problem
- 75.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 27.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the REO properties in predominately White neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 9.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had broken or boarded windows, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had a damaged roof, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly White neighborhoods had the same problem.

- 37.5% of the REO properties in neighborhoods of color had damaged siding, while only 9.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had missing or out-of-place gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had obstructed gutters, while only 18.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 9.1% of the REO properties in predominantly White neighborhoods had the same problem.

## 25. RICHMOND, VIRGINIA

In the Richmond, VA metropolitan area, Complainants investigated 39 REO properties owned by the Deutsche Bank Respondents. Of these 39 REO properties, 18 were located in predominantly African-American neighborhoods, 1 was located in a majority Non-White neighborhood, and 20 were located in predominantly White neighborhoods.

- 25.0% of REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.3% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 94.7% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 75.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 52.6% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 40.0% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 21.1% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:



- 57.9% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 35.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 47.4% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 26.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 10.0% of the REO properties in predominately White neighborhoods had the same problem.
- 15.8% of the REO properties in neighborhoods of color had a broken mailbox, while only 5.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 36.8% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 25.0% of the REO properties in predominately White neighborhoods had the same problem.
- 31.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 68.4% of the REO properties in neighborhoods of color had broken or boarded windows, while only 15.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 47.4% of the REO properties in neighborhoods of color had a damaged fence, while only 35.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 42.1% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 57.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 50.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 47.4% of the REO properties in neighborhoods of color had damaged siding, while only 40.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 52.6% of the REO properties in neighborhoods of color had missing or out-of-place gutters, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 26.3% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 21.1% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 10.0% of the REO properties in predominantly White neighborhoods had the same problem.

## 26. SUBURBAN DETROIT, MICHIGAN

In the Detroit, MI metropolitan area, Complainants investigated 43 REO properties owned by the Deutsche Bank Respondents. Of these 43 REO properties, 11 were located in predominantly African-American neighborhoods; 6 were located in predominantly non-White neighborhoods, and 26 were located in predominantly White neighborhoods.

- 57.7% of REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.8% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 88.2% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 42.3% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 11.8% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 7.7% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.
- 5.9% of the REO properties in neighborhoods of color had 15 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 15 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 64.7% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 26.9% of the REO properties in predominantly White neighborhoods had the same problem.

- 70.6% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 34.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 23.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 19.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 23.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 19.2% of the REO properties in predominantly White neighborhoods had the same problem.
- 41.2% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 19.2% of the REO properties in predominately White neighborhoods had the same problem.
- 41.2% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 7.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 41.2% of the REO properties in neighborhoods of color had broken or boarded windows, while only 3.8% of the REO properties in predominantly White neighborhoods had the same problem.
- 29.4% of the REO properties in neighborhoods of color had a damaged fence, while only 23.1% of the REO properties in predominantly White neighborhoods had the same problem.
- 23.5% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 15.4% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.8% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 41.2% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 34.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 29.4% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 7.7% of the REO properties in predominantly White neighborhoods had the same problem.

- 23.5% of REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 35.3% of the REO properties in neighborhoods of color had obstructed gutters, while only 15.4% of the REO properties in predominantly White neighborhoods had the same problem.

## 27. PHILADELPHIA, PENNSYLVANIA

In the Philadelphia, PA metropolitan area, Complainants investigated 28 REO properties owned by the Deutsche Bank Respondents. Of these 28 properties, 13 were located in predominantly African-American neighborhoods, 3 were located in predominantly non-White neighborhoods, and 12 were located in predominantly White neighborhoods.

- 58.3% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.3% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 93.8% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 41.7% of the REO properties in predominantly 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 only 8.3% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 56.3% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had accumulated mail, while only 16.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 62.5% of the REO properties in neighborhoods of color had overgrown grass or accumulated leaves, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.

- 37.5% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 18.8% 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 predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 56.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 8.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 62.5% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 41.7% of the REO properties in predominantly White neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly White neighborhoods had the same problem.

## 28. PROVIDENCE, RHODE ISLAND

In the Providence, RI metropolitan area, Complainants investigated 19 REO properties owned by the Deutsche Bank Respondents. Of these 19 REO properties, 6 were located in predominantly Latino neighborhoods; 6 were located in predominantly non-White neighborhoods; and 7 were located in predominantly White neighborhoods.

- 28.6% of the REO properties in predominantly 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.

- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 71.4% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 75.0% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while only 28.6% of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 75.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while only 42.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had accumulated mail, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of the REO properties in predominately White neighborhoods had the same problem.
- 41.7% 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 predominately White neighborhoods had the same problem.
- 58.3% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 83.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.

- 41.7% of the REO properties in neighborhoods of color had a damaged fence, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% 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 predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had wood rot, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 42.9% of the REO properties in predominantly White neighborhoods had the same problem.
- 83.3% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 14.3% of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had damaged siding, while only 28.6% of the REO properties in predominantly White neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

## 29. VALLEJO AND RICHMOND, CALIFORNIA

In the Vallejo and Richmond, CA metropolitan area, Complainants investigated 22 REO properties owned by the Deutsche Bank Respondents. Of these 22 properties, 5 were located in predominantly Latino neighborhoods, 13 were located in predominantly non-White neighborhoods, and 4 were located in predominantly White neighborhoods.

- 25.0% of the REO properties in predominantly White neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 16.7% of the REO properties in neighborhoods of color had fewer than 5 deficiencies.
- 83.3% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 75.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 22.2% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 61.1% 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 predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had unsecured or broken doors, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had broken or boarded windows, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 66.7% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color were marketed as distressed, while none of the REO properties in predominantly White neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 25.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly White neighborhoods had the same problem.



### 30. KANSAS CITY, MISSOURI / KANSAS

In the Kansas City, MO/KS metropolitan area, Complainants investigated 10 REO properties owned by the Deutsche Bank Respondents. Of these 10 REO properties, 2 were located in predominantly African-American neighborhoods, 1 was located in a predominantly Latino neighborhood; 2 were located in predominantly non-White neighborhoods; and 5 were located in predominantly White neighborhoods.

- 80.0% of the REO properties in predominantly 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.
- 100.0% of the REO properties in neighborhoods of color had 5 or more maintenance or marketing deficiencies, while only 20.0% of the REO properties in predominantly White neighborhoods had 5 or more deficiencies.
- 40.0% of the REO properties in neighborhoods of color had 10 or more maintenance or marketing deficiencies, while none of the REO properties in predominantly White neighborhoods had 10 or more deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly White neighborhoods. Complainants found significant racial disparities in the majority of the objective factors they measured, including the following:

- 60.0% of the REO properties in neighborhoods of color had substantial amounts of trash on the premises, while none of the REO properties in predominately White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had accumulated mail, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while none of the REO properties in predominately White neighborhoods had the same problem.
- 40.0% 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 predominately White neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the REO properties in predominately White neighborhoods had the same problem.

- 40.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominately White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had broken or boarded windows, while none of the REO properties in predominately White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominately White neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominately White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had a trespassing or warning sign, while none of the REO properties in predominately White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominately White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 20.0% of the REO properties in predominantly White neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly White neighborhoods had the same problem.

## **B. INJURY CAUSED BY RESPONDENTS**

Complainants allege that the unlawful discriminatory actions of Respondents have injured Complainants by: (a) interfering with the efforts and programs intended to promote fair housing and lending; (b) requiring Complainants to commit scarce resources and substantial staff time to evaluate properties, review data, investigate complaints, review Respondents' REO maintenance practices, engage in an education and outreach campaign, and develop educational materials to identify and counteract the unlawful actions of Respondents, thus diverting those resources from other testing, education,

counseling, and capacity-building services; and (c) frustrating Complainants' missions and purposes of increasing fair and equal access to housing for all Americans, regardless of race. The discriminatory actions of Respondents have required Complainants, and will require Complainants in the future, to spend additional resources to counteract Respondents' discriminatory conduct.

Complainants allege that as a result of Respondents' discriminatory conduct, municipalities, individuals, and homeowners in the communities served by Complainants have been: (a) subjected to deteriorating and dilapidated living conditions in their neighborhoods; (b) denied opportunities for neighborhood stabilization and economic recovery; and (c) harmed in their home investments because of Respondents' efforts to unnecessarily depress the property value of REOs. Complainants allege that as a result of Respondents' discriminatory conduct, communities served by NFHA and its member organizations have been denied the fair housing opportunities, educational opportunities, employment opportunities, and economic growth that accompany well-maintained properties. In response, Complainants have made substantial efforts and expended considerable resources to investigate the existence and effects of Respondents' REO maintenance policies and to ensure commensurate housing opportunities for all people. As part of these efforts, in 2011, Complainant NFHA released a report highlighting the discriminatory maintenance and marketing of White and Non-White REO properties by banks. The release of this comprehensive report put Respondents on notice of the fact that these discriminatory practices violate the Fair Housing Act.

Complainants allege that Respondents' systemic and particularized practice of maintaining and marketing its REO properties in a state of disrepair in communities of color, while maintaining and marketing such properties in predominantly White communities in a materially better condition, violates the Fair Housing Act, 42 U.S.C. § 3604(a), (b), (c), and (d), § 3605, and HUD's implementing regulations.

**8. The most recent date on which the alleged discrimination occurred:**

07/11/2017 and ongoing.

**9. Types of Federal Funds identified:**

None.

**10. The acts alleged in this complaint, if proven, may constitute a violation of the following:**

Sections 804(a)(b)(c)(d) and 805 of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

**Please sign and date this form:**

**I declare under penalty of perjury that I have read this complaint (including any**

**attachments) and that it is true and correct.**

<u>/s/ Shanna Smith</u> National Fair Housing Alliance	<u>7/26/17</u> (Date)
<u>/s/ Anne Houghtaling</u> HOPE Fair Housing Center	<u>7/26/17</u> (Date)
<u>/s/ David Luna</u> Open Communities	<u>7/26/17</u> (Date)
<u>/s/ John Petruszak</u> South Suburban Housing Center	<u>7/26/17</u> (Date)
<u>/s/ Heather Crislip</u> HOME Housing Opportunities Made Equal of Virginia	<u>7/26/17</u> (Date)
<u>/s/ Michael Marsh</u> Fair Housing Opportunities of Northwest Ohio, Inc.	<u>7/26/17</u> (Date)
<u>/s/ David Baade</u> Far Housing Continuum	<u>7/26/17</u> (Date)
<u>/s/ Cashauna Hill</u> Greater New Orleans Fair Housing Action Center	<u>7/26/17</u> (Date)
<u>/s/ Arturo Alvarado</u> Denver Metro Fair Housing Center	<u>7/26/17</u> (Date)
<u>/s/ William Tisdale</u> Metro Milwaukee Fair Housing Council	<u>7/26/17</u> (Date)
<u>/s/ Nancy Haynes</u> Fair Housing Center of West Michigan	<u>7/26/17</u> (Date)
<u>/s/Jim McCarthy</u> The Miami Valley Fair Housing Center	<u>7/26/17</u> (Date)
<u>/s/ Carrie Pleasants</u> Housing Research & Advocacy Center	<u>7/26/17</u> (Date)
<u>/s/ Vince Larkins</u> Fair Housing Center of the Greater Palm Beaches	<u>7/26/17</u> (Date)
<u>/s/ Amy Nelson</u> Fair Housing Center of Central Indiana	<u>7/26/17</u> (Date)

<u>/s/ Jim McCarthy</u> Central Ohio Fair Housing Association	<u>7/26/17</u> (Date)
<u>/s/ Keenya Robertson</u> HOPE, Inc. Fair Housing Center	<u>7/26/17</u> (Date)
<u>/s/ Erin Kemple</u> Connecticut Fair Housing Center	<u>7/26/17</u> (Date)
<u>/s/ Frances Espinoza</u> North Texas Fair Housing Center	<u>7/26/17</u> (Date)
<u>/s/Caroline Peattie</u> Fair Housing Advocates of Northern California	<u>7/26/17</u> (Date)