

**The Attorney General's
2017 Annual Report to Congress
Pursuant to the Equal Credit Opportunity Act
Amendments of 1976**



Submitted by

**John M. Gore
Acting Assistant Attorney General
Civil Rights Division**

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The Department of Justice (DOJ or the Department) submits this report regarding its activities in 2017 to enforce the Equal Credit Opportunity Act (ECOA), 15 U.S.C. 1691, *et seq.* See 15 U.S.C. 1691f. The report also includes information about DOJ's lending work under the Fair Housing Act (FHA), 42 U.S.C. 3601, *et seq.*, and the Servicemembers Civil Relief Act (SCRA), 50 U.S.C. 3901, *et seq.* Within DOJ, the Civil Rights Division (the Division) is responsible for enforcing ECOA, the FHA, and the SCRA. The Division's Housing and Civil Enforcement Section handles this responsibility.

I. INTRODUCTION

In 2017, the Civil Rights Division attained substantial relief for victims of lending discrimination in two settlements addressing discrimination in mortgage lending, and for servicemembers in three settlements involving unlawful repossessions and foreclosures. The Division also filed a case alleging sexual harassment related to mortgage lending under ECOA and the FHA, and a case alleging unlawful foreclosures under the SCRA. The Division continues to investigate allegations of unlawful discrimination in lending by lenders around the nation.

II. LENDING DISCRIMINATION ENFORCEMENT UNDER ECOA AND THE FHA

The Division has authority to enforce ECOA and the FHA on its own initiative or upon referral from another agency. ECOA prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, or age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act. The FHA prohibits discrimination in home mortgage loans, home improvement loans, and other home credit transactions because of race, color, religion, sex, national origin, familial status, or disability.

In cases involving discrimination in mortgage loans or home improvement loans, the Division may file suit under both ECOA and the FHA.

The Division has authority under both statutes to challenge a pattern or practice of discriminatory conduct. The Division investigates abuses in the mortgage market, including redlining and discriminatory underwriting and pricing. The Division also investigates allegations of unlawful conduct in non-mortgage lending, including discrimination in auto loans, unsecured consumer loans, student loans, and credit card products.

Civil Rights Division Partners

Bank regulatory agencies

BCFP - Bureau of Consumer Financial Protection

FDIC - Federal Deposit Insurance Corporation

FRB - Federal Reserve Board

NCUA - National Credit Union Administration

OCC - Office of the Comptroller of the Currency

Other partners

FTC - Federal Trade Commission

HUD - Dep't of Housing and Urban Development

In 2017, the Division opened seven fair lending investigations involving allegations of a variety of lending violations, filed three lawsuits alleging fair lending violations, and settled two, obtaining nearly \$63 million in relief.¹

2017 Filings and Settlements

On January 17, 2017, the United States filed a complaint in *United States v. KleinBank* (D. Minn.), a redlining case under ECOA and the FHA. The complaint, which was discussed in last year's report, alleges that, from 2010 to 2015, KleinBank's redlining practices denied residents of majority-minority neighborhoods an equal opportunity to apply for and obtain residential-real-estate-related loans, on account of the racial or ethnic composition of those neighborhoods. Specifically, the complaint alleged that KleinBank drew its service area in a horseshoe-shape that included the majority-white suburbs, and carved out the urban areas that have higher proportions of minority populations; it located all of its branch offices and mortgage loan officers in majority-white neighborhoods; it marketed its loan products to residents of majority-white neighborhoods, excluding majority-minority neighborhoods; and it generated relatively few applications from, and originated relatively few mortgage loans in, majority-minority areas.

The bank filed a motion to dismiss the case, arguing that the complaint did not sufficiently plead discriminatory intent, and further that due process precluded the Attorney General from bringing the case because the bank's prudential regulator, the FDIC, did not cite it for redlining during the bank exam process. The United States Magistrate Judge entered a report and recommendation to deny the motion to dismiss, concluding that the complaint's factual allegations established an inference of discriminatory intent and therefore satisfied the pleading obligations under ECOA and the FHA. The report and recommendation also rejected the bank's due process argument, finding that the Attorney General's independent authority to initiate an action under ECOA or the FHA is not dependent on a regulator's findings. The U.S. District Court adopted the report and recommendation and entered an order denying the motion to dismiss.

On May 8, 2018, the Division entered into a settlement agreement to resolve the case. Under the settlement agreement, KleinBank will ensure that its mortgage lending services are made available on a non-discriminatory basis and will expand its banking services in predominantly minority neighborhoods in the Minneapolis-St. Paul area in a variety of ways. The bank will expand its service area to include more of the majority-minority neighborhoods in the area; it will invest \$300,000 in a loan subsidy fund to increase the amount of credit that KleinBank extends to residents of predominantly minority neighborhoods; it will invest \$300,000 in advertising, outreach, financial education, and credit repair in order to improve the bank's visibility in, and successful expansion into, its new service area; it will open a new branch within a majority-minority census tract in its service area; it will employ a community development officer to oversee the development of the bank's lending in predominantly minority neighborhoods; and it will conduct fair lending training, including training on redlining, for its employees and officers.

¹ One of the 2017 settlements was *United States v. Union Savings Bank and Guardian Savings Bank*, which was filed in 2016; in addition, in early 2018, the Division settled *United States v. KleinBank* (D. Minn), discussed in the next section.

On January 18, 2017, the Division and the United States Attorney's Office for the Southern District of New York jointly filed a complaint in *United States v. JPMorgan Chase Bank, N.A.* (S.D.N.Y.). The complaint alleges that JPMorgan Chase violated the FHA and ECOA when it charged African-American and Hispanic borrowers higher rates and fees for wholesale mortgage loans than similarly situated white borrowers. On January 20, 2017, the court entered a consent order that settled the case. The consent order includes monetary relief of \$53 million, including a civil penalty of \$55,000.

On July 13, 2017, the United States filed a complaint in *United States v. Hatfield* (W.D.N.C.). The complaint alleges that Robert N. Hatfield, who rents, sells, and finances homes in Wilkes County, North Carolina, sexually harassed actual and prospective female residents and borrowers in violation of the FHA and ECOA. The complaint alleges that for over ten years Hatfield committed egregious acts of sexual harassment against multiple women who lived in or inquired about his properties. According to the complaint, Hatfield operated some of his properties as rentals, which he managed, and offered and provided financing to purchasers of other properties. The suit alleges that Hatfield's conduct included making unwelcome sexual comments and advances, engaging in unwanted sexual touching and groping, offering tangible housing benefits in exchange for sex acts, and taking or threatening to take adverse housing actions against women who object to his harassment. *Hatfield* is an example of the type of conduct targeted by the Division's Sexual Harassment in Housing Initiative, commenced in 2017. Litigation is ongoing.



Acting Assistant Attorney General
John M. Gore, Head of the Civil
Rights Division

The second settled case, which was discussed in more detail in last year's report, is *United States v. Union Savings Bank and Guardian Savings Bank* (S.D. Ohio). At the end of 2016, the Division filed a complaint and consent order alleging that two related banks had engaged in redlining of majority-African-American neighborhoods in Cincinnati, Dayton, and Columbus, Ohio, as well as Indianapolis, Indiana, in their mortgage businesses. The court entered the consent order, which included relief totaling \$9 million, on January 3, 2017.

Ongoing Discrimination Investigations

At the end of 2017, the Division had 22 open fair lending investigations covering a variety of issues.² The subject matters of these investigations include allegations of:

² As explained elsewhere in this report, the Division has independent authority to enforce ECOA and the FHA without a referral from another agency; in 2017 the Division opened some investigations independently and subsequently received referrals for the same lenders.

- Redlining discrimination, by providing unequal access to credit because of the racial or ethnic demographics of the neighborhood in which consumers live;
- Targeting of borrowers for predatory lending in home mortgages and rent-to-own schemes based on race or national origin;
- Discrimination in the financing of automobiles based on race, national origin or sex;
- Discrimination in underwriting of mortgage loans based on race or national origin; and
- Discrimination in the sale and financing of manufactured homes based on race or national origin.

III. SERVICEMEMBERS' LENDING ENFORCEMENT



The Civil Rights Division enforces a number of laws designed to protect the rights of members of the military, including the Servicemembers Civil Relief Act (SCRA). The SCRA provides for the temporary suspension of judicial and administrative proceedings and civil protections, in areas such as housing and credit, for individuals in military service, so that they can focus their full attention on their military responsibilities without adverse consequences for themselves or their families. The SCRA's benefits and protections include: a 6% interest rate cap on financial obligations that were incurred prior to military service; the ability to postpone civil court proceedings; protections in connection with default judgments; protections in connection with residential lease terminations; and protections in connection with evictions, mortgage foreclosures, and installment contracts, such as auto loans.

Enforcing these rights is an important priority of the Division. Members of the military who have made great personal sacrifices on behalf of this country should not return from military service to find their credit ruined, their cars repossessed, or their homes foreclosed on in violation of the SCRA.

Servicemembers and Veterans Initiative

Established in December 2014, the Servicemembers and Veterans Initiative ("Initiative") coordinates with Department components and other federal agencies to build a comprehensive legal support and protection network focused on servicemembers, veterans, and their families.

Outreach Efforts

During 2017, the Department has presented on the SCRA or the Initiative's work at 22 events nationwide. These events, attended by thousands of servicemembers and legal professionals, were held across the country, reaching all five branches of the military. High-ranking Department of Justice officials and other prominent figures attended a number of these events. For example, on April 11, 2017, Attorney General Jeff Sessions, along with Arizona Governor Doug Ducey, addressed servicemembers at Luke Air Force Base in Arizona. In February 2017, Tom Wheeler, then Acting Assistant Attorney General for the Department's Civil Rights Division, addressed servicemembers at the Naval Air Station Pensacola and the United States Air Force's Hurlburt Field in Florida. In October 2017, Josh Minkler, the United States Attorney for the Southern District of Indiana, delivered remarks on the Initiative and the SCRA at Camp Atterbury, the training base for the Indiana National Guard.



Members of the Civil Rights Division's Servicemembers and Veterans Initiative and the United States Attorney for the Southern District of Indiana meet with servicemembers at Camp Atterbury in Indiana.

Photo courtesy of Servicemembers and Veterans Initiative



Attorney General Jeff Sessions and Arizona Governor Doug Ducey speaking to Lt. Col. Michael Gette, former Commander, 61st Fighter Squadron, at Luke Air Force Base, Arizona.

Photo courtesy of Public Affairs, Luke AFB, Arizona

Filings Related to Illegal Auto Repossessions

An automobile is often a servicemember's most valuable asset and can be critical to the servicemember's and his or her family members' ability to get to work, childcare, and medical appointments. In certain circumstances, the SCRA requires lenders to obtain a court order before repossessing a servicemember's vehicle. The lender should determine whether a vehicle it is planning to repossess is owned by a protected servicemember. Lenders who fail to take this step, and repossess a protected servicemember's vehicle without a court order, are in violation of the SCRA. In 2017, the Department actively enforced this provision of the SCRA in the following filed cases.

On July 6, 2017, the Department entered into a settlement agreement that resolved *United States v. COPOCO Community Credit Union* (E.D. Mich.). The complaint, which was discussed in more detail in last year's report, was filed on July 26, 2016. It alleges that COPOCO violated the SCRA by repossessing protected servicemembers' motor vehicles without obtaining the necessary court orders. Under the settlement agreement, COPOCO must provide up to \$10,000 in compensation to affected servicemembers, plus any lost equity in the vehicle with interest. COPOCO also must repair the credit of all affected servicemembers, pay a \$5,000 civil penalty to the United States and implement new policies to comply with the SCRA.

On September 18, 2017, the United States filed a complaint and executed a settlement agreement in *United States v. CitiFinancial Credit Co.* (N.D. Tex.). The complaint alleges that CitiFinancial repossessed 164 automobiles between 2007 and 2010 from protected servicemembers without first obtaining court orders, in violation of the SCRA. During the investigation, the Department learned that CitiFinancial conducted repossessions without court orders even when CitiFinancial had evidence in its own records suggesting that a borrower could be a protected servicemember. The settlement agreement requires CitiFinancial to pay a total of \$907,000 in compensation to the servicemembers whose cars were illegally repossessed and to remove the repossessions from the servicemembers' credit reports.

On September 27, 2017, the United States filed a complaint and executed a settlement agreement in *United States v. Westlake Services, LLC* (C.D. Cal.), after the Bureau of Consumer Financial Protection's Office of Servicemember Affairs brought this matter to the Department's attention.³ The complaint alleges that from 2011 to 2016, Westlake and its subsidiary, Wilshire Commercial Capital, repossessed 70 vehicles owned by protected servicemembers without first obtaining court orders, in violation of the SCRA. Both companies targeted junior enlisted servicemembers for loans and products. The settlement agreement requires that Westlake and Wilshire pay \$700,000 in compensation to the servicemembers whose cars were illegally repossessed. Westlake and Wilshire also must repair the credit of all affected servicemembers, pay a \$60,788 civil penalty, and adopt new SCRA-compliant policies and procedures.

"The members of our armed forces should be able to devote their full attention to their duties without having to worry about whether their legal rights will be violated by creditors. We honor all servicemembers for their sacrifice and service to our nation, and this settlement signals our ongoing commitment to protecting the rights of our men and women in uniform."

Acting Assistant Attorney General
John M. Gore, Head of the Civil Rights
Division, Press Release for *United States
v. Westlake Services, LLC*

On November 14, 2017, the Department announced that it had obtained an additional \$5.4 million for 450 additional servicemembers under the October 4, 2016 consent order in *United States v. Wells Fargo Bank, N.A., d/b/a Wells Fargo Dealer Services, Inc.* (C.D. Cal.). This brings the total recovery in the case to over \$10.1 million for over 860 servicemembers. The complaint, which was filed on September 29, 2016, alleges that Wells Fargo repossessed motor vehicles between January 1, 2008 and July 1, 2015 from protected servicemembers without obtaining court orders, in violation of Section 3952 of the SCRA.

³ The agency was previously known as the Consumer Financial Protection Bureau, or CFPB.

The consent order requires Wells Fargo to compensate the victims of illegal repossessions, remove the repossessions from the victims' credit reports, pay a \$60,000 civil penalty, and institute new procedures to prevent unlawful repossessions in the future.

Filings Related to Illegal Home Foreclosures

The SCRA protects servicemembers and their families from property foreclosures without a court order. In 2017, the Department enforced this provision of the SCRA against a foreclosure trustee company for the first time in *United States v. Northwest Trustee Services, Inc.* (W.D. Wash.). The complaint alleges that the foreclosure services company violated the SCRA by foreclosing on at least 28 homes owned by servicemembers without obtaining the required court orders. The Department launched its investigation into Northwest's practices after United States Marine Corps veteran Jacob McGreevey of Vancouver, Washington submitted a complaint to the Department's Servicemembers and Veterans Initiative in May 2016. Northwest had foreclosed on Mr. McGreevey's home in August 2010, less than two months after he was released from active duty in Operation Iraqi Freedom. The Department's investigation revealed that, in addition to McGreevey, Northwest had unlawfully foreclosed on other SCRA-protected servicemembers since 2010.



IV. COLLABORATION WITH FEDERAL AND STATE PARTNERS AND OUTREACH TO STAKEHOLDERS

The Division continues its collaborative work with other federal partners, including in its participation in the Federal Interagency Fair Lending Task Force, where issues of relevance to fair lending enforcement are discussed. Those discussions often center on topics such as consistency in approaches among the Division and the other agencies, substantive discussions of issues that result in referrals to the Division, or investigatory issues that can arise across the various agencies, allowing the participants to benefit from other agencies' perspectives and experience.

As in prior years, Division representatives participated in conferences, training programs, and meetings involving lenders, compliance officials, industry experts, enforcement and regulatory agencies, consumer groups, and others interested in fair lending throughout the country, in order to inform critical stakeholders about the Division's enforcement activities. In 2017, Division staff participated in over a dozen outreach events focused on our fair lending and SCRA enforcement. For the seventh year in a row, the Division and all other federal fair lending enforcement agencies participated in a national webinar hosted by the FRB.

V. REFERRALS

Under ECOA, the bank regulatory agencies are required to refer matters to the Division when they have reason to believe a lender has engaged in a pattern or practice of discrimination. Referrals of lending matters are also made under ECOA by the FTC, and under the FHA by HUD and by regulators who share supervision of banks with assets over \$10 billion with the BCFP. From 2001 through 2017, the bank regulatory agencies, the FTC and HUD referred a total of 463 matters involving a potential pattern or practice of lending discrimination to the Justice Department. One hundred forty-five of those referrals involved race or national origin discrimination.

The Division received 12 ECOA and FHA lending referrals in 2017: two from the BCFP, four from the FDIC, three from the FRB, one from the OCC, and two from NCUA. The Division opened one investigation as a result of these referred matters.



As explained in prior reports, when the Division receives a referral from a bank regulatory agency, it must determine whether to open an investigation or defer the matter to the regulator for administrative enforcement. In December 2012, as part of our continuing effort to increase the effectiveness and efficiency of our fair lending enforcement, we made a new commitment to the regulators shortening our review time to 60 days starting with 2013 referrals. To date we have met our goal 100% of the time, including an average of 39 days to decision in 2017.

Factors Considered By DOJ When Evaluating Referrals

In 1996, upon the recommendation of the Government Accountability Office, DOJ provided a summary to the federal bank regulatory agencies on pattern or practice referrals. The summary described the factors that DOJ would consider in determining which matters it would return to the agency for administrative resolution and which ones it would pursue for potential litigation. The summary is posted on the Division's website at <https://www.justice.gov/sites/default/files/crt/legacy/2014/03/05/regguide.pdf>.

The Division considers numerous factors in deciding whether to retain or return a referral. As a general matter, referrals that are most likely to be returned have the following characteristics:

- The practice has ceased and there is little chance that it will be repeated;
- The violation may have been accidental or arose from ignorance of the law's more technical requirements; examples of such violations may involve spousal signature violations and minor price breaks for certain age groups not entitled to preferential treatment; and
- There were either few potential victims or *de minimis* harm to any potential victims.

As a general matter, the Division retains referrals that do not meet the criteria set forth above, and have one or more of the following characteristics:

- The practice is serious in terms of its potential for either financial or emotional harm to members of protected classes (for example, discrimination in underwriting, pricing, or provision of lender services);
- The practice is not likely to cease without court action;
- The protected class members harmed by the practice cannot be fully compensated without court action;
- Damages for victims, beyond out-of-pocket losses, are necessary to deter the lender (or others like it) from treating the cost of detection as a cost of doing business; or
- The agency believes the practice to be sufficiently common in the lending industry, or raises an important issue, so as to require action to deter lenders.

These factors are also applicable when DOJ has conducted an investigation and is making a decision whether the facts warrant a lawsuit.

2017 Referrals to DOJ

The 12 referrals in 2017 included the following types of alleged discrimination:

- 3 involving race or national origin;
- 5 involving marital status;
- 2 involving source of income;
- 2 involving sex;
- 1 involving age.⁴

As set forth in charts immediately following this report, the referrals involved various types of credit and a wide range of discriminatory conduct, including redlining, discriminatory underwriting, overt policies that discriminate on the bases of marital status and receipt of public assistance income.

As noted earlier, the Division opened one investigation from the 12 referrals in 2017. Additionally, at the end of 2017, we continued to investigate nine referrals received in prior years. Of those nine referrals, seven had been returned to the appropriate regulator for administrative enforcement by the time of this report.⁵ The two investigations that remained open at the end of 2017 involve race or national origin discrimination.

⁴ One referral involved more than one protected class; therefore, the number of referrals by protected class categories totals more than 12.

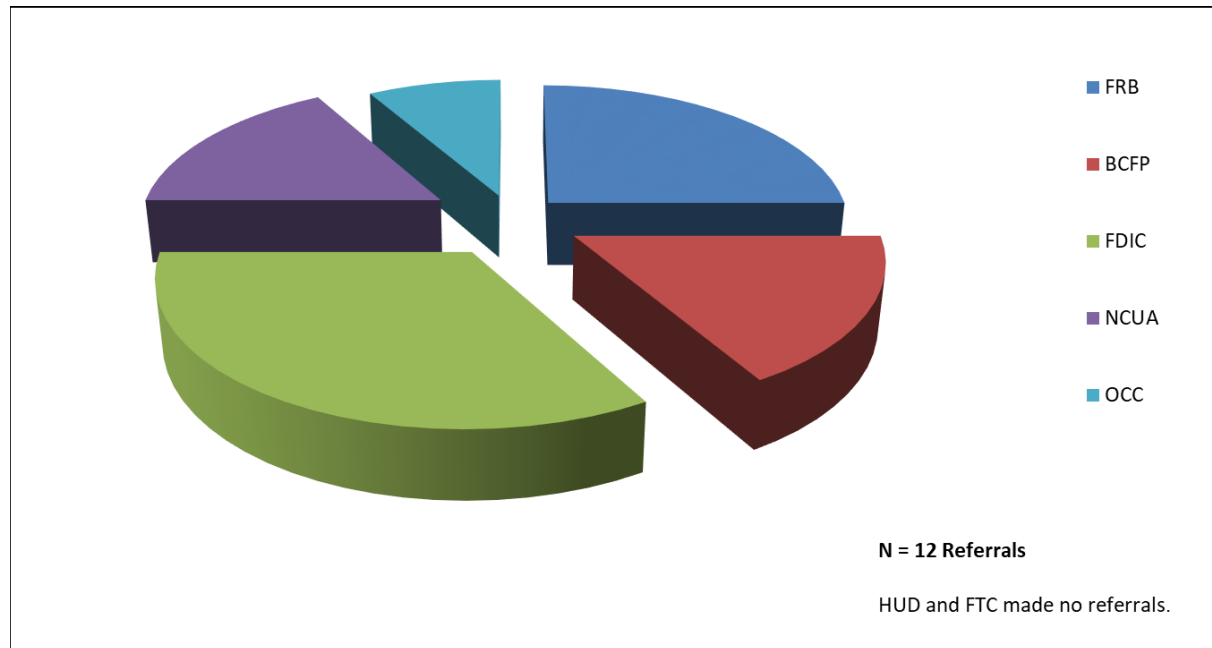
⁵ Since January 1, 2018, the Division received and returned one additional referral to the appropriate regulator.

For 11 of the 12 referrals in 2017, we returned the matter to the referring agency for enforcement without opening an investigation, including referrals where the referring agency specifically requested we defer to it for administrative enforcement. The referrals that were returned for administrative enforcement during 2017 are also described, by agency, in the charts following this report. For each of the referrals we returned to the agencies, the Division evaluated the facts and circumstances of the matter in light of the factors described above.

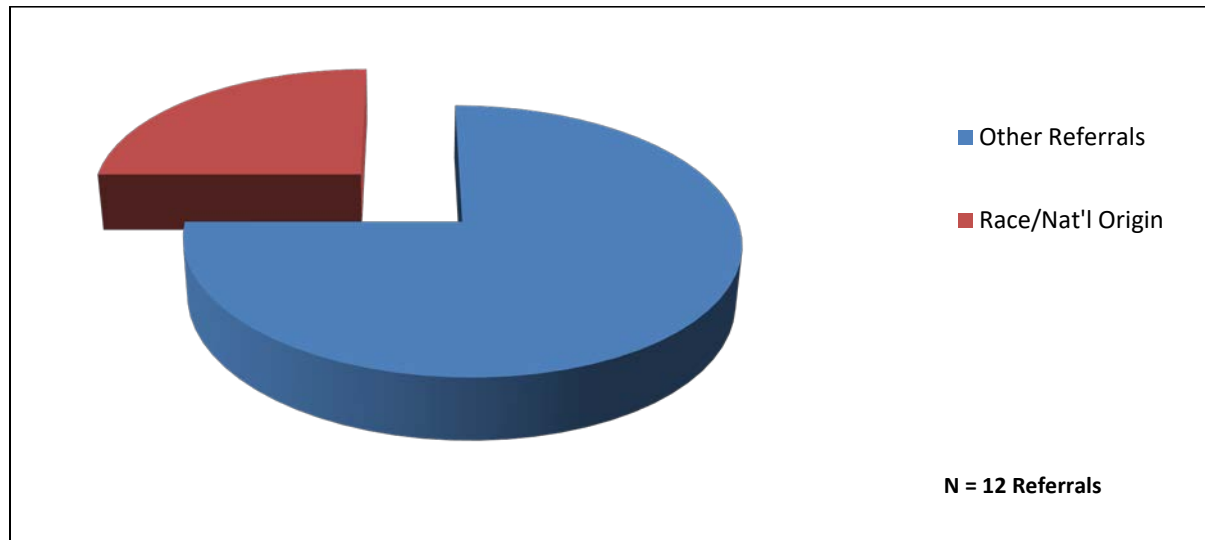
VI. CONCLUSION

In 2017, the Division vigorously enforced the fair lending protections of ECOA, the FHA, and the SCRA, and we will continue to protect the rights provided by those statutes through 2018 and beyond.

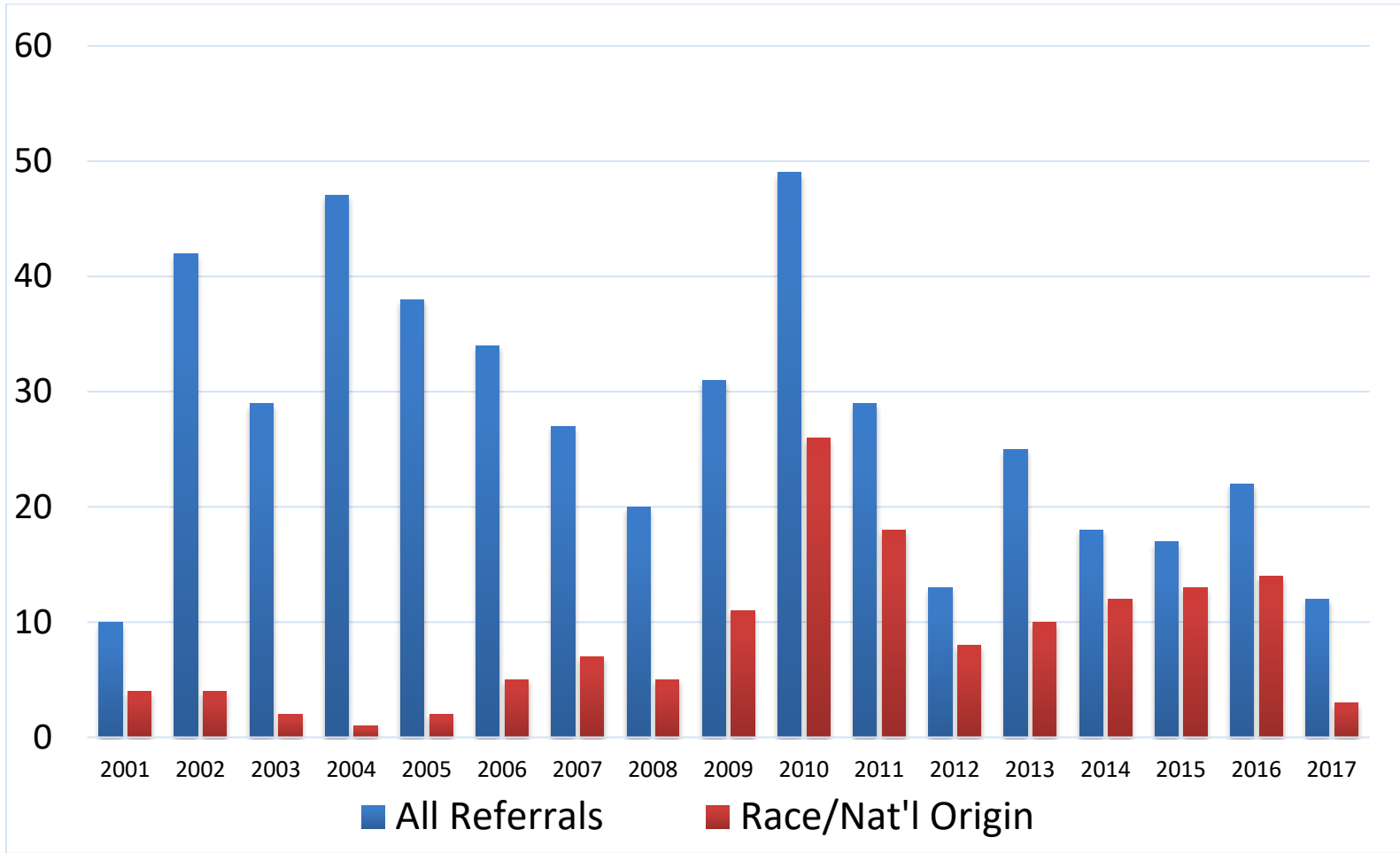
2017 Lending Referrals to DOJ by Agency






2017 Lending Referrals to DOJ by Protected Class



2001-2017 Fair Lending Referrals to DOJ







Lending Discrimination Referrals by Other Agencies to DOJ

Bank regulatory agencies	2017 Referrals by Protected Class	2017 Referrals Resulting in DOJ Investigations	2017 Referrals Returned to Agency	Referrals Pending from Prior Years as of December 31, 2017 ⁶
BCFP 	2 total 1 race/national origin 1 source of income	0	2 total 1 race/national origin 1 source of income	5 total 5 open investigations 4 race/national origin: auto lending 1 race/national origin/sex: auto lending
FDIC 	4 total 1 national origin 1 sex 1 age 1 marital status	0	4 total ⁷ 1 national origin 1 sex 1 age 1 marital status	3 total 3 open investigations 1 race: redlining 1 race/national origin: mortgage pricing 1 national origin: auto lending
FRB 	3 total 3 marital status	0	3 total 3 marital status	1 total 1 open investigation 1 race/national origin: pricing

⁶ As noted earlier, of these, seven were returned by the time of this report.

⁷ The Department returned one of these referrals for administrative enforcement action in early January 2018.

Bank regulatory agencies	2017 Referrals by Protected Class	2017 Referrals Resulting in DOJ Investigations	2017 Referrals Returned to Agency	Referrals Pending from Prior Years as of December 31, 2017
NCUA 	<i>2 total</i> 1 marital status 1 sex/source of income	<i>0</i>	<i>2 total</i> 1 marital status 1 sex/source of income	<i>0</i>
OCC 	<i>1 total</i> 1 race/national origin	<i>1 total</i> 1 race/national origin	<i>0</i>	<i>0</i>

Other partners	2017 Referrals by Protected Class	2017 Referrals Resulting in DOJ Investigations	2017 Referrals Returned to Agency	Referrals Pending from Prior Years
FTC 	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
HUD 	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>

2001-2017 All Lending Discrimination Referrals by Other Agencies to DOJ

ALL REFERRALS	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	Total
<i>Bank regulatory agencies</i>																		
BCFP*	2	8	8	15	6	1	0	—	—	—	—	—	—	—	—	—	—	40
FDIC	4	4	4	3	11	8	14	33	21	12	15	29	35	42	29	33	5	302
FRB	3	7	4	0	6	2	7	6	6	3	9	5	2	3	0	6	1	70
NCUA	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
OTS*	—	—	—	—	—	—	4	6	4	4	3	0	0	1	0	0	1	23
OCC	1	1	0	0	1	1	1	2	0	1	0	0	0	0	0	1	3	12
<i>Other partners</i>																		
HUD	0	2	1	0	1	1	1	2	0	0	0	0	1	1	0	2	0	12
FTC	0	0	0	0	0	0	2	—	—	—	—	—	—	—	—	—	—	2
Total	12	22	17	18	25	13	29	49	31	20	27	34	38	47	29	42	10	463

*On July 21, 2011, the BCFP (then known as the CFPB) launched and the Office of Thrift Supervision (OTS) merged into the OCC.

“—” indicates there is no entry for that agency in the ECOA report for that year.

2001-2017 All Race/National Origin Lending Discrimination Referrals by Other Agencies to DOJ

Race/Nat'l Origin	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	Total
<i>Bank regulatory agencies</i>																		
BCFP*	1	7	7	10	2	0	0	—	—	—	—	—	—	—	—	—	—	27
FDIC	1	2	3	2	5	5	10	14	5	2	1	3	1	0	2	1	2	59
FRB	0	3	3	0	3	1	2	4	3	0	4	0	0	0	0	1	1	27
NCUA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
OTS*	—	—	—	—	—	—	3	4	3	3	2	0	0	0	0	0	1	16
OCC	1	0	0	0	0	1	1	2	0	0	0	0	0	0	0	0	0	5
<i>Other partners</i>																		
HUD	0	2	0	0	0	1	0	2	0	0	0	0	1	1	0	2	0	9
FTC	0	0	0	0	0	0	2	—	—	—	—	—	—	—	—	—	—	2
Total	3	14	13	12	10	8	18	26	11	5	7	5	2	1	2	4	4	145

*On July 21, 2011, the BCFP (then known as the CFPB) launched and the Office of Thrift Supervision (OTS) merged into the OCC.

“—” indicates there is no entry for that agency in the ECOA report for that year.