

Page 2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver. of Interactive-WebShow: HMDA-LAR Public Disclostional Archives and Records Administration (NARA) Primary Interactive-WebShow Pages Detail Executive Complaint Complaint Complaint Complaint Complaint Complaint complaint Overview Summary One Two Three Four Five Analysis Supplementary Interactive-WebShow Pages HMDA-LAR Chase Racial Racial Disparity "Chase/SPS Absence of Eleventh-Hour Public Raw Data Discrimination/Racial Indicators FHA, VA, and Disclosures. **Profiling Practices**. FSA-RHS Loans Maneuver" **Executive Summary** 

2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver.

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Importance of the Home Mortgage Disclosure Act - Loan Applications Register (HMDA-LAR) Submission Process in Validating the Claim that JPMorgan Chase and Company Affiliates were Guilty of Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling and Conspiracy/Collusion to Hide Evidence from DOJ Investigator.

The validity and authenticity of the HMDA Database is beyond reproach because before updates can be added to the database they must be certified as being correct and error-free by an Officer of the Respondent Institution.

- More than eight thousand home mortgage lenders (known as Respondent Institutions) report their annual mortgage
  lending activities to the federal government's Home Mortgage Disclosure Act (HMDA) Database via Loan Application
  Register (LAR) public files. Each LAR public file submitted to HMDA is accompanied by a Transmittal Sheet (TS), which
  must certified and signed by an Officer of the Lending Institution. This TS certification assures that all mortgage loan
  applications contained in annual LAR submissions have been checked and authenticated for:
  - ☐ Validity error failures.
  - ☐ Quality error failures, and:
  - ☐ Validity and Quality failures.
- Annual LAR submissions containing with an error failure rate of more than ten percent must be returned to the lending institution, and re-submitted after error failures are corrected.
- Between 1999 and 2011, JPMorgan Chase and Company affiliates submitted their annual LAR submissions to their Supervisory: OCC, where they were authenticated and then sent to FFIEC, where they were incorporated into the HMDA Public Database residing on the ffiec.gov website. A permanent copy of the 1999-to-2011 HMDA Public Raw Data Database is stored in the federal government's National Archives at the National Archives and Records Administration (NARA)
- 4. After December 2012, JPMorgan Chase and Company affiliates submitted their annual LAR submissions to their Supervisory Agency: CFPB, where they were authenticated and sent to FFIEC, where they were incorporated into the HMDA Public Database residing on the ffiec.gov website. (CFPB maintains a shadow copy of the HMDA Database on their website at cfpb.gov.

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2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver.

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## STATEMENT OF CLAIM ONE:

2004 through 2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices by Employees of Multiple JPMorgan Chase and Company Affiliates.

The three principal operators of the clandestine Chase Non-Prime Lending Center were: Chase Manhattan Bank USA, National Association, JPMorgan Chase Bank, National Association, and Chase Home Finance, LLC.; however, during its first year of operation, the Chase Non-Prime Lending Center evolved into a parasitical subprime lending boiler-room, similar to those operated by Ameriquest, AIG FSB, GreenPoint, and WMC. This center was envisioned to be the source of all subprime and Alt-A home mortgage loans originated within JPMorgan Chase and Company, however, by the end of 2004, virtually all of the non-conforming home mortgage loans originated at this center were subprime mortgage loans. HMDA-LAR Raw Data Disclosures for twenty-one leading home mortgage lenders during this period, show that the major difference between the subprime loans originated at this center versus those originate at other subprime lending boiler-rooms, was that the Chase Lending Specialists manning this center employed blatant predatory lending, mortgage loan fraud, and racial discrimination/racial profiling tactics, and targeted African Americans, and other economically-disadvantaged consumers. The clandestine Chase Non-Prime Lending Center was so well hidden, that regulatory agencies, such as HUD, FDIC, DOJ; and OCC, that even today, these government agencies refuse to acknowledge that this subprime boiler-room ever existed. However, the HMDA Public Raw Data Disclosures obtained from the National Archives, show that the OCC, who had the fiduciary responsibility for reviewing, auditing, and approving annual LAR submissions from the Chase Manhattan Bank USA, N. A. (HMDA ID; 0000023160) allowed annual submissions from this center to be authenticated and placed in the HMDA database on the FFIEC.gov website, and the federal government's National Archives. Many, if not most, of the non-conforming home mortgage loans originated at this center were ultimately securitized into the fraudulent RMBS certificates, that became the genesis of the DOJ's landmark thirteen-billion-dollar Chase RMBS Lawsuit, which was settled on November 19, 2013. This \$13-billion settlement included a \$4-billion Consumer Relief Provision that the DOJ stipulated was to be used as follows:

JPMorgan will pay out the remaining \$4 billion in the form of relief to aid consumers harmed by the unlawful conduct of JPMorgan, Bear Stearns and Washington Mutual.

In an unprecedented move, JPMorgan Chase and Company (the defendant in this lawsuit) was named the sole administrator of this \$4-billion restitution/fine. Additionally, no government agency such as the CFPB, HUD, or the Housing and Civil Enforcement Section of DOJ, was designated to function as an oversight/monitoring role to ensure that this multi-billion dollar was distributed equitably. Predictably, this \$4-billion-plus restitution/fine was distributed to -123,737 anonymous property-owners but it does not appear that any were holders of home mortgage loans that were originated between 2004 and 2008 by the Chase Non-Prime Lending Division.

Source of Interactive-WebShow: HMDA-LAR Public Disclosur National Archives and Records Administration (NARA)

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2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver.

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## STATEMENT OF CLAIM ONE:

2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of by Quasi-Independent Chase Mortgage Brokers (aka: as Chase Lending Specialists). (Continued)

HMDA-LAR Public Raw Data Disclosures show that starting in 2004 and continuing until first-quarter 2008, JPMorgan Chase and Company subsidiaries, engaged in illegal discrimination/profiling practices within the Chase Non-Prime Lending Division of Chase Manhattan Bank USA, National Association HMDA Public Raw Data Disclosures show that although; a.) the number of conventional loan applications, b.) the number of originated home mortgage loans, and c.) the number of home mortgage loans originated at subprime/rute-spread rates, were inordinately high for African American consumers residing in the 20 of the 384 Metropolitan Statistical Areas/Metropolitan Divisions (MSAs/MDs); these disclosures show that African Americans residing in seven of these MSAs/MDs were specifically-targeted for illegal, 'ghetto-lending type" mortgage lending practices by teams of Chase Lending Specialists employed by the Chase Non-Prime Lending Division, (which at the time was unsanctioned by both FHA and HMDA). These teams of quasi-independent Chase Lending Specialists (aka: Chase Mortgage Brokers) were empowered to handle all aspects of the home mortgage loan origination process, including: Purchasing mortgage applicant leads and referrals from lead-generation scammers such as fax.com (who had been censured and indicted by the FTC for multiple FCPA violations).

Using bait-n-switch tactics to convince naïve, un	stioning loan applicants to apply for mortgage loans that would result in the highest
interest, fees, and Yield Spread Premium (YSP) b	

Creating home mortgage loan applications without the knowledge or participation of loan applicants: using false, manufactured, or highly-inflated information to ensure that the applicant met, or exceeded the lender's requirement for the

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□ Excluding co-applicants on applications, even though their income was required to pay the new mortgage payment, or even if the applicant was unemployed, and the co-applicant was the only one employed in the household.
 □ Submitting a second application of the same home mortgage loan, using a different member of Americans residing in selected MSAs/MDs did not exceed an imaginary quota, and drawing the scrutiny of HMDA regulatory authorities.
 □ Submitting annual 2004-2008 HMDA Public Disclosures under an affiliate's HMDA Respondent ID.

Although all home mortgage originations were reported to HMDA via the LAR submission process, Chase Lending Specialists had "no fear" of their illegal, premeditated predatory lending, mortgage loan fraud, and racial discrimination/racial profiling practices being exposed because after non-conforming subprime mortgage loans were originated and submitted to HMDA by Chase Manhattan Bank USA, N. A., they were then sold by that bank to a second National Bank: JPMorgan Bank, N. A. The hyproduct of this two-step home mortgage origination, removed all traces of the illicit origination tactics used by the Chase Lending Specialists, and the newly-cleansed home mortgage loans could be securitized into RMBS Certificates by a third affiliate of the JPMorgan Chase and Company.

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# STATEMENT OF CLAIM TWO:

The "Eleventh-Hour Maneuver" was a conspiratorial-collaboration between JPMorgan Chase Bank, National Association and Select Portfolio Servicing, Inc., to conceal the existence of thousands of Chase-originated, non-conforming home mortgage loans from Department of Justice Investigators during the settlement negotiations of the Chase RMBS Lawsuit. The end results of this unlawful action was that tens of thousands of owners of Chase-originated home mortgage loans were deprived of their rightful shares of the Four-Billion-Dollars Consumer Relief/Restitution Fine included in the settlement of the landmark Chase RMBS Lawsuit.

In October 2013, several hundred owners of residential property in which JPMorgan Chase Bank, N. A. (JPMCB) was the lienholder, received inconspicuous, unsigned form letters informing them that the servicing rights of their mortgage were being transferred to Select Portfolio Servicing, Inc. (SPS), effective November 1, 2013. This letter took great care in explaining to recipients, that the only the servicing of their mortgage was affected by this transfer; and included a caveat that stated: "This transfer does not affect any of the terms of your loan, other than the terms directly related to the servicing of your loan." In retrospect, the only thing regarding this letter that may have raised concerns was that; thereafter, all JPMCB communications regarding this transfer, referred to this letter as "The Good-bye Letter" and as it turns out, this is exactly what this letter was: "A Good-bye and Good-Riddance Letter", informing these recipients that JPMCB was "jettisoning their Chase-originated home mortgage loan. On November 19, less than three weeks after the outsourcing agreement went into effect, the Department of Justice (DOJ) announced that it had reached a settlement of its landmark lawsuit against JPMorgan Chase and Company (JPMCC), in the largest fraud lawsuit in US history against JPMCC. The settlement of this lawsuit, which was named: Chase RMBS Securitization Lawsuit, levied an unprecedented, thirteen billion dollar fine against JPMCC, of which four-billion-dollars was to be used as consumer relief for consumers who had been harmed by the actions of JPMCC, Bear Sterns, and Washington Mutual Bank. The net effect of this clandestine, "Eleventh-Hour Maneuver" is that it deprived mortgage holders of the tens of thousands of Subprime and Alt-A home mortgage loans originated between 2004 and 2008, by the Chase Non-Prime Lending Division of their rightful share of the four-billion-dollar consumer relief/restitution including in the Chase RMBS Lawsuit Settlement. Additionally, and even more sinister and disturbing, was the fact that JPMCB had jettisoned these tainted home mortgage loans during the aforementioned, "Eleventh-Hour Maneuver", JPMCC was able to represent itself to DOJ "as having Clean Hands", and that its only transgression, was purchasing "Toxic Mortgages" from WMC Mortgage Corporation, GreenPoint Mortgage, and Countrywide Mortgage. This "Clean Hands" defense was so successful, that the settlement of this lawsuit named JPMCC as the sole administrator of the four-billion-dollar Consumer Relief/Restitution Fine of this Settlement; and thus, the DOJ naming JPMCC as the sole administrator of this consumer relief/restitution, was the same as "Allowing Fox Guarding the Hen-House"

## STATEMENT OF CLAIM TWO: (Continued)

The "Eleventh-Hour Maneuver" was a conspiritial colaberation between JPMorgan Chase Bank, National Association and Select Portfolio Servicing, Inc., to conceal the existence of thousands of Chase-originated, non-conforming home mortgage loans from Department of Justice Investigators during the settlement negotiations of the Chase RMBS Lawsuit, The end results of this unlawful action was that tens of thousands of owners of Chase-originated home mortgage loans were deprived of their rightful shares of the Four-Billion-Dollars Consumer Relief/Restitution Fine included in the settlement of the landmark Chase RMBS Lawsuit.

Although SPS, Inc. did not participate in any of the criminal practices performed by Chase Lending Specialists during the origination of the non-conforming home mortgage loans, on behalf of the Chase Non-Prime Lending Division; there is an overriding, and as yet manswered, question regarding the SPS involvement in the "Eleventh-Hour Maneuver"; this question is: "What Did SPS Know; and, When Did SPS Know 11?" It is clear, that in June 2015, when the question regarding the requirements for owners of Chase-originated abundantly home mortgage loans was asked, and multiple SPS employees of the Ombudsman's Office and the SPS Consumer Advocate's Office denied any knowledge of the RMBS Lawsuit settlement agreement, that these SPS employees repeatedly, and blatantly, lied to James Barnes and Susie Barnes about the SPS involvement in this criminal conspiracy. It is now clear that in 2016, 2017, and 2018, when the James Barnes and Sue Barnes filed formal consumer complaints regarding this matter were filed with both OCC and CFPB, that SPS employees were thoroughly familiar with SPS's involvement in the "Eleventh-Hour Maneuver". Below is an excerpt from the Consumer Relief Provision of RMBS Lawsuit Settlement Agreement, and it clearly states that the S4 billion contained in this settlement is to be used "to remediate harms allegedly resulting from unlawful conduct of JPMorgan, Bear Stearns and Washington Mutual".

### Consumer Relief/Restitution Settlement of Chase RMBS Lawsuit:

JPMorgan shall provide \$4 billion worth of consumer relief as set forth in 1Annex 2, attached and hereby incorporated as a term of this Agreement, to remediate harms allegedly resulting from unlawful conduct of JPMorgan, Bear Stearns and Washington Mutual. The value of consumer relief provided shall be calculated and enforced pursuant to the terms of Annex 2. An independent monitor will be appointed to determine whether JPMorgan has satisfied the obligations contained in this Paragraph (such monitor to be the current monitor for the National Mortgage Settlement, hereinafter the "Monitor"), and any costs associated with said Monitor shall be borne by JPMorgan.

Based upon the above statement from the settlement agreement, it is clear that the DOJ intended that this \$4 billion fine be used to provide "restitution" to remediate the harm caused by JPMorgan Chase and Company affiliates, such as the Chase Non-Prime Lending Division, Chase Manhattan Bank USA, N. A., JPMorgan Chase Bank, N. A., and Chase Home Finance, LLC; and the illegal "Eleventh-Hour Maneuver" circumvented this summary judgement.

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2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Loan Lending Practices of Chase Non-Prime Lending Center, and "JPMCB/SPS Eleventh-Hour Maneuver".

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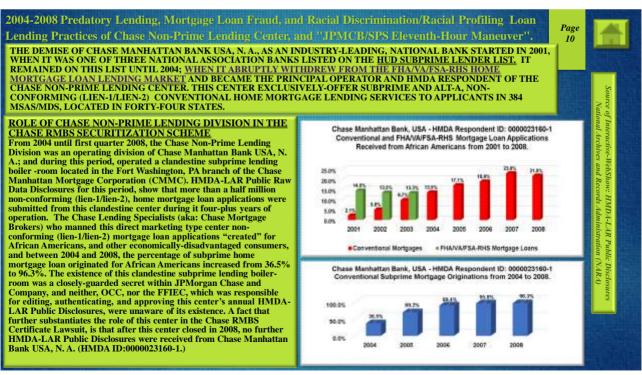
2004-2008 Chase RMBS Inverted-Pyramid Securitization Scheme JPMorgan Chase and Company Affiliates and Business Partners. Clear Non-Prime Leading Division (~ \$29.2-Billion) Char D'Pt, LLCs, LLPs, in WMC.Groundated Conforming and Non-Conforming Hump Mortgage No. - Loans Originated and Sold to JPMCB. JPMurgan Chose Block, N. A. (JPMCB) Mortgage Laune to be Securitized into November 1, 2013 Eleventh-Bour Toxic Transpirit Martgage Jeffmaning Private JPMorgan Aquistion ( (JPMAC) 1986 of Clear-Originated "Tree Mortgages" in RMSS Corolleans p. to at at a Prospectus for Sale of RSBB Certificates Franchis of RMBS: JPMAC 2007-CHI 0 0 0 JPMAC 2007-CHI JPNIAC 2005-CHI - JPNIAC 2005-CHS TO JE SET OF HE Tes, CU Affiliate Other Hortgage, (authorizing Purchaser) Farmer Private Sansstors

# Role of Chase Non-Prime Lending Division in the Chase RMBS Securitization Scheme

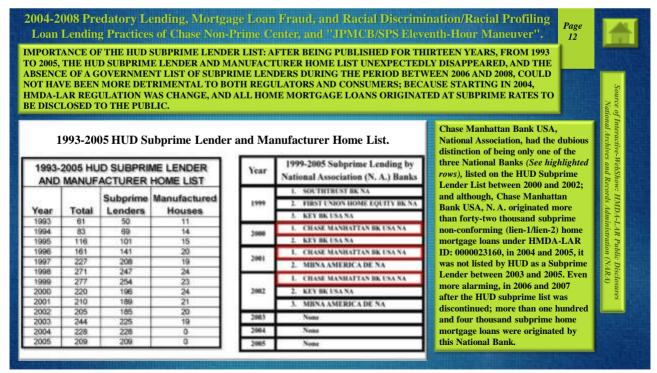
The Chase Non-Prime Lending Center was manned by teams of quasi-independent Chase Lending Specialists, aka: Chase Mortgage Brokers. HMDA-LAR Public Raw Data Disclosures show that this center was a primary source of the Non-Conforming (Lien-1/Lien-2), conventional home mortgage loans for the Chase RMBS Securitization Scheme. Between January 2004 and March 2008, more than five hundred thousand home mortgage loan applications were processed by this center, and more than two hundred thousands of these, subprime and Alt-A home mortgage applications were originated into mortgage loans by the principal operators of this center. These principal operators: Chase Manhattan Bank USA, N. A., JPMorgan Chase Bank, N. A. (JPMCB), and Chase Home Finance, LLC. (12th largest subprime lender in the US; and successor to Chase Manhattan Mortgage Corporation), utilizing a unique, two-tier home mortgage origination scheme predicated on non-conforming home mortgage loans originated at this center; and then during the same calendar year, being "sold" to an affiliate: JPMCB. A flaw in the HMDA-LAR Disclosure process, enables home mortgage loans sold during the same year in which they are originated, to be "eradicated" of all characteristics identifying them mortgage loans originated as subprime and/or Alt-A mortgage loans. These newly sanitized home mortgage loans can then be securitized into RMBS Certificates along with conforming home mortgage loans.

urce of Interactive-WebShow: HMDA-LAR Public Disclosures
National Archives and Records Administration (NARA)



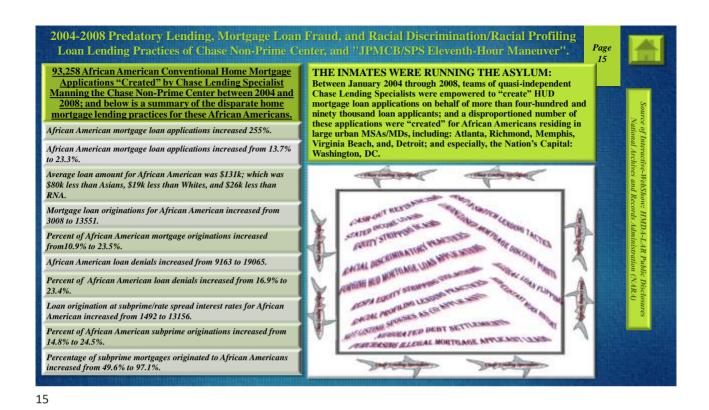




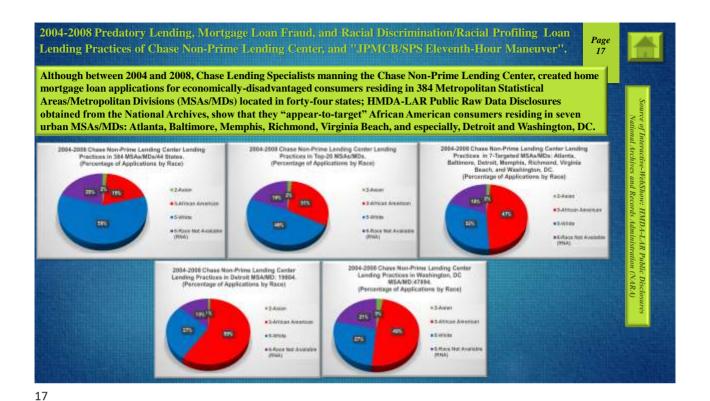


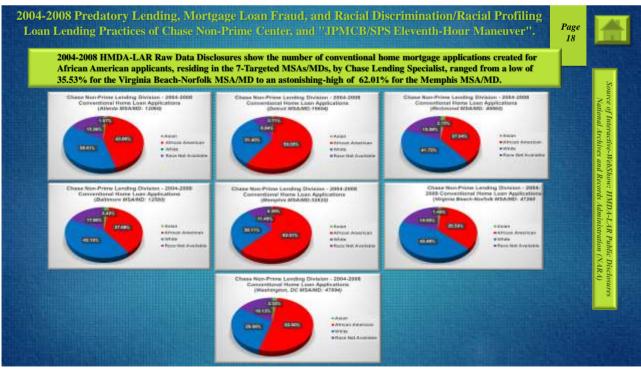


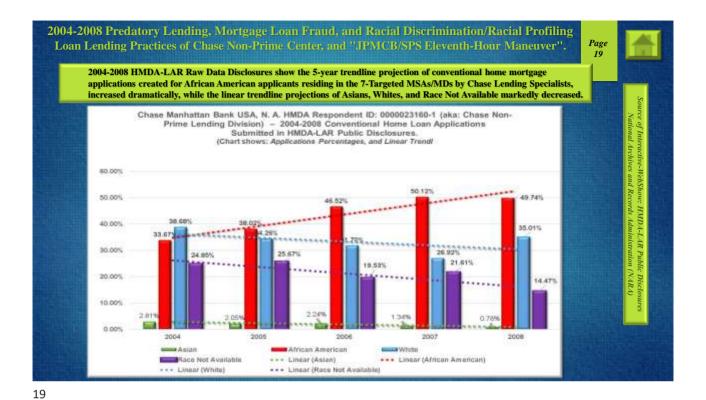
2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Page Loan Lending Practices of Chase Non-Prime Center, and "JPMCB/SPS Eleventh-Hour Maneuver". CHASE SUBPRIME HOME MORTGAGE LOANS NOT INCLUDED VIA HMDA-LAR PUBLIC DISCLOSURES: Chase Home Finance, LLC., was a wholly-owned LLC of JPMorgan Chase and Company from 2005, until it merged with JPMorgan Chase Bank, N. A. in 2011. Shortly after it was formed in 2005, it acquired Chase Manhattan Mortgage Corporation (CMMC), and its fifty-two, nationwide branches. After the CMMC acquisition in 2005, a WSJ report listed CHF as the twentyfirst largest subprime lender in the nation. Subsequently, it was ranked at the seventeenth largest subprime lender in 2006, and the seventh largest subprime lender in 2007. TopTwenty Subprime Lenders from 2005 through 2007 Rank 2006 - Top Twenty Subprime Lenders 2005 - Top Twenty Subprime Lenders 2007 - Top Twenty Subprime Lenders erquest Mortgage, s ourtrywde Firencial, Call New Century Financial, Cult New Century Fittericial, Call HSBC Finance, II Countrywide Financial, Cald guntrywide Financial, Cati Aleils Forge Home Mortgage, lowe introduces, N. 9 Wells Furgo Home Mortgage, lows HMDA-LAR Public ords Administration ( inst Franklin Financial Corp., Calif. \$1296 WMC Mongage, Calif WMC Mongage, Calif. \$33,16 550%. Framont Investment Samp, Loan, Calif. \$32,30 5,40%. Option One Montgage, Call Sption One Mortgage, C Fremont Investment & arrip; Lean., Calif \$29.50 4,90% Washington Musual, Wash \$36.10 5.401 Ameriquest Mongage, Calif \$29.79 4.90% \$27.07 4.90% \$27.07 4.90% EMC Morgage Corp. Texas \$7.84 4.40% Option One Mongage, Calif First Franklin Financial Corp., Calif. GWAC-RFC, Mirro. \$29.33 4.409 \$25.26 3.609 BNC Mortgage, Colf 3.70% Wally Fargs Home Montange, lows' 3.80% First Franktin Financial Corp. Culf. Anenguest Mortgage, Calif Mortgage Se 40 \$70.00 4 40% \$21.20 3.50% \$17 2.00% \$15.77 2.00% \$15.77 2.50% \$15.70 2.30% WMC Mortgage, Calif American General Finance, Ind Wishington Mutual, Wish \$24.00 3.609 Westergton Mutual, Wests \$5.50 5 10% Residential Funding Corp., Minn Cit-Financial, N.Y. Disclosure 13 Decision One, III. HSBC: Coteamer Lending, III. VMC Morgage, Calf 280% Aegis Mortgage Corp. Texas. 2509 14 \$16.65 \$16.58 New Century Financial, Call \$4.70 2.60% Accoudted Home Lenders, Calif. 2.40%, American General Finance, Ind. Aegis Mortgage Corp., Texes Accredited Home Lenders, Calif 16 Residential Capital LLC BNC Mortgage, Calif BIVC Mortgoge, Calif 17 Equifirst No \$3.80 edis Mortgage Corporation, Texas \$14.85 Accredited reserved. Sexon Mortgage, Vis. Accredited Horrer Lenders, Calif. \$3.53 | 2.00% | Equitist, N 1.80% ECC Capital Corp., Calif. \$14.02 | 2.309 19 \$3.50 200% NovaStar Financial, Karsus \$3.40 1.90% Ownit Mortgage Soldism. C Emanos America, N.Y. 20 \$513.69 74.70% Total for Top 29 Lenders \$573.91 Total for Top 20 Lenders \$169.80 89.30% Total for Top 20 Landem Chase Home Finance, N.J. \$9.85 1.50%



2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Page Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver. The following table includes a summary of the 2004-2008 HMDA-LAR Public Raw Data Disclosures for Respondent Institution 0000023160, for 284 MSAs/MDs, Top-20 MSAs/MDs, Targeted-7, Detroit MSA/MD, AND Washington, DC MSA/MD. The key fields in this table are the percentage of applications "created" for African Americans residing within each MSA/MD category. This percentage range from 19% for applications "created" for African American residing in all 384 MSAs/MDs, up to 41.1% for African Americans residing in the seven urban MSAs/MDs, specifically-targeted by Chase Lending Specialists. This table shows that African American consumers residing in the MSAs/MDs of Detroit and Washington, DC, had an even higher percentage of home loan applications "created" by Chase Lending Specialists. HMDA-LAR Public Disclosures for 2004-2008 Chase Non-Prime Lending Center (Respondent ID: 0000023160) Top 20 MSAs MDs B4 MSAs MOs HMDALLAR RI Loan Originate d 35145 21527 Accepted but not Accepted 1538 541 1.1% 193 0.9% 0.7% 0.9% 69.9% 27711 66.3% 68.01 3363 62.7% 2460 47.2% Denied by Institution 55870 12191 653 0.7% 0.7% 0.7% 34 0.6% 26 Withdrawn by Applicant 330 162 0.5% Closed for Incompleteness 22 0.0% 14 0.1% 52 0.1% 0.1% 4 4 0.15 Total Applications 93258 100.0% 50131 100.0% 21006 100.01 6344 100.01 6209 100.01 Percentage of Applications 19.0 1651 166 Average Loan Amount (\$000) 141 79 6B Total Loan Amount (\$000) 4962777 3220422 1249114 150798 579957 Average Income of Applicant (\$000) 65 68 72 68 Number of Subprime Loans 30552 18541 7197 1966 1903 Percentage of Subprime Loan 86.1% 85.1% 96.8% 86.9% 71.2% Subprime/Rate Spread Interest 5.1% 5.3% 5.3% 5.8% 4.9% 74.3% 77.7% 78.21 71.11 No Co-Applicants 66370 37337 15760 4693 3661 Percent of Co-Applicants 22925 25.7% 10690 22.3% 4405 21.81 609 11.7% 1449 28.91 Male without Co-Applicants 47.2% 17164 45.23 7767 48.01 2473 62.81 1501 41.41 Female without Co-Applicants 35888 19953 52.01 2211 47.2% 2121 58.61 rces: HMDA LAR Pable Declarates



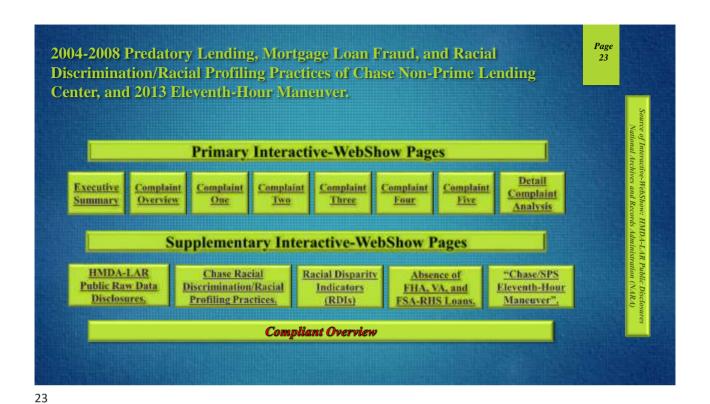








2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Page Loan Lending Practices of Chase Non-Prime Center, and "JPMCB/SPS Eleventh-Hour Maneuver". 2004-2008 HMDA-LAR PUBLIC RAW DATA DISCLOSURES FOR TWENTY-ONE MAJOR LENDERS WERE OBTAINED FROM THE FEDERAL GOVERNMENT'S NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA) ARCHIVES. 1999-2088 HMDA-LAR Public Disclourses Conventional Loans Originated by Chase-Birnel Non-Prime Division, Chase Manhattan Bank USA, N. A. (aka: Chase Bank USA, N. A.), JPMorgan Chase Bank, N. A., and affiliates and JVPs; pon Somewice of BMB+LAR of Interactive-WebShow: HMDA-LAR Public ational Archives and Records Administration ( Number of Percentage of Conventional Home Originated HMDA Mortgage Loan Applications Received from Major Racial Categories. Subprime/Non Conforming HMDA-LAR Name HMDA Respondent Institut included in Analysis. Respondent ID, and Home Loan Originated Asian African White Race Not Home Mortgage Leans, (and % Period. Supervisory Agency ID. Originated) Periods. 0000023160-1 51.4% Chase Manhattan Bank USA, N. A. 210,660 0.8% 38,2% Chase-Direct Non-Prime Division 2004-2008 195,572 72,898 (78,9%) 1.9% 18,7% 64.1% 14.0% Chase-Direct Non-Prime Division 2005-2007 73,972 1.8% 14.0% 54.1% (Top-20 Specifically-Targeted MSAvMDs) Chase Bank USA, N. A. 2005-2009 Liki Uneveilable\* N/A N/A N/A Name (Nate 2) NIA JPMorgan Chase Bank, N. A JPMn Chase Bank, N. A 2005-200 0000000008 -1 428,651 16.887 (5.7%) 66,7% 14.6% (Top-20 Specifically-Surgeted MSAvMIn) 1999-2003 Chase Manhattan Mortgage Corp 8,853 (2.2%) Chase Home Finance, LLC 2005-2011 No Respondent (umber) N/A o LARs Subou NIA N/A ic Disclosures (NARA) Charvalishie\*\* N/A Chase Home Finance (Subsidiary) 2012-2015 Chase Joint Venture Partnerships Bank One, OH Bank One, IL Bank of America, N. A 2006-2005 172 (3.4%) 6666607621-2004-2000 58.883 (2.8%) 0000013844.1 2.036.730 8.450 78.0% 11,456 7.79 Wells Furge Bank, N. A. 2004-2000 0000001741-1 2,317,588 264,495 (11,4%) 4,9% 7,3% 77,7% 9,0% 2005-2007 2006-2007 2005-2007 2005-2007 0000008851-4 2276200003-7 0000024141-1 0458600405-7 Washington Mutual Bank 1,385,260 74,932 (5.4%) 67,3% 17,6% 43,986 565,525 294,999 Bear Stearns Countrywide FSB WMC Mortgage Corp Greenpoint Mortgage F 27,836 (63.4% 72.2% 43.7% 2004, 2008 13-3210378-3 519.75 9.2% 252,615 167,312 (66.2%) 48,4% AIG FSB 2004-2007 0000014939 164,759 92,140(55,9%) 2.3% 59.2% ns Origin 13,309,490







2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Page Loan Lending Practices of Chase Non-Prime Center, and "JPMCB/SPS Eleventh-Hour Maneuver". COMPARISION OF 2004-2008 SUBMISSION ERROR RATES IN ANNUAL HMDA PUBLIC REPORTING FOR CHASE MANHATTAN BANK USA, N. A. AND BANK OF AMERICA, N. A. (ALLOWABLE ERROR RATE: 10%) 2004-2008 Chase Manhattan Bank USA, N. A. - Submission Error Rates 2004-2008 Bank of America, N. A. - Submision Error Rates HMDA-LAR Public Raw Data Disclosures (Per HMDA-LAR Public Raw DataDisclosures (Respondent ID-1000013846-1) Applications (I) Action Falco Code (II) 2001 Mortgage Loan Applications Humber Quality Edit Falker Errors plications 🕹 | Action-Tiern Date 🗣 High gegy Lown Applications umber Quality Edit Feiure Droom 948% 602% 71.0% 836% 4 3 3 4 5 5 Total 419328 87980 111387 2963 2968 14008 744291 98786 8706 11486 403 718 162 81291 Applications V 1 2006 Mortgage Loan Applications Humber Quality Edit Fallare Errors 47186 1312 66667 978 205 42261 1168 54689 972 179 004 Mortgage Loan Applications Sumber Quality Edit Feliure Errors centage of Quality Edit Feitures ercentage of Quality Edit Failures 43770 85031 121404 3074 3008 132312 424770 85031 121404 3074 3008 132312 42407 7243 8538 453 660 671 2395 84% 8538 11.2% 15076 03% X Middgege Loan Applications either Quality Edit Feiture Stron 2006 Mortgage Loan Applications Humber Quality Edit Faltare Errors entage of Quality Edit Pallures 10.25 10.95 54.95 83.75 T0.95 contage of Quality Edit Falures 1967 Mortgage Loan Applications Number Guality Edit Failure Errors 430090 107611 168549 6166 42407 7243 6336 433 OT Writings Lown Applications 58279 18K7 82788 1796 1 44K48 inter Quality Edit Feiture Errors 00.1% 80.3% 86.7% 81.1% 07 recentage of Quality Edit Failures 4122 125 6784 60 1 2 3 4 5 8 Total 314308 43934 146938 45934 11908 19888 **5798**8 2948 Mortgage Loan Applications 5904 Mod gage Loan Applications under Qualty Edit Feiture Errors 2533 100 8256 58 35.7% 04.5% 85.1% 82.1% 26371 5446 7578 1988 502 92% 12.5% 5.7% 4.4% 4.2% anber Quality Edit Falker Errors Percentage of Quality Edit Failures Percentage of Quality Edit Feluros







2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Page Loan Lending Practices of Chase Non-Prime Center, and "JPMCB/SPS Eleventh-Hour Maneuver". HMDA-LAR PUBLIC REPORTS ARE SUMMARY OF APPLICATIONS BY YEAR WITHIN STATISTICIAL METROPOLIAN STATISTICAL AREAS/METROPOLIAN DIVISIONS (MSA/MD), HOWEVER , HMDA-LAR PUBLIC RAW DATA DISCLOSURES INCLUDED THIRTY-EIGHT MEASURABLE DIMINISIONS FOR EACH APPLICATION CONTAINED IN THE HMDA DATABASE. of Interactive-WebShow: HMDA-LAR Public Disclos ational Archives and Records Administration (NARA) Top-10 HMDA-LAR Public Raw Data Dimensions Recini Cutegories (Asian, African American, White, and Race Not Available, with MSAs/MDs, States, or Census Tracts.) VALUE OF HMDA-LAR PUBLIC RAW DATA DISCLOSURES 1-Mortgage Originated HMDA reports are available on the ffiec.gov 2-Application Approved but not Accepted. website, and provide regulators and consumers **ACTION-TAKEN CODES:** with a variety of predefined home mortgage 3-Denied by Institution. lending reports by national aggregate, 4-Application Withdrawn by Applicant. MSA/MD, state, and other geographic 5- File Closed for Incompleteness. dimensions; but unfortunately, these reports Total Applicants rarely provide the level of granularity or specificity required for analyzing HMDA-LAR LOAN APPLICATIONS: Percentage Applications. disclosures at the individual applications level, such as annual HMDA-LAR submissions by racial categories within SNA/MD, state, census 3 AVERAGE LOAN AMOUNT (\$000): 4 LOAN VALUATION (\$808) 5 AVERAGE INCOME OF APPLICANT (\$000): tract, or other geographic dimensions. The Number of Subprime Loans graphic on the left of this page is an illustrative example of how the data fields contained in the SUBPRIME HOME Percent of Subprime Loans. MORTGAGE LOANS: Average Rate Spread/Subprime Rate of Loans HMDA-LAR Public Raw Data Disclosure LOAN APPLICATIONS WITH CO-APPLICANT: record, can be used to provide regulators and consumers with detail, application-level LOAN APPLICATIONS WITH NO CO-APPLICANT: **HMDA-LAR dimensions** MALE APPLICANTS WITH NO CO-APPLICANT 10 FEMALE APPLICANTS WITH NO CO-APPLICANT:

2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Loan Lending Practices of Chase Non-Prime Center, and "JPMCB/SPS Eleventh-Hour Maneuver".

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# COMPLAINTS BY JAMES AND SUSIE BARNES AGAINST JPMORGAN AND SPS, INC:

**Description of Complaints and Applicable Violations:** 

- Complaint One: Predatory Lending, Mortgage Loan Fraud, Racial Discrimination/Racial Profiling crimes against Susie Barnes by Chase Lending Specialists employed by the Chase Non-Prime Lending Division. Susie Barnes' claims, buttressed by government-certified HMDA-LAR Public Disclosures, were initially filed directly with CHASE in 2011, and during 2014/2015 filed with federal civil rights and fair housing agencies including: FDIC, OCC,, HUD, and DOJ. All of these federal agencies refused to accept jurisdiction for this complaint, and referred it to the "so-called" Consumer Financial Protection Bureau (CFPB), where it was summarily; and arbitrarily, closed without review, appeal, or escalation. 2004-2008 HMDA-LAR Public Disclosures show that the home mortgage loans of tens of other thousands of African Americans, were originated under the same fraudulent; and frequently, felonious practices. (Violations: Fair Housing, FHA, ECOA, Civil Rights Act, HOEPA, RESPA
- Complaint Two: Principal Operators of the Clandestine Chase Non-Prime Center, including two National Association Banks: Chase Manhattan Bank USA, N. A. and JPMorgan Chase Bank, N. A., submitted fraudulent and misleading HMDA-LAR Public Disclosures to FFIEC and OCC, that including fraudulent, (bank-officer-certified), transmittal sheets containing: LARs riddled with ~ 90% validity and quality edit errors, LARs with wrong bank name, LARs with duplicate applications; and most importantly, LARs without application detail from which HMDA regulatory-agency and public reports could be generated. These annual fraudulent HMDA-LAR disclosures were used to avoid the regulatory scrutiny of FFIEC, HUD, DOJ; and particularly OCC, (which was its HMDA-CRA Supervisory Agency for this clandestine subprime lending boilerroom for more than five years). (Violations: Regulation C, Civil Rights Act, TCPA, Fair Lending, FHA)
- Complaint Three: Chase Non-Prime Lending Division, and its principal operators Chase Manhattan Bank USA, N. A. and JPMorgan Chase Bank, N. A., encouraged and sanctioned illegal, discriminatory home mortgage lending practices against tens of thousands of African Americans from 2004 to 2008. Viola ons: Chase 2007 Fair Housing Policy, Civil Rights, ECOA, FHA)
- Complaint Four: Quasi-Independent Mortgage Brokers (aka: Chase Lending Specialists), manning the Chase Non-Prime Lending Center were guilty of explicitly-targeting African American citizens residing in twenty urban MSAs/MDs, such as Detroit and Washington, DC. (Illegal acts included purchasing home mortgage applicant referrals from notorious, FTC-indicted lead-generator: fax.com; and illegal equity-stripping scams, mortgage loan flipping, originating multiple home mortgage loans to same applicant(s) during the same calendar year) (Violations: ECOA, FHA, Civil Rights Act, Fair Housing, HOEPA, RESPA, TCPA,

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2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Loan Lending Practices of Chase Non-Prime Center, and "IPMCB/SPS Eleventh-Hour Maneuver".

# COMPLAINTS BY JAMES AND SUSIE BARNES AGAINST JPMORGAN AND SPS, INC.

Description of Complaints and Applicable Violations (Continued):

Complaint Five: "Eleventh-Hour Maneuver"- JPMorgan illegally-concealed the existence of than one hundred thousand nonconforming subprime and Alt-A home mortgage loans from DOJ Investigators during 2013. These "Toxic Mortgages" were originated at the Chase Non-Prime Lending Center between 2004 and 2008. The Statement of Facts document released by the DOJ, JPMorgan admitted to investigators, that it unknowingly purchased "Toxic Mortgages" from known subprime lenders, such as WMC Mortgage Corporation; however, it concealed the fact that it also purchased more than two-hundred-thousand non-conforming mortgage loans, with an evaluation of almost twenty-nine billion dollars from it's affiliate: Chase Non-Prime Lending Division. Thirty-three days before DOJ announced the settlement of the Chase RMBS Securitization Lawsuit, JPMorgan illegally outsourced/jettisoned tens of thousands of these Chase-originated "Toxic Mortgages" to its business partner: Select Portfolio Servicing, Inc., in a ploy referred to as the "Eleventh-Hour Maneuver". This illegal act likely caused the Mortgagor of these Chase-Originated "Toxic Mortgages" to lose their rightful shares of the Four Billion Dollar Consumer Relief/Restitution Settlement of this Lawsuit. When the Mortgagor of one of these loans, attempted to obtain her rightful share of the consumer relief award, the Chase Home Office Support Staff of JPMorgan (and the SPS Ombudsman's Office), "deliberately lied" about their previously-documented eligibility requirements for consumer relief via the DOJ's Consumer Relief Fine. (Violations: Concealing Evidence from DOJ Investigators,)

Compliant summary: "importance of hmda-lar raw data disclosures stored in the national archives"

The existence of the clandestine Chase Non-Prime Lending Division, was so well hidden from federal regulators; that if it had not been for the HMDA-LAR Public Raw Data Disclosures, it would have been impossible to find hundreds of thousands subprime home mortgage loans originated at this clandestine center between 2004 and 2008; and the subsequent outsourcing/jettisoning of thousands of these "Toxic Mortgages" to Select Portfolio Servicing, Inc. in October 2013. The end result of this illegal "Eleventh-Hour Maneuver" was the disqualifying tens thousands of the mortgage-holders of these Chase-originated "Toxic Mortgages" of their rightful share of the four billion dollar consumer relief fine. An inordinately-high number of these "Toxic Mortgages" were originated to African Americans, residing in large urban MSAs/MDs, such as Atlanta, Detroit, and Washington, DC. JPMorgan affiliates created 491,898 home mortgage applications; from which, more than two hundred thousand subprime and Alt-A home mortgage loans were originated. In the same year that these home mortgage loans were originated, they were immediately sold to other JPMorgan affiliates. This questionably process, (referred to in this documents as the Two-Tier Mortgage Origination scheme) hid the fact that these home mortgage loans were originated as non-conforming mortgage loans, removing tale-tale HMDA-LAR non-conforming loan indicators such as rate spread and HOEPA indicators plus geocoding location, and borrower racial demographics and financial information.

ctive-WebShow: HMDA-LAR Public

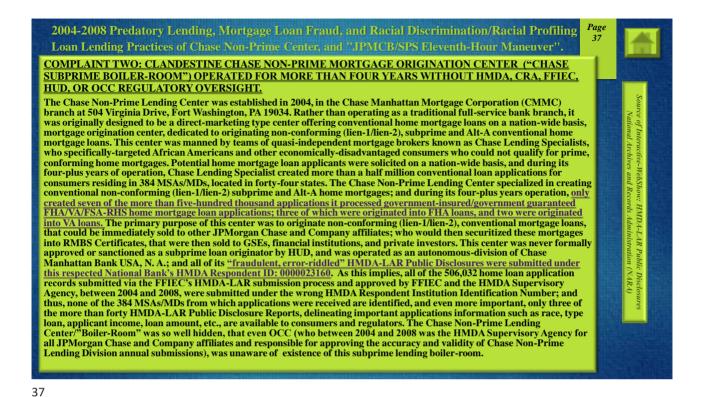


2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Page Loan Lending Practices of Chase Non-Prime Center, and "JPMCB/SPS Eleventh-Hour Maneuver". COMPLAINT ONE: PREDATORY LENDING MORTGAGE LOAN FRAUD, AND RACIAL DISCRIMINATION/RACIAL PROFILING ODYSSEY OF SUSIE BARNES: FROM "LIVING THE AMERICAN DREAM" TO "ENDURING THE AFRICAN AMERICAN NIGHTMARE." On March 3, 2004, Susie M. Barnes, a retired sixty-three-year-old, African American grandmother received an unsolicited fax message from a firm purporting to be "The Mortgage Expert – America Most Progressive Lender". This advertisement included claims such as:

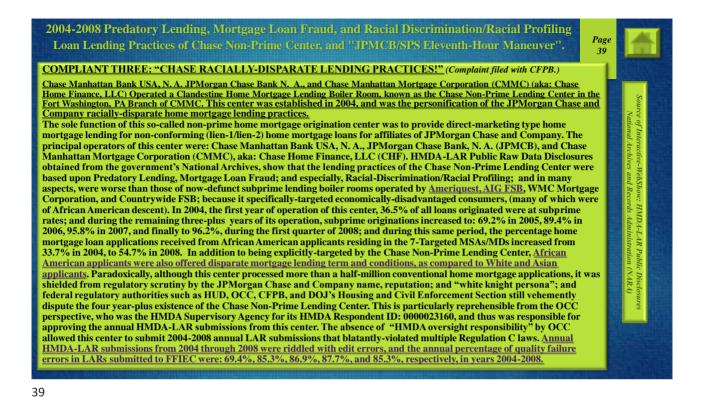
"Lowest Interest Rates Available - from 1.25%." No Mortgage Discount Points. **Instant Phone Approvals.** Interactive-WebShow: HMDA-LAR Public Self-Employed Applicants Accepted. This advertisement received by Susie Barnes appeared to be "God-sent", because she was considering refinancing the second mortgage of the residence she and her husband had owned for more than for more than twenty-four years. The unsolicited fax included a toll-free number for what Susie Barnes was led to believe was the mortgage lender in question, and when she called the toll-free number she was asked some questions regarding her current residence, the type mortgage loan she was seeking, and other personal/financial information. At the end of the conversation, Susie Barnes was informed that mortgage lender in question was CHASE, and was given a second toll-free telephone number to call. She was told that the person to whom she would be calling was Matthew Balin, a CHASE Lending Specialist (aka; CHASE Mortgage Broker), and he would be able to complete the mortgage loan application. (It was not until years later, that Susie Barnes discovered that the toll-free number contained in the fax advertisement was not to CHASE, but was the number of illicit, now-defunct direct marketing, lead-generation service, known as fax.com, that had been retained by Mr. Balin (and other Chase Lending Specialists) to generate leads to home mortgage applicants. (FTC records show that in 2004, this notorious, nationwide lead-generation spammer had already fined, and censured by both the FTC, and the State of California for multiple violations of TCPA, and other consumer-protection laws.) The depth of the business relationship between fax.com, and the Chase Lending Specialists manning this center, is still unknown; however, it is clear, that all "illicit mortgage loan leads" that were generated by fax.com, and then "sold to Chase lending specialists, were in direct violation of the federal TCPA statute. At a minimum, Chase Manhattan Bank USA, N. A. and JPMorgan Chase Bank, N. A., two of the operators of this center, should have been assessed federal fines of \$500 (or more) for each illegal lead purchased from fax.com; and the legality of the home mortgage loans originated based upon these illicit applicant leads should be thoroughly-investigated. Prior to 2004, Susie Barnes and her husband resided in a middle-to-upper-class neighborhood, and thus, did not fit the economically-disadvantaged profile that was preferred by Mr. Balin, and other Chase Lending Specialists; however, but the opportunity to reap a wind-fall, five-figure YSP bonus was an opportunity that he could not refuse. Once ensnared, Susie Barnes was no match for the sophisticated "bait and switch", "liar's loan/Stated Income", and other predatory lending tactics used by Mr. Balin; as he deliberately, and methodically committed HUD Mortgage Loan Fraud by created HUD Uniform Residential Loan Applications loan forms using connived, factitious borrower information, employment history, monthly income, incorrect assets and liabilities, etc. (Click to continue on next slide.)



Page 2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial **Discrimination/Racial Profiling Practices of Chase Non-Prime Lending** Center, and 2013 Eleventh-Hour Maneuver. of Interactive-WebShow: HMDA-LAR Public tional Archives and Records Administration ( Primary Interactive-WebShow Pages Detail Executive Complaint Complaint Complaint Complaint Complaint Complaint omplaint Summary Overview One Two Three Four Analysis Supplementary Interactive-WebShow Pages HMDA-LAR Chase Racial Racial Disparity "Chase/SPS Absence of Eleventh-Hour Public Raw Data Discrimination/Racial Indicators FHA, VA, and Disclosures. **Profiling Practices**. FSA-RHS Loans. Maneuver" Complaint Two



Page 2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver. of Interactive-WebShow: HMDA-LAR Public tional Archives and Records Administration ( Primary Interactive-WebShow Pages Detail Executive Complaint Complaint Complaint Complaint Complaint Complaint omplaint Summary Overview One Two Three Four Five Analysis Supplementary Interactive-WebShow Pages HMDA-LAR Chase Racial Racial Disparity "Chase/SPS Absence of Public Raw Data Indicators Discrimination/Racial FHA, VA, and Eleventh-Hour Disclosures. **Profiling Practices**. (RDIs) FSA-RHS Loans. Maneuver" Complaint Three



Page 2004-2008 Predatory Lending, Mortgage Loan Fraud, and Racial Discrimination/Racial Profiling Practices of Chase Non-Prime Lending Center, and 2013 Eleventh-Hour Maneuver. of Interactive-WebShow: HMDA-LAR Public tional Archives and Records Administration ( Primary Interactive-WebShow Pages Detail Executive Complaint Complaint Complaint Complaint Complaint Complaint omplaint Summary Overview One Two Three Four Five Analysis Supplementary Interactive-WebShow Pages HMDA-LAR Chase Racial Racial Disparity "Chase/SPS Absence of Eleventh-Hour Public Raw Data Indicators Discrimination/Racial FHA, VA, and Disclosures. **Profiling Practices**. FSA-RHS Loans. Maneuver" Complaint Four

