EXPERT REPORT
(In Response to Expert Report of Sharon Stedman)

In the Matter County of Cook Illinois v. Bank of America, et al,

Civil Case No. 14-CV-2280 (N.D. Ill.)

DR. GARY LACEFIELD

January 13, 2021

I am issuing this report in response to the Expert Report of Sharon Stedman ("Stedman Report"). The paragraph numbers set forth below correspond to those in the Stedman Report and I incorporate by reference my November 9, 2020 Expert Report ('Lacefield Report").

For the reasons and analysis set forth below, I disagree with Ms. Stedman's conclusions and confirm the analysis and conclusions in the Lacefield Report.

Para 18-37. Ms. Stedman bases the majority of her report upon a 2009 version of the Interagency Fair Lending Examination Procedures manual. Ms. Stedman reported that I did not follow the Federal Financial Institute Examination Council's (FFIEC) guidance or methodology to conduct a representative examination for the purpose of determining whether Defendants' actions rise to the level of determining 'disparate treatment' and/or 'disparate impact'. That is correct. The FFIEC members are banks and other depository institutions, where their guidance focused on following the money, not the impact their actions might have on consumers. The FFIEC rules, according to the document Ms. Stedman relied upon states in the preamble of the report (section v) that the rules were developed to 'focus on analyzing institution compliance with the broad, nondiscrimination requirements of the ECOA and the FHA.'[1] Additionally, Ms. Stedman's use of the August 2009 version of the Interagency Fair Lending Examination Procedures manual does not cover major changes in the interpretation of the Fair Housing Act that have taken place since 2009 including the Supreme Court's ruling regarding what actually constitutes 'disparate impact.'[2] Member banks were extremely upset over the ruling. The decision was a defeat for the lending industry. In a statement from the American Bankers Association, Frank Keating, ABA president and chief executive said, "our members are strong advocates for fair lending and enforcement of the Fair Housing Act. Disparate Impact theory, however, is not the right tool to achieve fairness and prevent discrimination in lending. This approach can have unintended consequences, such as causing financial institutions to shrink their operations rather than risk litigation, hurting the very groups it is intended to help."[3]

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[1] fairlend.pdf (ffiec.gov) v

[2] On June 25, the U.S. Supreme Court upheld of the disparate impact standard in housing discrimination in a 5-4 decision ruling on *Texas Department of Housing and Community Affairs v The Inclusive Communities Project.*

[3] The National Low Income Housing Coalition, Jun 29, 2015 U.S. Supreme Court Upholds Fair Housing Disparate Impact Principle | National Low Income Housing Coalition (nlihc.org)

Another key aspect considered by the Supreme Court is that "recognition of disparate impact claims is consistent with the Fair Housing Act's central purpose. The Fair Housing Act, like Title VII and the ADEA, was enacted to eradicate discriminatory practices within a sector of our Nation's economy…These unlawful practices include zoning laws and other housing restrictions that function unfairly to exclude minorities from certain neighborhoods without any sufficient justification. Suits targeting such practices reside at the heartland of disparate impact liability."[4]

A review of my Curricula Vitae reveals that the OCC and OTS requested help with training their investigators how to investigate acts of discrimination in lending, insurance red-lining and predatory lending issues. The United States Department of Housing and Urban Development (HUD) 'volunteered' me to conduct the six-week training course for OTS and OCC investigators, which I completed in October of 1998.[5] The training was necessary, as I was told by the investigator's supervisors, because they were only trained to 'follow the money,' not determine what is considered disparate treatment and certainly not what disparate impact theory was. It was clear to me that the OTS and OCC investigators were only aware of 'overt' discrimination—example: Bank employee John Doe states to an African American applicant, "We don't make loans to Blacks."

Ms. Stedman's opinion is misguidedly based entirely upon the Interagency Fair Lending Examination Procedures ("Interagency Procedures") established in August 2009 by the Federal Financial Institutions Examination Council ("FFIEC"). Her reliance on these Interagency Procedures is flawed and as a result, her conclusions should be considered unreliable and invalid. Critically, Ms. Stedman fails to address, or even mention, the fact that the 2009 FFEIC guidance came ***after all the bad loans were made*** in 2003-2008 and the banks generally stopped their discriminatory/predatory ***lending*** practices as a result of the financial crisis and subsequent governmental investigations. While this new guidance was designed as a result of the problem, it is not what the banks knew or should have known prior to 2009. So the methodology of examining individual loan characteristics is something the banks easily could and should have done prior to 2009, as HUD did in its own investigations. Second, we are neither HUD nor

[4] U.S. Supreme Court Upholds Fair Housing Disparate Impact Principle | National Low Income Housing Coalition (nlihc.org)

[5] Appendix 1 to November 9, 2020 Expert Report of Dr. Gary E. Lacefield (the "Lacefield Report") at p. 11.

FFEIC, are not doing a regulatory investigation, and need only show "some direct relationship" between the policy and the resulting harm to establish causation under civil FHA liability.

Moreover, the FFIEC designed their policies after the Fair Housing Act guidelines not the reverse. As the FFIEC "Interagency Procedures" advise, "[w]hile these procedures apply to many examinations, agencies routinely use statistical analyses or other specialized techniques in fair lending examinations to assist in evaluating whether a prohibited basis was a factor in an institution's credit decisions."[6]

My Lacefield Report, and the focus of my examination in this case, was to determine whether the actions of Defendants had a disparate impact to minority neighborhoods in Cook County. Upon completing my report and reviewing the statistical results, I believe it would lead a reasonable person to reach the same opinion as mine, that there existed an abundance of relative evidence, including sworn testimony by Defendants' ex-executives, directors, supervisors, and other managerial staff, that the actions of Defendants had a statistically significant disparate impact on predominately minority neighborhoods in Cook County.

If Defendants claim that there existed a 'business necessity' for their practices having a disparate impact, sworn testimony from Defendants' own ex-executives and supervisory staff tell a different story. For example: Managing Director Michael Winston[7] stated, "I can personally attest to Countrywide's predatory servicing practices. Every time I tried to pay off my mortgage loan, Countrywide would invent new costs or tack on additional fees at the last second. This experience fit with Countrywide's goal to maximize revenue and profit in every possible way, and to do so in disregard of its customers' interests."[8] Winston also stated that he was personally aware of Countrywide's discriminatory treatment of African American employees and when he raised concerns about Countrywide not following affirmative action to Drew Gissinger (President and Chief Operating Officer of Countrywide Home Loans, Inc.), Mr. Gissinger

[6] Interagency Procedures, August 2009, p. v.
[7] Michael Winston joined Countrywide Financial Corporation in 2005 as a Managing Director and Enterprise Chief Leadership Officer.
[8] Declaration of Michael Winston dated October 25, 2020 at ¶ 26.

responded that affirmative action was “not something for us to consider” and “it was not the law for Countrywide.[9]

Adam Gadsby, who served as a transaction manager in Countrywide’s Capital Markets Division and presently serves in a similar capacity for Bank of America, testified that he did not know what the term ‘disparate impact’ meant.[10] The term disparate impact has been part of fair lending training since 1995, so he should be familiar with the term. Asked about third parties, Gadsby stated in part “…. Correspondent Lending Division normally did not engage an outside third party for their due diligence reviews.”[11] Gadsby stated that it would be difficult to identify ‘…any steering in the loan files that were presented...’ was not correct.[12] Any due diligence of the loan files could include looking at the FICO score, CLTV, and DTI, three data points to question why a borrower was placed in a subprime loan when they clearly qualified for a prime product. Gadsby also confided that he was not sure that there was a review using HMDA data to uncover steering.[13] It has been industry practice and HUD requirement to conduct an annual HMDA analysis to uncover this type of discrimination.

Para 35-37. Ms. Stedman also erroneously states that my methodology was ‘unreliable and unsound,” for the purposes of identifying disparate impact because I did not specify what policies my delimiters are designed to test, and thus I “cannot establish that a specific policy caused the disparities that he alleges exist.”[14] On the contrary, my Expert Report explains the delimiters for which I tested with respect to Defendants’ origination, servicing and foreclosure practices.[15] The design and purpose of these delimiters are also clearly reflected in my report: The delimiters I developed were from the lending audit criteria used by HUD to review the underwriting standards of each lender.[16] The delimiters were designed to identify HUD’s highest risk scale consisting of four risk levels of loan audits. While deficiencies that would cause harm to the consumer or impact the FHA insurance fund (inability to perform and foreclosure) are

[9] Id. at ¶ 31.
[10] Appendix 7 to the Lacefield Report, Evidentiary Record para 16
[11] Gadsby Tr. at 48:3-12.
[12] Lacefield Report at ¶ 61
[13] Id.
[14] Stedman Report at ¶ 35.
[15] Lacefield Report at ¶¶ 76-156.
[16] Id. at ¶ 82.

categorized as a two (Moderate Risk) or three (Material Risk) with a three being the highest risk.[17]

The specific delimiters I discuss below have been refined over the years from my standpoint as a compliance and quality control officer with 32 years of experience. I have identified delimiters that could be used to identify potential Category 2 and 3 related issues resulting in predatory and discriminatory loans. It could take several Category 2's or in some cases only one Category 3 rating typically may make the loan uninsurable and therefore unsalable. On all of my significance tests, I applied the same delimiters across the Defendants' loan data to all races and ethnicities.[18]

Para 43. Ms. Stedman starts her analysis of my report with Delimiter 13 regarding rate spread flag. I believe the first 12 delimiters are just as important if not more to determine disparate impact. Also, it is important to understand the process I used to determine significant differences.

Using loan level data provided by Defendants, I determined the presence of these delimiters for any loan regardless of race or ethnicity. I then evaluated whether the prevalence of these delimiters was different for White and minority loans using statistical tests.[19] In other words, I tested whether at a .05 significance level, the proportion of White loans with the delimiter was different than the proportion of minority loans with the delimiter. I considered loans to be discriminatory on the basis of origination delimiters if the loan for a minority group was flagged with the delimiter more often than the White group and if the test's p-value for the disparity was significant (less than .05) for tests performed within census tracts groups.[20]

The statistical comparisons on proportions conducted and test results revealed that the Defendants' actions relative to the delimiter(s) indicated a disparate treatment/impact on African American (Black), Hispanic, and for all Other (O) minority families when compared to similarly situated White families. We also identified disparity in census tract minority population >50% where race/ethnicity were not proved by the Defendants. Loans were broken into five categories

[17] Id. at ¶ 83.
[18] Id. at ¶ 87.
[19] Id. at ¶ 114.
[20] Id.

based upon census tract data: <30% minority, 31-50% minority, 51-70% minority, 71-90% minority, and 91-100% minority. Race and ethnicity were divided into Black, Hispanic, and Other. 'Other' minorities represent all other minorities except Black and Hispanic.[21]

To compare the prevalence of the chosen delimiters (and other tests conducted as described below), I divided the loans into Black, Hispanic, and Other. To make this determination, all variables providing race and ethnicity reported in Defendants' data were considered. Further, loans were broken into five categories based upon census tract data: <30% minority, 31-50% minority, 51-70% minority, 71-90% minority, and 91-100% minority. I generally performed the comparisons between White and minorities within these groups for minority concentrations and across minority concentrations (without regards to minority concentrations).[22]

There were several instances in which Defendants' data did not identify race or ethnicity information for loans. In those, instances, based on the census tracts groupings described above, I made a determination of whether the loan with missing race/ethnicity information part of a grouping with was >50% minority. I then treated the missing race/ethnicity loans in >50% minority census tracts as another category along with Black, Hispanic, and Other as minorities for purposes of evaluating disparity in the presence of these delimiters.[23]

I generally performed the comparisons and tests after dividing the population of loans into three different entities: Bank of America, Countrywide, and Missing IDs. The Missing IDs entity was generated to capture loans for which Defendants did not provide sufficient information to determine which entity originated or acquired the loans originally. For delimiter 19, I evaluated the delimiter across entities only since that delimiter does not look into an individual characteristic of a loan but rather at groups of loans that shared similar characteristics. [24]

The statistical tests performed revealed that for many of the delimiters I considered, the Defendant's actions relative to the Delimiter(s) indicated a statistically significant disparate treatment/impact on minority families when compared to White families. [25]

[21] Id. at ¶ 115.
[22] Id. at ¶ 116.
[23] Id. at ¶ 117
[24] Id. at ¶ 118
[25] Id. at ¶ 119

For example, for delimiter 1 and BoA loans as shown in the table, the disparity for Hispanic borrowers (as denoted by the column "Difference in Proportions") in census tracts with <30% minority is 8.8%. This number is obtained by taking the difference between the proportion of Hispanic loans with the delimiter (61%) and proportion of White loans with the delimiter (52.2%). This difference, based on the statistical tests, is significant as denoted by a p-value of less than .05 (*See* column "Fisher Exact Test P-value").[26]

From the table on pages 31-32 of the Lacefield Report, one can further see that the disparity increases as one moves into census tracts with higher proportions of minorities in them. The disparity is 10.50% for census tracts with 31-50% minority, 15.87% for census tracts with 51-70% minority, 19.3% in census tracts with 71-90% minority, and 25.68% for census tracts with 91-100% minority. In all of these groups the disparity is significant (based on the p-value of less than .05). Significant disparities between minorities and Whites for a variety of delimiters and the Defendant entities are set out in Appendix 3A in similar tables to the one here.

Entity	**Minority Population of Census Tracts**	**Minority**	**del1**			**Difference in Proportions**	**Fisher's Exact Test p**
			0	**1**	**Total**		
Bank of America	< 30%	Hispanic	598	937	1,535	8.81%	0.000000
		%	38.96%	61.04%			
Bank of America	31-50%	Hispanic	614	1,055	1,669	10.50%	0.000000
		%	36.79%	63.21%			
Bank of America	51-70%	Hispanic	519	1,123	1,642	15.87%	0.000000
		%	31.61%	68.39%			
Bank of America	51-70%	Other	524	687	1,211	4.21%	0.008715
		%	43.27%	56.73%			
Bank of America	71-90%	Hispanic	590	1,406	1,996	19.53%	0.000000
		%	29.56%	70.44%			

[26] Id. at ¶ 120

Bank of America	91-100%	Black	1,972	2,687	4,659	11.19%	0.000000
		%	42.33%	57.67%			
Bank of America	91-100%	Hispanic	417	1,081	1,498	25.68%	0.000000
		%	27.84%	72.16%			
Bank of America	Any Census Tract	Black	3,758	4,636	8,394	3.02%	0.000000
		%	44.77%	55.23%			
Bank of America	Any Census Tract	Hispanic	2,746	5,607	8,353	14.91%	0.000000
		%	32.87%	67.13%			
Countrywide	< 30%	Hispanic	1,104	1,945	3,049	9.16%	0.000000
		%	36.21%	63.79%			
Countrywide	< 30%	Other	1,270	1,677	2,947	2.27%	0.017195
		%	43.09%	56.91%			
Countrywide	31-50%	Hispanic	1,157	2,509	3,666	12.36%	0.000000
		%	31.56%	68.44%			
Countrywide	51-70%	Hispanic	1,374	3,148	4,522	15.34%	0.000000
		%	30.38%	69.62%			
Countrywide	51-70%	Other	864	1,289	2,153	5.59%	0.000002
		%	40.13%	59.87%			
Countrywide	71-90%	Hispanic	1,528	4,279	5,807	21.82%	0.000000
		%	26.31%	73.69%			
Countrywide	71-90%	Other	269	354	623	4.95%	0.022117
		%	43.18%	56.82%			
Countrywide	91-100%	Black	6,893	6,330	13,223	7.31%	0.000000
		%	52.13%	47.87%			
Countrywide	91-100%	Hispanic	1,643	3,835	5,478	29.44%	0.000000
		%	29.99%	70.01%			
Countrywide	91-100%	>50% Chance Being Minority	1,357	1,055	2,412	3.17%	0.024375

		%	56.26%	43.74%			
Countrywide	Any Census Tract	Hispanic	6,808	15,722	22,530	15.43%	0.000000
		%	30.22%	69.78%			
Countrywide	Any Census Tract	Other	4,103	5,417	9,520	2.55%	0.000002
		%	43.10%	56.90%			
Missing Institution Id	< 30%	Other	202	109	311	11.99%	0.000005
		%	64.95%	35.05%			
Missing Institution Id	31-50%	Other	221	125	346	12.62%	0.000003
		%	63.87%	36.13%			
Missing Institution Id	51-70%	Other	99	105	204	21.68%	0.000000
		%	48.53%	51.47%			
Missing Institution Id	71-90%	Other	71	70	141	28.14%	0.000000
		%	50.35%	49.65%			
Missing Institution Id	91-100%	Other	42	50	92	32.37%	0.000009
		%	45.65%	54.35%			
Missing Institution Id	Any Census Tract	Other	650	467	1,117	17.82%	0.000000
		%	58.19%	41.81%			

I note that some of the delimiters I initially intended to test could not be tested due to the lack of the necessary data to identify such delimiters (delimiter 9 and delimiter 18). For delimiter 8 (high-risk products), I also test each of the products or documentation types separately.

Further, I do not test delimiter 5 since Whites and minorities with loans in the same neighborhoods will be flagged if 5 or more foreclosures are found in their neighborhoods and the difference that one can observed from that tests will not necessarily demonstrate disparate impact by race. Instead, I perform a separate analysis on foreclosures which I describe in the next section.[27]

[27] Id. at ¶ 124.

I have conducted additional analysis of Defendants' loan data using these delimiters on Defendants various loan product types as set forth in the Tables at Appendix 3B to the Lacefield Report. This analysis reveals significant disparities between White and Black or Hispanic borrowers reflecting that Defendants discriminated against Black and Hispanic borrowers in their loan origination activity based on loan product type.[28]

For example, when analyzing Countrywide Defendant's ARM loan types, the above-referenced analysis of the delimiters reveals that Hispanic families in census tract <30% minority received 3.41% more ARM loans than Whites. As shown in the table identified on page 33 of the Lacefield Report, the rate of this disparity increases as the minority concentration in census tracts increase. For 31-50% minority census tracts, Hispanics received 4.61% more ARM loans than Whites, 7.88% more in census tracts of 51-70% minority, 8.50% in census tracts 71-90% minority, and 8.18% in census tracts of 91-100% minority. [29]

Entity	**Minority Population of Census Tracts**	**Minority**	**arm**			**Difference in Proportions**	**Fisher's Exact Test p**
			0	**1**	**Total**		
Bank of America	< 30%	Other	2,338	879	3,217	9.16%	0.000000
		%	72.68 %	27.32 %			
Bank of America	31-50%	Other	2,471	798	3,269	7.61%	0.000000
		%	75.59 %	24.41 %			
	51-70%	Other	1,236	367	1,603	7.73%	0.000000

[28] Id. at ¶ 125.
[29] Id. at ¶ 126.

Bank of America		%	77.11 %	22.89 %			
Bank of America	71-90%	Other	418	77	495	4.33%	0.009293
		%	84.44 %	15.56 %			
Bank of America	Any Census Tract	Other	6,649	2,154	8,803	7.50%	0.000000
		%	75.53 %	24.47 %			
Countrywide	< 30%	Hispanic	2,373	1,062	3,435	3.41%	0.000021
		%	69.08 %	30.92 %			
Countrywide	< 30%	Other	2,308	1,149	3,457	5.73%	0.000000
		%	66.76 %	33.24 %			
Countrywide	31-50%	Hispanic	2,749	1,349	4,098	4.61%	0.000000
		%	67.08 %	32.92 %			
Countrywide	31-50%	Other	2,743	1,242	3,985	2.86%	0.000266
		%	68.83 %	31.17 %			
Countrywide	51-70%	Hispanic	3,248	1,845	5,093	7.88%	0.000000
		%	63.77 %	36.23 %			
Countrywide	51-70%	>50% Chance Being Minority	1,678	754	2,432	2.66%	0.008678
		%	69.00 %	31.00 %			
Countrywide	71-90%	Hispanic	4,266	2,313	6,579	8.50%	0.000000
		%	64.84 %	35.16 %			

Countrywide	71-90%	>50% Chance Being Minority	1,397	654	2,051	5.23%	0.000016
		%	68.11%	31.89%			
Countrywide	91-100%	Hispanic	3,946	2,284	6,230	8.18%	0.000000
		%	63.34%	36.66%			
Countrywide	91-100%	Other	315	194	509	9.63%	0.000019
		%	61.89%	38.11%			
Countrywide	91-100%	>50% Chance Being Minority	2,631	1,249	3,880	3.71%	0.001312
		%	67.81%	32.19%			
Countrywide	Any Census Tract	Hispanic	16,600	8,853	25,453	6.98%	0.000000
		%	65.22%	34.78%			
Countrywide	Any Census Tract	Other	7,707	3,570	11,277	3.86%	0.000000
		%	68.34%	31.66%			
Countrywide	Any Census Tract	>50% Chance Being Minority	5,706	2,657	8,363	3.97%	0.000000
		%	68.23%	31.77%			
Missing Institution Id	< 30%	Black	67	27	94	13.88%	0.000654
		%	71.28%	28.72%			
	< 30%	Other	312	99	411	9.25%	0.000003

Missing Institution Id		%	75.91%	24.09%			
Missing Institution Id	31-50%	Other	357	107	464	7.71%	0.000127
		%	76.94%	23.06%			
Missing Institution Id	51-70%	>50% Chance Being Minority	3,062	2,128	5,190	24.32%	0.000000
		%	59.00%	41.00%			
Missing Institution Id	71-90%	>50% Chance Being Minority	3,787	2,461	6,248	23.47%	0.000000
		%	60.61%	39.39%			
Missing Institution Id	91-100%	>50% Chance Being Minority	7,978	4,992	12,970	20.47%	0.000000
		%	61.51%	38.49%			
Missing Institution Id	Any Census Tract	Other	1,444	323	1,767	2.76%	0.004998
		%	81.72%	18.28%			
Missing Institution Id	Any Census Tract	>50% Chance Being Minority	14,827	9,581	24,408	23.74%	0.000000
		%	60.75%	39.25%			

Conversely, my analysis shows that borrowers whose race is unknown, but who live in high minority concentration census tracts, received disproportionately fewer conventional mortgage loans than Whites. For example, a comparison of the number of conventional loans BoA made in low minority census tracts versus high minority census tracts reveals that BoA made 19.97% less conventional loans in 51-70% minority census tracts compared to lower minority census tracts and this disparity increases as the minority concentration in census tracts increases: 35.22% less conventional loans in census tracts of 71-90% minority, and 38.52% less conventional loans in census tract 91-100% minority. [30]

The disparity observed for conventional loans is repeated when examining FHA insured loans. For example, in census tracts with less than <30% minority concentration, BoA made 20.55% less FHA insured loans to Blacks than to Whites. This disparity also exists in the higher minority concentration census tracts: 25.44% in census tracts of 51-70% minority and 26.43% in census tracts with 71-90% minorities. Other comparisons showing significant disparities relating to the use of high-risk loan products are provided in Appendix 3B.[31]

Entity	**Minority Population of Census Tracts**	**Minority**	**fha**			**Difference in Proportions**	**Fisher's Exact Test p**
			0	**1**	**Total**		
Bank of America	**< 30%**	**Black**	**383**	**177**	**560**	**20.55%**	**0.000000**
		%	**68.39%**	**31.61%**			
Bank of America	**< 30%**	**Hispanic**	**1,638**	**575**	**2,213**	**14.93%**	**0.000000**
		%	**74.02%**	**25.98%**			
Bank of America	**31-50%**	**Black**	**622**	**270**	**892**	**16.36%**	**0.000000**
		%	**69.73%**	**30.27%**			
Bank of America	**31-50%**	**Hispanic**	**1,563**	**788**	**2,351**	**19.60%**	**0.000000**
		%	**66.48%**	**33.52%**			
Bank of America	**51-70%**	**Black**	**839**	**627**	**1,466**	**25.44%**	**0.000000**
		%	**57.23%**	**42.77%**			
Bank of America	**51-70%**	**Hispanic**	**1,481**	**816**	**2,297**	**18.19%**	**0.000000**
		%	**64.48%**	**35.52%**			
Bank of America	**71-90%**	**Black**	**1,114**	**1,229**	**2,343**	**26.43%**	**0.000000**
		%	**47.55%**	**52.45%**			
	71-90%	**Hispanic**	**1,776**	**1,111**	**2,887**	**12.46%**	**0.000000**

[30] Id. at ¶ 127
[31] Id. at ¶ 128

Bank of America		**%**	**61.52%**	**38.48%**			
Bank of America	**91-100%**	**Black**	**3,505**	**3,317**	**6,822**	**19.81%**	**0.000000**
		%	**51.38%**	**48.62%**			
Bank of America	**91-100%**	**Hispanic**	**1,357**	**835**	**2,192**	**9.28%**	**0.000000**
		%	**61.91%**	**38.09%**			
Bank of America	**Any Census Tract**	**Black**	**6,478**	**5,623**	**12,101**	**32.95%**	**0.000000**
		%	**53.53%**	**46.47%**			
Bank of America	**Any Census Tract**	**Hispanic**	**7,832**	**4,126**	**11,958**	**20.99%**	**0.000000**
		%	**65.50%**	**34.50%**			
Countrywide	**< 30%**	**Black**	**745**	**121**	**866**	**10.22%**	**0.000000**
		%	**86.03%**	**13.97%**			
Countrywide	**< 30%**	**Hispanic**	**3,287**	**222**	**3,509**	**2.58%**	**0.000000**
		%	**93.67%**	**6.33%**			
Countrywide	**31-50%**	**Black**	**1,273**	**178**	**1,451**	**8.14%**	**0.000000**
		%	**87.73%**	**12.27%**			
Countrywide	**31-50%**	**Hispanic**	**3,895**	**339**	**4,234**	**3.88%**	**0.000000**
		%	**91.99%**	**8.01%**			
Countrywide	**51-70%**	**Black**	**2,080**	**496**	**2,576**	**13.93%**	**0.000000**
		%	**80.75%**	**19.25%**			
Countrywide	**51-70%**	**Hispanic**	**4,846**	**426**	**5,272**	**2.76%**	**0.000000**
		%	**91.92%**	**8.08%**			
Countrywide	**51-70%**	**>50% Chance Being Minority**	**2,300**	**177**	**2,477**	**1.82%**	**0.000477**
		%	**92.85%**	**7.15%**			
Countrywide	**71-90%**	**Black**	**3,561**	**1,044**	**4,605**	**14.36%**	**0.000000**
		%	**77.33%**	**22.67%**			

Countrywide	**71-90%**	**>50% Chance Being Minority**	**1,876**	**239**	**2,115**	**2.99%**	**0.000113**
		%	**88.70%**	**11.30%**			
Countrywide	**91-100%**	**Black**	**12,478**	**3,352**	**15,830**	**12.20%**	**0.000000**
		%	**78.83%**	**21.17%**			
Countrywide	**91-100%**	**>50% Chance Being Minority**	**3,459**	**554**	**4,013**	**4.83%**	**0.000000**
		%	**86.19%**	**13.81%**			
Countrywide	**Any Census Tract**	**Black**	**20,144**	**5,197**	**25,341**	**16.01%**	**0.000000**
		%	**79.49%**	**20.51%**			
Countrywide	**Any Census Tract**	**Hispanic**	**24,267**	**2,100**	**26,367**	**3.47%**	**0.000000**
		%	**92.04%**	**7.96%**			
Countrywide	**Any Census Tract**	**>50% Chance Being Minority**	**7,635**	**970**	**8,605**	**6.78%**	**0.000000**
		%	**88.73%**	**11.27%**			
Missing Institution Id	**< 30%**	**Other**	**698**	**8**	**706**	**0.70%**	**0.019449**
		%	**98.87%**	**1.13%**			
Missing Institution Id	**31-50%**	**Black**	**212**	**7**	**219**	**2.46%**	**0.002470**
		%	**96.80%**	**3.20%**			
Missing Institution Id	**51-70%**	**Black**	**268**	**20**	**288**	**5.07%**	**0.000013**
		%	**93.06%**	**6.94%**			
Missing Institution Id	**51-70%**	**>50% Chance Being Minority**	**8,275**	**390**	**8,665**	**2.63%**	**0.000000**
		%	**95.50%**	**4.50%**			
	71-90%	**Black**	**520**	**65**	**585**	**8.12%**	**0.000000**

Missing Institution Id		**%**	**88.89%**	**11.11%**			
Missing Institution Id	**71-90%**	**Other**	**334**	**22**	**356**	**3.19%**	**0.019652**
		%	**93.82%**	**6.18%**			
Missing Institution Id	**71-90%**	**>50% Chance Being Minority**	**8,841**	**638**	**9,479**	**3.74%**	**0.000044**
		%	**93.27%**	**6.73%**			
Missing Institution Id	**Any Census Tract**	**Black**	**2,536**	**372**	**2,908**	**11.73%**	**0.000000**
		%	**87.21%**	**12.79%**			
Missing Institution Id	**Any Census Tract**	**Other**	**2,660**	**82**	**2,742**	**1.93%**	**0.000000**
		%	**97.01%**	**2.99%**			
Missing Institution Id	**Any Census Tract**	**>50% Chance Being Minority**	**33,779**	**2,259**	**36,038**	**5.21%**	**0.000000**
		%	**93.73%**	**6.27%**			

Foreclosure Analysis

I conducted additional analysis of Defendants' loan data using these same origination delimiters on the rates of foreclosure experienced by Black and Hispanic borrowers as compared to White borrowers. The purpose of this analysis was to evaluate the propensity of Defendants to foreclose on loans to minorities and in minority neighborhoods. In evaluating this, I use the same race criteria and census tract groupings I described in the previous section.[32]

[32] Id. at ¶ 129

To perform this analysis, I used a list of foreclosures that was obtained by combining foreclosure indicators provided in Defendants' data, plus additional foreclosures identified by matching name and addresses to the County's docket database. \[33]

I considered loans to be predatory on the basis of foreclosure if loans for a minority group were categorized as foreclosed more often than the White group and if the test's p-value for the disparity was significant (less than .05) for tests performed within census tracts groups.[34]

This analysis, set forth in Appendix 3C, shows that Defendants foreclosed on Black and Hispanic borrowers to greater extent that White borrowers, revealing a disparate impact on those minorities as a result of Defendants' discriminatory loan origination activity. [35]

For example, BoA's foreclosures by minority census tract level for Black borrowers are shown below. The data revealed that in census tracts of <30% minority (predominately White neighborhoods) Blacks experienced a foreclosure rate 13.88% higher than that of Whites. In census tracts 51-70% minority Blacks experienced a foreclosure rate 15.55% higher than Whites. Further, in census tracts of 71-90% minority, this disparity in foreclosure rates between White and Black borrowers is 15.98%. The full table showing disparities in foreclosure rates for minority borrowers relative to white borrowers are provided in Appendix 3C.[36]

Entity	**Minority Population of Census Tracts**	**Minority**	**foreclosure 0**	**1**	**Total**	**Difference in Proportions**	**Fisher's Exact Test p**
Bank of America	< 30%	Black	446	114	560	13.88%	0.000000
		%	79.64%	20.36%			
Bank of America	< 30%	Hispanic	1,877	336	2,213	8.71%	0.000000
		%	84.82%	15.18%			
Bank of America	31-50%	Black	722	170	892	9.88%	0.000000
		%	80.94%	19.06%			
	31-50%	Hispanic	1,889	462	2,351	10.48%	0.000000

[33] Id. at ¶ 130
[34] Id. at ¶ 131
[35] Id. at ¶ 132
[36] Id. at ¶ 133

Bank of America		%	80.35%	19.65%			
Bank of America	51-70%	Black	1,058	408	1,466	15.28%	0.000000
		%	72.17%	27.83%			
Bank of America	51-70%	Hispanic	1,785	512	2,297	9.74%	0.000000
		%	77.71%	22.29%			
Bank of America	51-70%	>50% Chance Being Minority	1,084	712	1,796	27.09%	0.000000
		%	60.36%	39.64%			
Bank of America	71-90%	Black	1,538	805	2,343	15.98%	0.000000
		%	65.64%	34.36%			
Bank of America	71-90%	Hispanic	2,164	723	2,887	6.67%	0.000000
		%	74.96%	25.04%			
Bank of America	71-90%	>50% Chance Being Minority	815	1,098	1,913	39.02%	0.000000
		%	42.60%	57.40%			
Bank of America	91-100%	>50% Chance Being Minority	1,414	2,283	3,697	24.95%	0.000000
		%	38.25%	61.75%			
Bank of America	Any Census Tract	Black	8,013	4,088	12,101	24.76%	0.000000
		%	66.22%	33.78%			
Bank of America	Any Census Tract	Hispanic	9,268	2,690	11,958	13.47%	0.000000
		%	77.50%	22.50%			
Bank of America	Any Census Tract	>50% Chance Being Minority	3,313	4,093	7,406	46.24%	0.000000
		%	44.73%	55.27%			
Countrywide	< 30%	Black	658	208	866	11.13%	0.000000
		%	75.98%	24.02%			

Countrywide	< 30%	Hispanic	2,644	865	3,509	11.77%	0.000000
		%	75.35%	24.65%			
Countrywide	31-50%	Black	1,057	394	1,451	10.62%	0.000000
		%	72.85%	27.15%			
Countrywide	31-50%	Hispanic	2,951	1,283	4,234	13.76%	0.000000
		%	69.70%	30.30%			
Countrywide	51-70%	Black	1,838	738	2,576	8.00%	0.000000
		%	71.35%	28.65%			
Countrywide	51-70%	Hispanic	3,409	1,863	5,272	14.69%	0.000000
		%	64.66%	35.34%			
Countrywide	71-90%	Black	3,177	1,428	4,605	4.55%	0.000002
		%	68.99%	31.01%			
Countrywide	71-90%	Hispanic	4,338	2,496	6,834	10.06%	0.000000
		%	63.48%	36.52%			
Countrywide	71-90%	>50% Chance Being Minority	1,442	673	2,115	5.36%	0.000008
		%	68.18%	31.82%			
Countrywide	Any Census Tract	Black	17,347	7,994	25,341	15.10%	0.000000
		%	68.45%	31.55%			
Countrywide	Any Census Tract	Hispanic	17,356	9,011	26,367	17.73%	0.000000
		%	65.82%	34.18%			
Countrywide	Any Census Tract	>50% Chance Being Minority	6,017	2,588	8,605	13.63%	0.000000
		%	69.92%	30.08%			
Missing Institution Id	< 30%	Hispanic	289	108	397	10.40%	0.000000
		%	72.80%	27.20%			
Missing Institution Id	31-50%	Hispanic	284	159	443	13.92%	0.000000
		%	64.11%	35.89%			

Missing Institution Id	51-70%	Hispanic	253	204	457	21.19%	0.000000
		%	55.36%	44.64%			
Missing Institution Id	51-70%	>50% Chance Being Minority	5,699	2,966	8,665	10.78%	0.000000
		%	65.77%	34.23%			
Missing Institution Id	71-90%	Hispanic	353	217	570	13.82%	0.000000
		%	61.93%	38.07%			
Missing Institution Id	71-90%	>50% Chance Being Minority	5,725	3,754	9,479	15.35%	0.000000
		%	60.40%	39.60%			
Missing Institution Id	91-100%	Hispanic	272	253	525	11.19%	0.002671
		%	51.81%	48.19%			
Missing Institution Id	Any Census Tract	Black	2,143	765	2,908	6.85%	0.000000
		%	73.69%	26.31%			
Missing Institution Id	Any Census Tract	Hispanic	1,477	948	2,425	19.64%	0.000000
		%	60.91%	39.09%			
Missing Institution Id	Any Census Tract	>50% Chance Being Minority	22,022	14,016	36,038	19.44%	0.000000
		%	61.11%	38.89%			
Aggregated	< 30%	Black	1,240	349	1,589	11.12%	0.000000
		%	78.04%	21.96%			
Aggregated	< 30%	Hispanic	4,810	1,309	6,119	10.55%	0.000000
		%	78.61%	21.39%			
Aggregated	31-50%	Black	1,962	600	2,562	9.01%	0.000000
		%	76.58%	23.42%			
Aggregated	31-50%	Hispanic	5,124	1,904	7,028	12.69%	0.000000
		%	72.91%	27.09%			
Aggregated	51-70%	Black	3,112	1,218	4,330	9.91%	0.000000

		%	71.87%	28.13%			
Aggregated	51-70%	Hispanic	5,447	2,579	8,026	13.92%	0.000000
		%	67.87%	32.13%			
Aggregated	51-70%	>50% Chance Being Minority	8,723	4,215	12,938	14.36%	0.000000
		%	67.42%	32.58%			
Aggregated	71-90%	Black	5,155	2,378	7,533	7.80%	0.000000
		%	68.43%	31.57%			
Aggregated	71-90%	Hispanic	6,855	3,436	10,291	9.62%	0.000000
		%	66.61%	33.39%			
Aggregated	71-90%	>50% Chance Being Minority	7,982	5,525	13,507	17.14%	0.000000
		%	59.10%	40.90%			
Aggregated	91-100%	>50% Chance Being Minority	14,647	10,957	25,604	6.23%	0.000000
		%	57.21%	42.79%			
Aggregated	Any Census Tract	Black	27,503	12,847	40,350	17.77%	0.000000
		%	68.16%	31.84%			
Aggregated	Any Census Tract	Hispanic	28,101	12,649	40,750	16.97%	0.000000
		%	68.96%	31.04%			
Aggregated	Any Census Tract	>50% Chance Being Minority	31,352	20,697	52,049	25.70%	0.000000
		%	60.24%	39.76%			

The common denominator for all of the loans reviewed was first, all of the loans were either originated or purchased and serviced by the Defendants. Next, the treatment (delimiter) was applied across all races evenly. Third, we focused only on White, African American, and Hispanic identified data. There were thousands of loans that did not identify the race or national origin—so to be more accurate for the analysis, we identified the property missing the information based upon the subject loan address by minority census tract levels. Forth, all of the loans were for 1-4 single family mortgage loans.

D-1 Income insufficient to support loan amount. The industry general rule of thumb that we as compliance and quality control experts use to identify loans 'set for failure' when the mortgage loan amount should be less than 2.5 times gross income. We flagged loans with terms of >= 360 (months) and loan amounts that are 2.5 times gross income. Loans typically exceeding these criteria are considered higher risk than loans where the loan amount is less than 2.5 times the borrower's gross annual income.[37] Income is the first element of the ability to repay review. Regardless of credit score, assets, appraised value and so on, we measured all loans based upon the posted income compared to the loan amount.

D-2 Amortization Terms that exceed 360 months. [> 360] If the term of the loan exceeds 360 months, the monthly mortgage payment is only slightly lower, but the length of time required to repay these 'slightly' lower payments increases significantly as the term increases. This may prevent the borrower from qualifying for a new loan at a lower interest rate. Additionally, the consumer has to make many more payments before they realize any equity, not to mention the significantly higher amount of interest paid over the longer term. (Examples from the Bank of America data provided i.e. 533, 564, 537, 480, 485 etc.). [38]

All of the Delimiters are described to the same level as the first two delimiters. All of the delimiters are described in my report in paragraphs 92-113. I will address the specific delimiters mentioned by Ms. Stedman. Ms. Steadman starts her analysis of my report with Delimiter #13 regarding rate spread flag.

D-13 All Loans where APR was triggered (3 pts higher than the prime rate for originations and 5 pts or higher than prime for refinanced loans) requiring the posting of the rate spread. Flag any loan with a Rate Spread greater than 0. Lenders are not required to post the APR -Annual Percentage Rate (interest) unless the rate 'triggers' the mandatory regulatory rule (Truth in Lending Act) by charging three percentage points or more than the prime rate.

[37] Id. at ¶ 92
[38] Id. at ¶ 93

We did not use any sampling method; we used every loan for every delimiter based upon the data provided by Defendants. Our analysis revealed that minority applicants statistically triggered the disclosure much more frequently than White applicants, depending upon which neighborhood the borrower lived in. This would indicate that non-white (minority) borrowers were charged higher interest rates on loans across the board (based upon the prime rate) than similarly situated white applicants.[39] The higher the percentage of minorities in a census tract, the more frequent minority borrowers were placed in high priced loans more frequently than in predominately white neighborhoods. This data clearly demonstrates that minority neighborhoods were targeted more frequently for higher cost loans than families living in predominately white neighborhoods. By measuring all loans across all the relevant years, including all products together, the ratio of all loans that were APR triggered by higher priced loans should be even across all census tracts regardless of the minority population in the census tracts.

Para 44-45. Ms. Stedman alleged that my Delimiter 16 aggregates two distinct populations: (a) unemployed borrowers, and (b) retired borrowers with a DTI ratio greater than 48%. Ms. Stedman stated that I then analyze the prevalence of this delimiter between the minority and nonminority borrowers. This approach was flawed because she claims that I have not established that the borrowers in Delimiter 16 are similarly situated. By design, this delimiter aggregates two distinct populations, retired and unemployed borrowers, over a multi-year time period, without accounting for Bank of America's and Countrywide's different underwriting and product guidelines, or all of the borrowers' credit characteristics. As a result, I had not determined that the borrowers in Delimiter #16 are actually similarly situated. A novice could be able to see that the one common factor between these two groups is that both groups are on fixed incomes. So if the Debt-To Income - ratio is greater than 48% how are the typical borrowers going to be able to repay any adjustable rate mortgage after the teaser rate expires and after any other rate adjustment.

[39] Id. at ¶ 104

Para 46-48. Ms. Steadman does not understand why each delimiter is special unto itself. And looks at the resulting practice with the impact on neighborhoods. My approach should have no bearing on loans, income levels, home prices, an individual mortgage product (unless the specific loan product is the delimiter such as Pick-a-Pay loan products) or the underwriting guidelines and policy and procedure they represent. Therefore, the data shows what the results are for any particular delimiter, with all things being equal, in each census tract minority level. For example, why is there a statistically significant difference between the foreclosure rate of families living in white neighborhoods versus the much higher foreclosure rate in predominately minority neighborhoods. This plainly shows borrowers in minority neighborhoods being placed in loans at a statistically significant higher rate that the borrower did not have the ability to repay compared to borrowers living in white neighborhoods.

Para 49-55. I do not disagree that Defendants have compliance and quality control programs in place. However, there is no evidence that the Defendants used the programs to assure that there was no disparate impact in neighborhoods. For example: As the National Underwriting Manager, Anne Marie Dean, who is still in that position with Defendant Bank of America and had been in a similar position with Defendant Countrywide in sworn statements and in her role as the national underwriting manager, she stated that: she was not familiar with underwriting subprime loans nor was she familiar with corporate quality control guidelines. *See* Deposition Transcript of Anne Marie Dean dated September 9, 2020 ("Dean Tr."), at 51:6-7 ("I'm not familiar with the subprime.") and at 51:21-52:3 (Q: Are you familiar with guidelines related to corporate quality control? A: No."). Ms. Dean further testified that she did not know what "underwriting standards" were,[40] nor was she familiar with the phrase 'overrides' when used in the context of overriding AUS and manual underwriting procedures decisioning. Indeed, Dean testified flat out "no" she did not know what overrides meant in that context,[41] further stating that "I don't recall anything related to overrides, the term 'overrides.'"[42] Dean also claimed that every loan went through the AUS,[43] underwriters input all of the factual data such as income and bank

[40] Dean Tr. at 35:16-19.
[41] Id. at 36:14.
[42] Id. at 44:9-11.
[43] Id. at 38:17-39:15.

statements,[44] therefore the underwriter would know if an applicant with a fixed income should not qualify for any stated income/assets or reduced documentation product. Dean was also not familiar with the CMD credit authority and responsibilities document[45] that described what an underwriter can do relative to exceptions.[46]

Compensation and Incentive Plan for Underwriters Primarily Based on Volume Not Quality

Cindi Graveline-Thomas, administered compensation plans for the Consumer Markets Division, specifically the retail loan officers and Full Spectrum Lending and Wholesale Lending Division. During her deposition, Ms. Thomas testified that the compensation of underwriters in Countrywide's Full Spectrum Lending Division from 2004 to 2007 was based in part on the volume of loans they underwrote, and they were incentivized based on quantity not quality of the loans they funded. the underwriters were incentivized based upon the number of loans they reviewed.[47] The compensation of CMD underwriters at Countrywide between 2004 and 2007 was based in part on the number of loans they underwrote and the compensation of WLD underwriters at Countrywide between 2004 and 2007 was based in part on the number of loans they underwrote.[48] Countrywide incentivized to underwrite by volume[49] (plan only applies to underwriting centers in Chicago, Phoenix, Plano, and Ft. Worth). The underwriter bonus pays four times more for a 'Clues' refer (8 points) versus only 2 points for an accept.

Compensation and Incentive Plan for Loan Originators Primarily Based on Volume Not Quality

Compensation to loan originators at Full Spectrum Lending (FSL) rom 2004-2007 based in part on the number of loans originated.[50] Thomas confirmed that FICO scores of borrowers affected the compensation of loan originators, and that the lower the FICO score, the higher the compensation points earned.[51] Compensation to loan originators at Consumer Markets Division

[44] Id. at 41:21–42:5.
[45] Id. at 46:15-47:11.
[46] Id. at 48:6-49:18.
[47] Deposition of Cindi Graveline-Thomas, August 26, 2020 ("Thomas Tr.") at 115:4-116:12; 122:17-123:5.
[48] Id. at 117:24-118:20.
[49] BANACC0000156496.
[50] Thomas Tr. at 115:4-116:12.
[51] Id. at 156:12-20; 159:5-161:24.

(CMD) from 2004-2007 based in part on the dollar volume of loans originated.[52] Loans with higher interest rates resulted in more compensation for loan originators, loan officers would share 'overages'(split 50/50), and the compensation plan for the retail section of Consumer Markets Division in the period of 2004 to 2007 provided an incentive for a loan originator to make a price adjustment in the loan, the loans they generated.[53] Regarding 'underages' the loan officers compensation took a 100% hit.[54] Therefore, loan originators were incentivized to never have an underage.

Defendants' Employees and Brokers Were Incentivized to Generate Lower FICO Score Loan Volume and Subprime/'Risky' Loans Countrywide's commission structure and written incentive plans, rewarded sales representatives and third-party brokers with whom Countrywide did business for generating loans from borrowers with lower FICO scores and getting borrowers to accept riskier, higher-cost loans.[55] For example, Rebecca Steele's testimony confirmed that Countrywide rewarded employees with higher compensation based on generating lower FICO score loans because, as she acknowledged "subprime volume is critical"[56]

In addition, Joseph Miller, former Managing Director of National Operations of Countrywide's Wholesale Lending Division and member of its Fair Lending Committee, testified that Countrywide had a higher cap on compensation brokers could earn for generating subprime/nonprime loans versus prime loans.[57]

Bank of America's Analyses Comparing Borrower Race and Loan Product Broker Compensation Evidence Disparate Treatment Bank of America provided an analysis by race and loan product Broker Compensation and overage/underage for the period January 1, 2006 through June 30, 2006.[58] This document indicates the average amount of total broker compensation expressed as points was: Whites was 1.49; for African Americans 1.83; and for

[52] Id. at 25:21-27:21.
[53] Id. at 31:7-33:20.
[54] Id. at 33:8-10.
[55] BANACC0000183874; BANACC0000194516
[56] Deposition Transcript of Rebecca Steele dated July 30, 2020 at 54:4-55:12.
[57] Deposition Transcript of Joseph Miller dated September 23, 2020 at 191:5-192:7.
[58] BANACC0000663199

Hispanics 1.79. [59] This means that African Americans and Hispanics paid (or were charged) .34 points and .30 points respectively higher than Whites. The average amount of broker fees was 0.42 points for Whites and 0.78 points for African Americans.[60] Therefore, African Americans paid .35 points higher than Whites compensation. Points paid by the broker to the bank for a lower rate was 0.05 for White applicants, and 0.60 points for African Americans. The points paid by the brokers to the bank for American loans was 12 times higher than the same fee paid for White loans.[61]

The average amount of total points paid (compensation paid to the broker)[62] was 0.48 for Whites, 1.38 for African Americans, and .74 for Hispanics. Therefore, Bank of America paid brokers for African Americans loans 0.9 points more than Whites and Hispanics paid more than Whites. for African. This another example of Bank of America incentivizing brokers to target minority neighborhoods. The average amount of compensation paid for 'Priority Brokered loans' was 1.46 points for Whites; 1.98 points for African Americans; and 1.72 points for Hispanics.[63] African Americans paid .52 points more than White loans, and .26 points more than Whites for Hispanic loans.[64]

The average amount of compensation paid to the broker for 'Non-Priority Brokered loans' was 0.56 points for Whites; 1.88 points for African Americans; and 0.89 for Hispanics.[65] African Americans paid 1.32 points more than White loans, and .33 points more than Whites for Hispanic loans.[66] This another example of Bank of America incentivizing brokers to target minority neighborhoods. For Conforming Loans,[67] the average amount of total points the bank compensated the broker for White loans was 0.48, for African Americans loans 1.40, and for Hispanic loans 0.75. Therefore, the broker compensation for conforming loans was almost a full point more for African American loans than White loans. This another example of Bank of

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[59] Id.
[60] Id.
[61] Id.
[62] Id.
[63] Id.
[64] Id.
[65] Id.
[66] Id.
[67] Id.

America incentivizing brokers to target minority neighborhoods. There are dozens of additional examples just like the previous analysis in my report.

Para 54-83. I agree with Ms. Stedman that Defendants had all of the right manuals in place, guidance prepared, and training for staff, but any controls of processes, policies, practices and accountability in almost every category were absent in my opinion based upon the resulting data, high foreclosure rate, and sworn statements from the people in charge, at the time, for the Defendants.

Respectfully Submitted,

January 13, 2021

Gary E. Lacefield