U.S. Department of
JUSTICE

The Justice Department's 2023 Annual Report to Congress On Fair Lending

December 2024

Civil Rights Division

Message from the Assistant Attorney General for Civil Rights

When we launched the Combating Redlining Initiative in 2021, Attorney General Garland and I made a promise: to send a clear message that discriminatory lending practices based on race or national origin would not be tolerated. As the Initiative enters its third year, I'm proud to say that we've delivered on that promise.

The Justice Department has secured unprecedented relief for communities of color nationwide. In 2023 and early 2024, we resolved eight major redlining cases, delivering nearly $78 million in relief to those most affected by discriminatory practices. From Rhode Island to California, our work is making it possible for more families to achieve the dream of homeownership, build wealth, and transform their futures. Since 2021, the Combating Redlining Initiative has resolved fifteen cases, with over $150 million in relief for underserved communities. This is about more than numbers—it's about lives changed, neighborhoods revitalized, and opportunities restored.

These achievements were possible thanks to strong partnerships with federal financial regulators, United States Attorneys' Offices, and State Attorneys General. In 2023, we saw a surge in referrals involving race or national origin discrimination—evidence that our commitment resonates across the enforcement landscape. Together, we are exposing modern-day redlining for what it is: a barrier to equal opportunity that we refuse to let stand. We have also taken action to protect the rights of servicemembers so they can focus on their military responsibilities without facing adverse financial consequences for themselves or their families.

I am honored to present this report, which details the Civil Rights Division's accomplishments in fair lending enforcement under the Equal Credit Opportunity Act and critical work under the Fair Housing Act and the Servicemembers Civil Relief Act. Our mission is simple: to ensure that every qualified borrower has a fair chance to access credit and opportunity. We will not rest until that mission is fulfilled.

Kristen Clarke

Assistant Attorney General for Civil Rights

I. COMBATING REDLINING INITIATIVE

"Modern-day redlining is a stain on our economy and underscores the need to keep pushing for equal economic opportunity and racial justice in our country. The Justice Department stands ready to hold banks and financial institutions accountable to ensure that communities of color are not shut out of access to mortgage credit due to modern-day redlining."

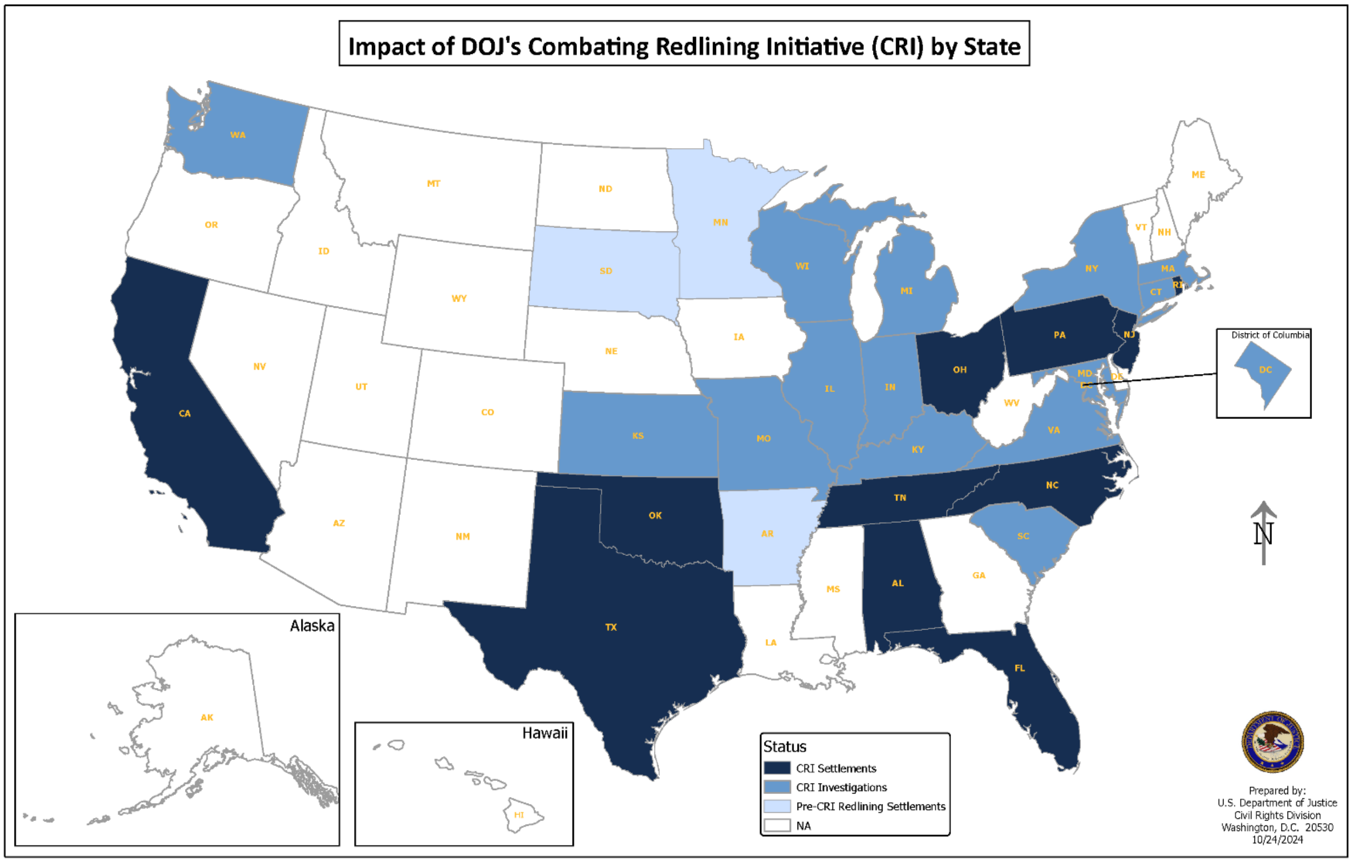
Assistant Attorney General Kristen Clarke
Civil Rights Division
On the announcement of the filing of U.S. and State of North Carolina v. First National Bank of Pennsylvania
February 5, 2024

As the Justice Department's Combating Redlining Initiative enters its third year, it is keeping its promise to bring fair access to credit to communities of color throughout the United States.

As announced at the initiative's launch in October 2021, the department committed to addressing the pervasive problem of redlining in partnership with United States Attorneys' Offices, state Attorneys General, and federal financial regulators.

The Combating Redlining Initiative has continued to yield significant results. From October 2021 to October 2024, the department's redlining settlements total more than $150 million, with more than $134 million in loan subsidy funds alone. This much-needed credit and capital is expected to generate over $1 billion in investment in previously redlined communities.

These efforts build on the department's prior redlining settlements and have resulted in investigations and settlements nationwide, as demonstrated by the figure below.



As discussed in more detail below, the department's cases in 2023 and early 2024 represent a range of lenders, depository and non-depository, and coordination with a range of partners, from United States Attorneys' Offices to the Consumer Financial Protection Bureau (CFPB).

II. FAIR LENDING ENFORCEMENT

The Equal Credit Opportunity Act (ECOA) prohibits creditors from discriminating against credit applicants, including discouraging applications for credit on the basis of race, color, religion, national origin, sex, marital status, or age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act. The Fair Housing Act (FHA) prohibits discrimination in home mortgage loans, home improvement loans, and other home credit transactions because of race, color, religion, sex, national origin, familial status, or disability.

The Justice Department has the authority to prosecute a pattern or practice of discrimination under both ECOA and the FHA on its own initiative or upon referral from another federal agency. This authority extends to discrimination in the mortgage market, including redlining and discriminatory underwriting and pricing. The department's ECOA authority also extends to discrimination in non-mortgage lending contexts like auto loans, unsecured consumer loans, student loans, and credit card products.

In 2023 and through February 2024, the department filed and settled eight redlining cases, litigated a ninth case involving predatory targeting, and filed a statement of interest alleging a discriminatory appraisal.

2023 and Early 2024 Redlining Filings and Settlements

Continuing our efforts to combat redlining, the department filed and settled eight redlining cases. We reported on two of these cases, *United States v. City National Bank* and *United States v. Park National Bank*, in our 2022 ECOA report to Congress, dated November 2023.

ESSA Bank & Trust

On May 31, 2023, the department announced the filing and settlement of a case in the Middle District of Pennsylvania against ESSA Bank & Trust (ESSA). The complaint alleged that from at least 2017 to 2021, ESSA engaged in a pattern or practice of redlining discrimination because it failed to provide mortgage lending services and did not serve the credit needs of majority-Black and Hispanic neighborhoods in the Philadelphia metropolitan area.

Under the consent order entered by the court, ESSA will:

- invest at least $2.92 million in a loan subsidy fund to increase access to credit for home mortgage, improvement and refinance loans, as well as home equity loans and lines of credit, in majority-Black and Hispanic neighborhoods in the bank's lending area;

- spend an additional $125,000 on community partnerships and $250,000 on advertising, outreach, consumer financial education and credit counseling to expand the bank's services in majority-Black and Hispanic communities;

- hire two new mortgage loan officers to serve its existing branches in West Philadelphia; and

- conduct a research-based market study to help identify the needs for financial services in communities of color.

The Federal Deposit Insurance Corporation, the bank's regulator, referred the case to the department.

American Bank of Oklahoma

On August 28, 2023, the department announced the filing and settlement of a case in the Northern District of Oklahoma against American Bank of Oklahoma. The complaint alleged that from 2017 through at least 2021, American Bank of Oklahoma failed to provide mortgage lending services to majority-Black and Hispanic neighborhoods in the Tulsa metropolitan area. Specifically, the department alleged that all American Bank of Oklahoma's branches and loan production offices were located in majority-white neighborhoods, that the bank designated a service area that excluded all majority-Black and Hispanic-census tracts in the metropolitan area, and that the bank failed to monitor and address fair lending risk appropriately.

Under the consent order entered by the court, American Bank of Oklahoma agreed to:

- invest at least $950,000 in a loan subsidy fund for residents of majority-Black and Hispanic neighborhoods in the Tulsa area; $100,000 for advertising, outreach, and consumer education; and $100,000 for the development of community partnerships to provide services that increase access to residential mortgage credit;

- open a new community-oriented loan production office in the historically Black area of Tulsa;
- ensure at least two mortgage loan officers are dedicated to serving majority-Black and Hispanic neighborhoods in and around Tulsa;
- host at least six consumer financial education seminars per year, with translation and interpretation services in Spanish; and
- employ a full-time director of community lending who will oversee the continued development of lending in neighborhoods of color in the Tulsa area.

The Federal Deposit Insurance Corporation, the bank's regulator, referred the case to the department.

The Washington Trust Company Of Westerly

On September 27, 2023, the department announced the filing and settlement of a case in the District of Rhode Island against the Washington Trust Company (Washington Trust). The complaint alleged that from 2016 through at least 2021, Washington Trust failed to provide mortgage lending services to majority-Black and Hispanic neighborhoods in Rhode Island. Despite expansion across Rhode Island, Washington Trust had never opened a branch in a majority-Black and Hispanic neighborhood. The complaint also alleged that Washington Trust relied on mortgage loan officers working out of only majority-white areas as the primary source for generating loan applications. Washington Trust failed to train or incentivize its lending staff or conduct outreach, marketing and advertising of its mortgage services to compensate for its lack of branches and presence in majority-Black and Hispanic areas. The complaint further alleged that, compared to Washington Trust, over the same six-year period, other banks received nearly four times as many loan applications each year in majority-Black and Hispanic neighborhoods in Rhode Island. The complaint also alleged that, even when Washington Trust generated loan applications from majority-Black and Hispanic areas, the applicants themselves were disproportionately white.

The court entered a consent order submitted by the parties where Washington Trust agreed to:

- invest at least $7 million in a loan subsidy fund to increase access to home mortgage, home improvement, home refinance and home equity loans and lines of credit for residents of majority-Black and Hispanic neighborhoods in Rhode Island;
- spend $1 million on community partnerships to provide services that increase residential mortgage credit access for residents of those neighborhoods;
- spend $1 million for advertising, outreach, consumer financial education and credit counseling focused on majority-Black and Hispanic neighborhoods;
- open two new branches in majority-Black and Hispanic neighborhoods in Rhode Island, and ensure at least two mortgage loan officers are dedicated to serving these neighborhoods; and
- employ a director of community lending who will oversee the continued development of lending in communities of color.

The department, through its Combating Redlining Initiative, identified and developed this case.

Ameris Bank

On October 19, 2023, the Combating Redlining Initiative surpassed the $100 million mark in relief obtained for communities of color with the filing and settlement in the Middle District of Florida against Ameris Bank (Ameris). The complaint alleged that from 2016 through 2021, Ameris avoided providing mortgage services to majority-Black and Hispanic neighborhoods in Jacksonville and discouraged people seeking credit in those communities from obtaining home loans. Ameris' home mortgage lending was focused disproportionately on white areas of Jacksonville, while other lenders generated applications in majority-Black and Hispanic neighborhoods at three times the rate of Ameris. Although Ameris operates 18 branches in Jacksonville, Ameris has never operated a branch in a majority-Black and Hispanic neighborhood in the city.

Under the proposed consent order approved by the court, Ameris will:

- invest $7.5 million in a loan subsidy fund that will be made available to residents of majority-Black and Hispanic neighborhoods and those seeking credit in those communities;

- invest $900,000 for advertising and outreach targeted toward the residents of these neighborhoods;
- invest $600,000 to develop community partnerships to provide services that increase access to residential mortgage credit;
- open a new branch in a majority-Black and Hispanic neighborhood in Jacksonville;
- ensure that at least three mortgage loan officers are dedicated to serving majority-Black and Hispanic neighborhoods;
- retain a consultant to assess the bank's compliance management system as it pertains to redlining risk; and
- employ a full-time director of community lending who will oversee the continued development of lending in Jacksonville's majority-Black and Hispanic neighborhoods.

The department, through its Combating Redlining Initiative, identified and developed this case.

Patriot Bank

On January 17, 2024, the department announced the filing and settlement of a case in the Western District of Tennessee against Patriot Bank (Patriot). The complaint alleged that from 2015 through at least 2020, Patriot avoided providing mortgage services to majority-Black and Hispanic neighborhoods in Memphis and discouraged people seeking credit in those communities from obtaining home loans. Patriot's home mortgage lending was disproportionately focused on white areas around Memphis.

The court entered the consent order submitted by the parties under which Patriot will:

- invest at least $1.3 million in a loan subsidy fund to increase access to home mortgage, home improvement, and home refinance for residents of majority-Black and Hispanic neighborhoods;
- spend $375,000 for advertising, outreach, consumer financial education and credit counseling focused on majority-Black and Hispanic neighborhoods;

- spend $225,000 on community partnerships to provide services that increase residential mortgage credit access for residents of those neighborhoods;

- ensure at least two mortgage loan officers are dedicated to serving majority-Black and Hispanic neighborhoods in the Bank's service area;

- employ a director of community lending who will oversee the continued development of lending in communities of color; and

- continuously assess the communities' credit needs throughout the term of the consent order.

The Federal Reserve Board, the bank's regulator, referred this case to the department.

First National Bank of Pennsylvania

In a joint filing with the State of North Carolina, on February 5, 2024, the department announced the filing and settlement of a case in the Middle District of North Carolina against the First National Bank of Pennsylvania (First National). The joint complaint alleged that from 2017 through 2021, First National, including as successor in interest to Yadkin Bank, which it acquired in 2017, failed to provide mortgage lending services to predominantly Black and Hispanic neighborhoods in Charlotte and Winston-Salem, and discouraged people seeking credit in those communities from obtaining home loans. First National's home mortgage lending was focused disproportionately on white areas of Charlotte and Winston-Salem. The bank's branches in both cities were also overwhelmingly located in predominantly white neighborhoods, with the bank closing its sole branch in a predominantly Black and Hispanic neighborhood in Winston-Salem in 2021.

The matter was resolved through two consent orders, which require First National to:

- invest at least $11.75 million in a loan subsidy fund to increase access to home mortgage, home improvement and home refinance loans for residents of majority-Black and Hispanic neighborhoods in First National's Charlotte and Winston-Salem service areas;

- spend $1 million on community partnerships to provide services related to credit, consumer financial education, homeownership and foreclosure prevention for residents of predominantly Black and Hispanic neighborhoods in those service areas;

- spend $750,000 for advertising, outreach, consumer financial education and credit counseling focused on predominantly Black and Hispanic neighborhoods in those service areas;

- open three new branches in predominantly Black and Hispanic neighborhoods in Charlotte and Winston-Salem (two in Charlotte and one in Winston-Salem), with at least one mortgage banker assigned to each branch;

- hire a director of community lending who will oversee the continued development of lending in communities of color; and

- agreed to retain independent consultants to enhance its fair lending program and better meet the communities' needs for mortgage credit.

The department, through its Combating Redlining Initiative, identified and developed this case.

2023 Other Filings, Settlements, and Statements

- On December 20, 2023, the department and the Consumer Financial Protection Bureau announced the filing of *CFPB and US v. Colony Ridge Development, LLC,* in the Southern District of Texas. The department charged the defendants, a Texas-based developer and lender, with violating the FHA and ECOA by operating an illegal land sales scheme and targeting tens of thousands of Hispanic borrowers with false statements and predatory loans.

  Litigation is ongoing.

- On March 23, 2023, the department and its interagency partners marked the first anniversary of the Interagency Task Force on Property Appraisal and Valuation Equity (PAVE). PAVE's mission is to reduce barriers to homeownership and erode the influence of bias on the entire U.S. economy by leveling the playing field in the home appraisal process. As part of the anniversary, the White House issued this fact sheet highlighting PAVE's work.

- On March 13, 2023, the department, joined by the CFPB, filed a statement of interest in *Connolly v. Lanham*, a private lawsuit filed in the District of Maryland, in response to one defendant's motion to dismiss. The complaint alleged that an appraiser and a lender violated the FHA and ECOA by lowering the valuation of a home because the owners were Black and denying a mortgage refinancing application based on that appraisal. The statement of interest explains that it is illegal for a lender to rely on an appraisal that it knows or should know to be discriminatory. It also provides guidance on pleading standards under the FHA and ECOA. On August 2, 2023, the Court issued an opinion granting in part and denying in part defendants' motions to dismiss. The Court agreed that a lender violates the law by relying on an appraisal that it knows or should know to be discriminatory, adopted the pleading standards in the statement of interest, and held that plaintiffs stated claims for relief under ECOA and multiple provisions of the FHA.

Ongoing Compliance

As part of compliance, department staff work with bank counsel or staff to review the progress made under the loan subsidy fund, assess the credit needs of the relevant geographies by considering the findings of the community credit needs assessment reports prepared, and generally monitor the banks' compliance with the consent order requirements.

In addition to conducting compliance in the eight filed cases reported here, Department staff continue to monitor compliance in four cases filed before 2023.

III. REFERRALS

Under ECOA, the bank regulatory agencies must refer matters to the Justice Department when they have reason to believe a lender has engaged in a pattern or practice of discrimination. The Federal Trade Commission (FTC) may also refer lending matters to the department under ECOA. Several agencies, including the Department of Housing and Urban Development (HUD), refer similar matters to the department under the FHA. From 2001 through 2023, the bank regulatory agencies, the FTC, and HUD referred 557 matters involving a potential pattern or practice of lending discrimination to the department. Of these referrals, 197 involved discrimination on the basis of race or national origin.

In 2023, the department received 37 fair lending referrals: eighteen from the Consumer Financial Protection Bureau (CFPB), seven from the Federal Deposit Insurance Corporation (FDIC), six from the National Credit Union Administration (NCUA), five from the Office of the Comptroller of the Currency (OCC), and one from the Federal Reserve Board. When the department receives a referral from a regulatory agency, it determines whether to open an investigation or return the matter to the regulator for administrative enforcement.

Factors Considered When Evaluating Referrals

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

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

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

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

These considerations also apply to matters originating under the department's independent authority to initiate investigations.

2023 Referrals

Of the 37 fair lending matters referred to the department in 2023, 25 involved discrimination on the basis of race or national origin, and the rest, as outlined in the charts appended to this report, involved various types of protected classes. The referrals involved a range of alleged discriminatory conduct, including redlining and discriminatory underwriting and pricing.

The department returned 24 of the 37 referrals to the referring agency for enforcement without opening an investigation. This number includes matters where the agency specifically requested we defer to it for administrative enforcement. For each returned referral, the department evaluated the facts and circumstances of the matter in light of the factors described above. The returned referrals are also described by the agency in the charts following this report.

IV. LENDING RIGHTS OF SERVICEMEMBERS

Upholding the rights of those who serve our nation in the military is a priority of the Justice Department and Civil Rights Division. The Servicemembers Civil Relief Act (SCRA) protects the housing and credit rights of servicemembers so they can focus their full attention on their military responsibilities without adverse financial consequences for themselves or their families. The SCRA's benefits and protections include a six percent interest rate cap on financial obligations that were incurred before a period of military service, the ability to postpone civil court proceedings, protections related to default judgments, protections pertaining to residential and motor vehicle lease terminations, and special requirements related to evictions, mortgage foreclosures, repossessions, and installment contracts, including auto loans.

The division's enforcement of the SCRA provides critical protections to the servicemembers who make great personal sacrifices for our country. No one should return from military service to find their credit ruined, their car repossessed, or their home loan foreclosed in violation of the SCRA.

In addition to filing lawsuits under the Servicemembers Civil Relief Act (SCRA), the Justice Department files statements of interest in private lawsuits. *See* 28 U.S.C. § 517 (authorizing the department to attend to the interests of the United States in suits pending in federal and state courts).

On March 2, 2023, the Department of Justice filed statements of interest in two private cases pending in the Eastern District of North Carolina: *Espin v. Citibank, N.A.* and *Padao v. American Express National Bank*. Both cases are private class action lawsuits alleging, among other things, that credit card issuers failed to properly apply the SCRA's 6% interest rate cap to servicemembers' pre-service debts. In both cases, the bank moved to compel the lead plaintiff to engage in an individual arbitration proceeding instead of a class action lawsuit. The department's statements of interest argued that the plaintiffs were entitled to pursue their class claims in federal court – and were not required to submit to individual arbitration – because the SCRA allows plaintiffs to do so "notwithstanding any previous agreement to the contrary." Mandatory individual arbitration can pose particular difficulties for servicemembers, who may be unable to pursue their claims while devoting their time and energy to serving the nation. The federal district court agreed with the position in the department's statements of interest and denied the motions to compel individual arbitration. The ruling in the Espin case is currently being appealed to the Fourth Circuit.

Since 2011, the Civil Rights Division—with U.S. Attorneys' Offices nationwide—has obtained over $481 million in monetary relief for over 147,000 servicemembers through its SCRA enforcement efforts.

Servicemembers and Veterans Initiative

In 2014, the department established the Servicemembers and Veterans Initiative (SVI or Initiative) to support its critical enforcement efforts and work with other federal agencies to better serve the military community by sharing information, identifying servicemember and veteran needs, and coordinating the distribution of resources.

The Justice Department is committed to robust enforcement of the Servicemembers Civil Relief Act, both through actions brought by the Attorney General and through servicemembers seeking to vindicate their own rights and the rights of others in federal court.

Assistant Attorney General Kristen Clarke, March 2, 2023

The primary purpose of this Initiative is to facilitate the use of all available resources and legal authorities to support the military community. The Initiative seeks to understand better and address the legal challenges servicemembers face while on active duty, veterans face when returning to civilian life, and their families face when their loved ones are deployed. It also ensures that servicemembers and veterans fully understand their rights and know what to do when those rights are threatened or violated.

SVI also solicits and reviews public complaints regarding the civil rights concerns of servicemembers and veterans. It provides information about the relevant legal protections and how to obtain further assistance. When appropriate, SVI refers matters for further investigation by the department. The department has initiated numerous investigations and cases based on SVI's referrals.

In 2020, Congress passed the SVI Act, which legislatively established the Initiative within the department's Civil Rights Division and expanded its mission and responsibilities. The SVI Act directed SVI to promote policies to support servicemembers and veterans, liaise with military contacts, promote civil legal aid to the military community, and support enforcing federal laws to protect servicemembers and veterans. This Act codified SVI's role within the department. It renewed the department’s resolve to enhance its efforts to protect the civil rights of the military community.

SVI routinely conducts outreach and training for military populations and the groups that serve them, such as veterans’ organizations, military training schools, military legal assistance offices, and law school clinics. It also provides extensive support and training to United States Attorneys’ Offices interested in developing servicemembers' and veterans' practices in their own districts. The Assistant United States Attorneys whom SVI trains are able to perform targeted outreach tailored to maximally benefit their local communities.

Much of this outreach is specifically focused on consumer protection and financial rights. In 2023, SVI coordinated and supported over 45 events, meetings, and training sessions throughout the nation regarding military lending rights. These presentations reached active-duty members and veterans of all six branches of the military, reserve components, and the National Guard, as well as military families, state and federal agencies, and outside advocacy groups supporting the military community. The outreach has included sessions at The Judge Advocate General’s Legal Center, the School’s annual Legal Assistance Course, and training on military bases nationwide. Of particular note in 2023, SVI:

- provided testimony before the Senate Committee on Veterans’ Affairs regarding the department’s consumer protection efforts on behalf of the military community;
- conducted its first training specifically for financial professionals serving the military community on federal consumer protection rights and financial benefits for military families;
- visited and conducted training at MacDill Air Force Base in Florida and Andrews Air Force Base in Guam, which included instruction on military lending rights;
- trained Air Force JAGs at their Annual Survey of the Law and provided virtual training to all Air Force Legal Assistance Attorneys on consumer protection rights for servicemembers and their families; and
- provided training at the Army, Air Force, and Navy JAG Schools on SCRA protections.

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

In 2023, the Justice Department continued collaborating with federal and state partners through interagency engagement, joint investigations, and outreach efforts. The Civil Rights Division participates in the federal Interagency Task Force on Fair Lending. This task force meets bimonthly to discuss emerging fair lending issues, share methods of identifying potential violations, and coordinate approaches to fair lending issues. These meetings promote consistency among agencies and address common problems that arise in referrals to the department, allowing the participants to benefit from other agencies' perspectives and experiences. The division also met with civil rights chiefs at State Attorneys General offices nationwide to discuss the department's Combating Redlining Initiative and identify collaboration opportunities.

Civil Rights Division Partners

Bank regulatory agencies

- CFPB - Consumer Financial Protection Bureau
- FDIC - Federal Deposit Insurance Corporation
- FRB – Federal Reserve Board
- NCUA – National Credit Union Administration
- OCC – Office of the Comptroller of the Currency

Other partners

- FHFA – Federal Housing Finance Agency
- FTC - Federal Trade Commission
- HUD – Department of Housing and Urban Development

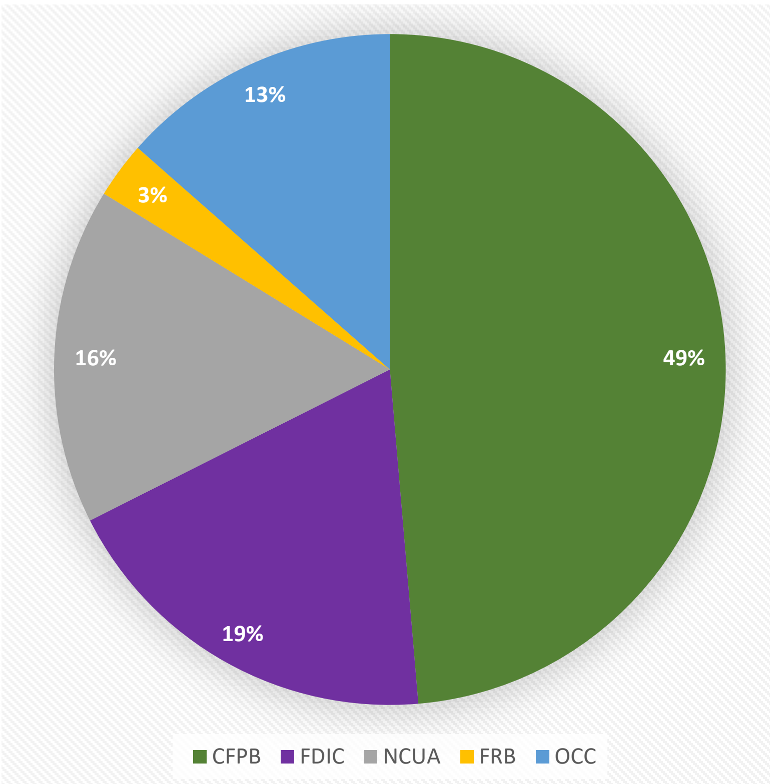
Division representatives also regularly participate in conferences, training programs, and meetings involving lenders, compliance officials, industry experts, enforcement and regulatory agencies, consumer groups, and others. These outreach activities are meaningful opportunities to inform stakeholders and interested parties about the department's fair lending enforcement activities. In 2023, Division staff participated in 21 such events. Additionally, in 2023, the department participated in a national, public webinar hosted by the FRB for the twelfth year in a row.

VI. CONCLUSION

As the department enters its third year of the Combating Redlining Initiative, we continue to amass unprecedented relief for communities of color. With relief over $150 million since 2021, the department has made good on its promise to pursue and remedy systemic lending discrimination aggressively. We remain steadfast in our commitment to these efforts. The department also continues to vigorously enforce all the protections afforded to servicemembers by the Servicemembers Civil Relief Act and to do extensive outreach on those protections through the Servicemembers and Veterans Initiative.

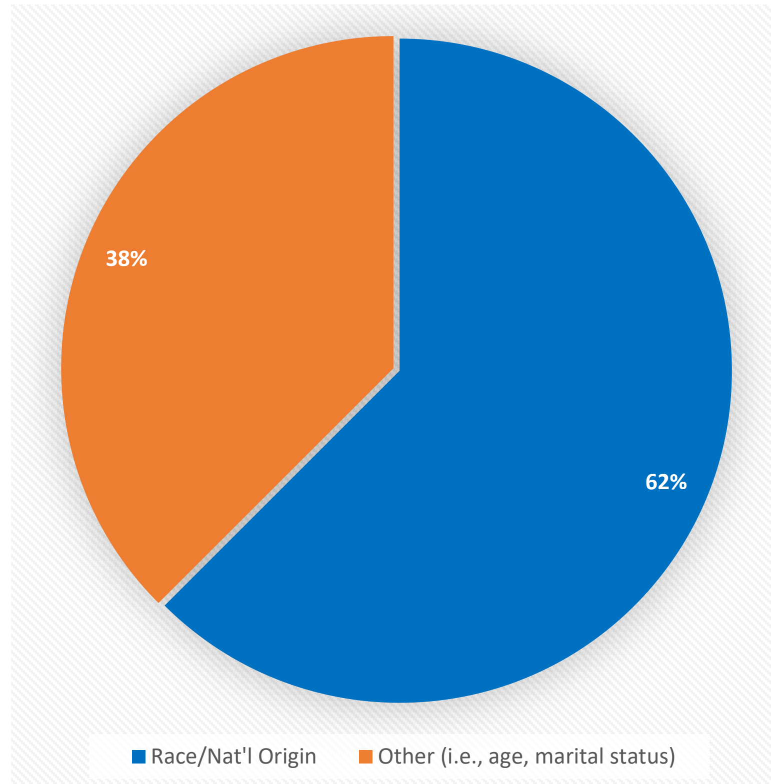
2023 Fair Lending Referrals to the Justice Department

Referrals by Agency

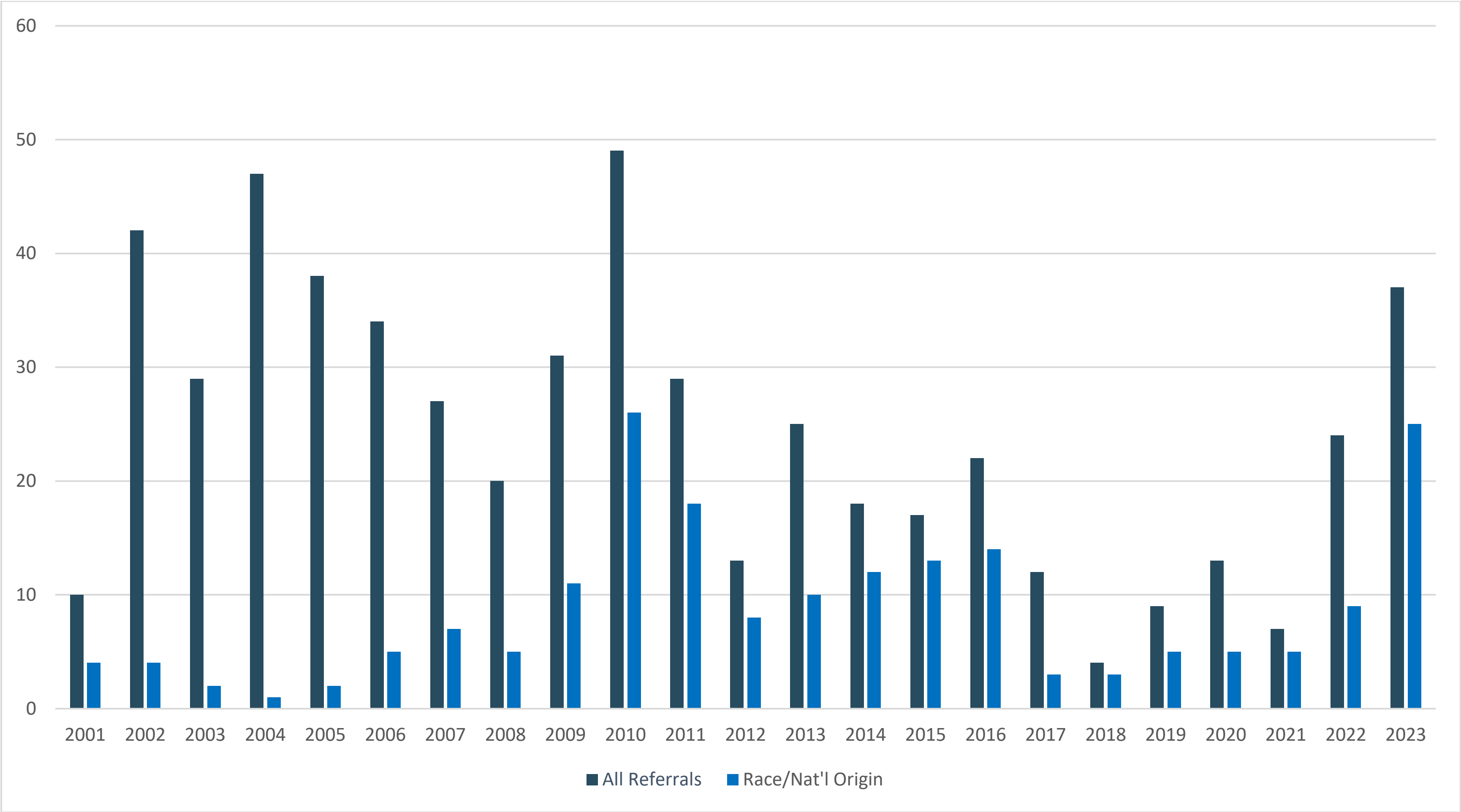


Total of 37 referrals, the FTC and HUD made no referrals

Referrals by Protected Class



Historical Fair Lending Referrals to the Justice Department



2023 Fair Lending Referrals to DOJ

Federal Agency	2023 Referrals by Protected Class	2023 Referrals Resulting in DOJ Investigations	2023 Referrals Returned to Agency	Referrals Pending from Prior Years as of December 31, 2023
CFPB	*18 total*	*6*	*12*	*2*
	4 race/national origin: redlining 1 race/national origin: redlining, credit cards 1 race/national origin: predatory targeting 2 race/national origin: pricing exceptions 2 race/national origin/sex: pricing exceptions 1 race/national origin/sex/age: pricing exceptions 1 race/age: pricing exceptions 1 race/age/sex: pricing exceptions 1 national origin: credit cards 4 source of income: underwriting	Under joint investigation: 4 race/national origin: redlining Under review: 1 race/national origin: redlining, credit cards In joint litigation:1 race/national origin: predatory targeting: *CFPB and US v. Colony Ridge*	2 race/national origin: pricing exceptions 2 race/national origin/sex: pricing exceptions 1 race/national origin/sex/age: pricing exceptions 1 race/age: pricing exceptions 1 race/age/sex: pricing exceptions 1 national origin: credit cards 4 source of income: underwriting	1 race/national origin: pricing 1 race/national origin: redlining
FDIC	*7 total*	*2*	*5*	*1*
	3 race/national origin: redlining 1 race: redlining 1 race/color/national origin/religion: redlining 1 race/national origin: pricing, indirect auto loans 1 gender: pricing, vehicle secured loans	1 race/national origin: redlining Under review: 1 race/national origin: redlining	1 race/national origin: redlining 1 race: redlining 1 race/color/national origin/religion: redlining 1 race/national origin: pricing, indirect auto loans 1 gender: pricing, vehicle secured loans	1: race: underwriting

2023 Fair Lending Referrals to DOJ (continued)

Federal Agency	2023 Referrals by Protected Class	2023 Referrals Resulting in DOJ Investigations	2023 Referrals Returned to Agency	Referrals Pending from Prior Years as of December 31, 2023
FRB	*1 total* 1 marital status: spousal signature	*0*	*1* 1 marital status: spousal signature	*1* 1 race/national origin: redlining *US v. Patriot Bank* Filed January 17, 2024
NCUA	*6 total* 5 age: underwriting 1 marital status: underwriting	*0*	*6* 5 age: underwriting 1 marital status: underwriting	*0*
OCC	*5* 5 race/color/national origin: redlining*	*5* 5 race/color/national origin: redlining	*0*	*1* 1: race/color/national origin: redlining

* Four of these referrals were made under the FHA only; the fifth one was made under ECOA and the FHA.

Federal Agency	2023 Referrals by Protected Class	2023 Referrals Resulting in DOJ Investigations	2023 Referrals Returned to Agency	Referrals Pending from Prior Years as of December 31, 2023
FTC	*0*	*0*	*0*	*0*
HUD			*0*	*0*

Fair Lending Referrals to DOJ 2001-2023
All Referrals

All Referrals	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	TOTAL
Bank Regulatory Agencies																								
CFPB	–	–	–	–	–	–	–	–	–	–	0	1	6	15	8	8	2	0	3	4	2	5	18	**72**
FDIC	5	33	29	42	35	29	15	12	21	33	14	8	11	3	4	4	4	1	2	3	2	12	7	**329**
FRB	1	6	0	3	2	5	9	3	6	6	7	2	6	0	4	7	3	0	1	2	1	1	1	**76**
NCUA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	1	3	2	5	6	**20**
OTS*	1	0	0	1	0	0	3	4	4	6	4	–	–	–	–	–	–	–	–	–		–	–	**23**
OCC	3	1	0	0	0	0	0	1	0	2	1	1	1	0	0	1	1	1	2	1	0	1	5	**22**
Other Partners																								
HUD	0	2	0	1	1	0	0	0	0	2	1	1	1	0	1	2	0	1	0	0	0	0	0	**13**
FTC	–	–	–	–	–	–	–	–	–	–	2	0	0	0	0	0	0	0	0	0	0	0	0	**2**
TOTAL	**10**	**42**	**29**	**47**	**38**	**34**	**27**	**20**	**31**	**49**	**29**	**13**	**25**	**18**	**17**	**22**	**12**	**4**	**9**	**13**	**7**	**24**	**37**	**557**

*On July 21, 2011, the CFPB launched and the Office of Thrift Supervision (OTS) was merged into the OCC.
"-" indicates there is no entry for that agency in the ECOA report for that year.

Fair Lending Referrals to DOJ 2001-2023
Race/National Origin Referrals

Race/Nat'l Origin	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	TOTAL
Bank Regulatory Agencies																								
CFPB	—	—	—	—	—	—	—	—	—	—	0	0	2	10	7	7	1	0	2	3	2	4	**14**	**52**
FDIC	2	1	2	0	1	3	1	2	5	14	10	5	5	2	3	2	1	1	0	0	2	4	**6**	**72**
FRB	1	1	0	0	0	2	4	0	3	4	2	1	3	0	3	3	0	0	1	1	1	0	**0**	**30**
NCUA	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	**0**	**0**
OTS*	1	0	0	0	0	0	2	3	3	4	3	—	—	—	—	—	—	—	—	0		—	—	**16**
OCC	0	0	0	0	0	0	0	0	0	2	1	1	0	0	0	0	1	1	2	1	0	1	**5**	**15**
Other Partners																								
HUD	0	2	0	1	1	0	0	0	0	2	0	1	0	0	0	2	0	1	0	0	0	—	0	**10**
FTC	—	—	—	—	—	—	—	—	—	—	2	0	0	0	0	0	0	0	0	0	0	—	0	**2**
TOTAL	**4**	**4**	**2**	**1**	**2**	**5**	**7**	**5**	**11**	**26**	**18**	**8**	**10**	**12**	**13**	**14**	**3**	**3**	**5**	**5**	**5**	**9**	**25**	**197**

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