

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO. 1:12-cv-01150
	)	
v.	)	
	)	
WELLS FARGO BANK, NA,	)	
	)	
	)	
Defendant.	)	
_____	)	

**NOTICE REGARDING ADDITIONAL MONETARY RELIEF**

As required by Paragraph 37 of the Consent Order (Dkt. Entr. 2-1), Wells Fargo conducted its internal review, using the parties' agreed-upon statistical model and process, to determine whether there exist African-American and/or Hispanic borrowers who received nonprime Wells Fargo loans from Wells Fargo's retail channel who, based on the results of the statistical model, arguably might have qualified for prime loans from Wells Fargo's retail channel. As a result of this internal review, Wells Fargo identified 3,990 African American and/or Hispanic retail nonprime borrowers eligible for cash rebates in an amount commensurate with the amounts paid to borrowers who received nonprime Wells Fargo loans from Wells Fargo's wholesale division. The parties agreed that this amounts to an average of \$14,850 per borrower. Accordingly, on December 13, 2012, Wells Fargo deposited a total of \$59,251,500 in an escrow-bearing account and provided written verification of the deposit to the United States. The rules and procedures governing the administration of the rebates will be the same as set forth in Paragraphs 18-24, 26-28, and 36 of the Consent Order.

Dated: December 19, 2012

Respectfully submitted,

RONALD C. MACHEN JR.  
D.C. Bar # 447889  
United States Attorney  
District of Columbia

THOMAS E. PEREZ  
Assistant Attorney General  
Civil Rights Division

DANIEL F. VAN HORN  
D.C. Bar # 924092  
Acting Chief, Civil Division

STEVEN H. ROSENBAUM  
D.C. Bar # 417585  
Chief  
Housing and Civil Enforcement Section  
Civil Rights Division  
JON M. SEWARD  
Deputy Chief  
ELIZABETH PARR HECKER  
HOLLY C. LINCOLN  
Trial Attorneys

\_\_\_\_\_/s/\_\_\_\_\_  
JAVIER M. GUZMAN  
D.C. Bar # 462679  
Assistant United States Attorney  
555 Fourth Street, NW  
Washington, DC 20530  
Phone: (202) 616-1761  
Fax: (202) 514-8780  
Javier.Guzman2@usdoj.gov

\_\_\_\_\_/s/\_\_\_\_\_  
COTY R. MONTAG  
D.C. Bar # 498357  
Trial Attorney  
Housing and Civil Enforcement Section  
Civil Rights Division  
United States Department of Justice  
950 Pennsylvania Avenue, NW  
Northwestern Building, 7th Floor  
Washington, DC 20530  
Phone: (202) 305-0122  
Fax: (202) 514-1116  
Coty.Montag@usdoj.gov