

APPENDIX A

APPENDIX

Plaintiffs examined REO properties owned and maintained by Defendants in the following metropolitan areas: (1) Atlanta, GA.; (2) Baltimore, MD; (3) Baton Rouge, LA; (4) Birmingham, AL; (5) Chicago, IL; (6) Cleveland, OH; (7) Columbus, OH; (8) Dallas, TX; (9) Dayton, OH; (10) Denver, CO; (11) Suburban Detroit, MI; (12) Fort Worth, TX; (13) Gary, IN; (14) Grand Rapids, MI; (15) Greater Palm Beaches, FL; (16) Hartford, CT; (17) Indianapolis, IN; (18) Kansas City, MO/KS; (19) Louisville, KY; (20) Memphis, TN; (21) Miami/Fort Lauderdale, FL; (22) Milwaukee, WI; (23) Minneapolis, MN; (24) Muskegon, MI (25) New Haven, CT; (26) New Orleans, LA; (27) Newark, NJ; (28) Orlando, FL; (29) Philadelphia, PA; (30) Providence, RI; (31) Richmond, Oakland, and Concord, CA; (32) San Antonio, TX; (33) Tampa, FL; (34) Toledo, OH; (35) Vallejo, CA; (36) Washington, DC and Prince George's County, MD; and (37) Waterbury, CT. Plaintiffs investigated a total of 1,677 properties in these 37 metropolitan areas.

1. ATLANTA, GEORGIA

In the Atlanta, GA metropolitan area, Plaintiffs investigated 116 Bank of America REO properties. Of these 116 REO properties, 92 were located in African-American neighborhoods, 2 were located in predominantly Latino neighborhoods, 9 were located in predominantly non-white neighborhoods, and 13 were located in predominantly white neighborhoods.

- 38.5% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.7% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 89.3% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 61.5% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 47.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 7.8% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 60.2% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 23.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 59.2% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 30.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.8% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 23.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 19.4% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 19.4% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 31.1% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 7.7% of the properties in predominantly white neighborhoods had the same problem.
- 25.2% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 7.7% of the properties in predominantly white neighborhoods had the same problem.
- 22.3% of the REO properties in neighborhoods of color had a damaged roof, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.1% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 27.2% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 7.8% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 83.5% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 38.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 6.8% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 53.4% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 46.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.8% of the REO properties in neighborhoods of color had damaged siding, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 23.3% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 10.7% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 46.6% of the REO properties in neighborhoods of color had a small amount of mold, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 7.8% of the REO properties in neighborhoods of color had a pervasive amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 26.2% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

2. BALTIMORE, MARYLAND

In the Baltimore, MD metropolitan area, Plaintiffs investigated 62 Bank of America REO properties. Of these 62 REO properties, 43 were located in African-American neighborhoods, 1 was located in a predominantly non-white neighborhood, and 18 were located in predominantly white neighborhoods.

- 38.9% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 9.1% of the

REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 90.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 61.1% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 34.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 5.6% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 72.7% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 38.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 52.3% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 38.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 52.3% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 27.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 11.1% of REO properties in predominantly white neighborhoods had the same problem.
- 38.6% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 27.8% of the properties in predominantly white neighborhoods had the same problem.
- 31.8% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 22.2% of the properties in predominantly white neighborhoods had the same problem.
- 54.5% of the REO properties in neighborhoods of color had broken or boarded windows, while only 27.8% of the properties in predominantly white neighborhoods had the same problem.

- 11.4% of the REO properties in neighborhoods of color had a damaged roof, while only 5.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.7% of the REO properties in neighborhoods of color had a damaged fence, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 18.2% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 6.8% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 66.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 11.4% of the REO properties in neighborhoods of color had broken or discarded signage, while only 5.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 38.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.9% of the REO properties in neighborhoods of color had damaged siding, while only 5.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 13.6% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 11.4% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had a small amount of mold, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.

- 9.1% of the REO properties in neighborhoods of color had a pervasive amount of mold, while only 5.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.

3. BATON ROUGE, LOUISIANA

In the Baton Rouge, LA metropolitan area, Plaintiffs investigated 33 Bank of America REO properties. Of these 33 REO properties, 18 were located in African-American neighborhoods and 15 were located in predominantly white neighborhoods.

- 20.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 88.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 80.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 50.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 13.3% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 11.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 61.1% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 13.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.9% of the REO properties in neighborhoods of color had accumulated mail, while only 26.7% of the REO properties in predominantly white neighborhoods had the same problem.

- 66.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 26.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 46.7% of REO properties in predominantly white neighborhoods had the same problem.
- 77.8% of the REO properties in neighborhoods of color had a damaged fence, while only 66.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 13.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had wood rot, while only 26.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 26.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 46.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had damaged siding, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had obstructed gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 50.0% of the REO properties in neighborhoods of color had a small amount of mold, while only 40.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had a pervasive amount of mold, while only 13.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 13.3% of the REO properties in predominantly white neighborhoods had the same problem.

4. BIRMINGHAM, ALABAMA

In the Birmingham, AL metropolitan area, Plaintiffs investigated 29 Bank of America REO properties. Of these 29 REO properties, 21 were located in African-American neighborhoods and 8 were located in predominantly white neighborhoods.

- 100.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 4.8% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 95.2% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 57.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 14.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 71.4% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 76.2% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 76.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.5% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 37.5% of REO properties in predominantly white neighborhoods had the same problem.
- 19.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had unsecured or broken doors, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had damaged steps and handrails, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had broken or boarded windows, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 52.4% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 9.5% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 23.8% of the REO properties in neighborhoods of color had damaged siding, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 23.8% of the REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 9.5% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had obstructed gutters, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had a small amount of mold, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had a pervasive amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 38.1% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

5. CHICAGO, ILLINOIS

In the Chicago, IL metropolitan area, Plaintiffs investigated 90 Bank of America REO properties. Of these 90 REO properties, 39 were located in African-American neighborhoods, 12 were located in predominantly Latino neighborhoods, 12 were located in predominantly non-white neighborhoods, and 27 were located in predominantly white neighborhoods.

- 40.7% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 7.9% of the

REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 92.1% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 59.3% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 47.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 11.1% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 7.9% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 60.3% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 3.7% of the properties in predominantly white neighborhoods had the same problem.
- 25.4% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 7.4% of the properties in predominantly white neighborhoods had the same problem.
- 65.1% of the REO properties in neighborhoods of color had broken or boarded windows, while only 14.8% of the properties in predominantly white neighborhoods had the same problem.
- 27.0% of the REO properties in neighborhoods of color had a damaged roof, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had a damaged fence, while only 22.2% of the REO properties in predominantly white neighborhoods had the same problem.

- 23.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 7.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.6% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 41.3% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 14.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 71.4% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 59.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.5% of the REO properties in neighborhoods of color had graffiti, while only 3.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 54.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 18.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had damaged siding, while only 37.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.7% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 7.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 36.5% of the REO properties in neighborhoods of color had obstructed gutters, while only 25.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 4.8% of the REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 30.2% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.

6. CLEVELAND, OHIO

In the Cleveland, OH metropolitan area, Plaintiffs investigated 23 Bank of America REO properties. Of these 23 REO properties, 14 were located in African-American neighborhoods, 1 was located in a predominantly non-white neighborhood, and 8 were located in predominantly white neighborhoods.

- 25.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 75.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 60.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 25.0% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 13.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 46.7% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had accumulated mail, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 53.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 25.0% of REO properties in predominantly white neighborhoods had the same problem.
- 53.3% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 37.5% of the properties in predominantly white neighborhoods had the same problem.

- 26.7% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 12.5% of the properties in predominantly white neighborhoods had the same problem.
- 73.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 37.5% of the properties in predominantly white neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had a small amount of mold, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color had a pervasive amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 26.7% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.

7. COLUMBUS, OHIO

In the Columbus, OH metropolitan area, Plaintiffs investigated 40 Bank of America REO properties. Of these 40 REO properties, 16 were located in African-American neighborhoods, 4 were located in predominantly non-white neighborhoods, and 20 were located in predominantly white neighborhoods.

- 35.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 95.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 65.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 70.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 40.0% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 45.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 30.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.0% of the REO properties in neighborhoods of color had accumulated mail, while only 35.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 35.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 45.0% of the REO properties in predominantly white neighborhoods had the same problem.

- 20.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 10.0% of REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 20.0% of REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 10.0% of the properties in predominantly white neighborhoods had the same problem.
- 45.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 5.0% of the properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 15.0% of the properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had a damaged fence, while only 35.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 35.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 10.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 35.0% of the REO properties in neighborhoods of color had wood rot, while only 5.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 95.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 80.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 65.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 35.0% of the REO properties in predominantly white neighborhoods had the same problem.

- 40.0% of the REO properties in neighborhoods of color had damaged siding, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.0% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 5.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 5.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 35.0% of the REO properties in neighborhoods of color had obstructed gutters, while only 15.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 45.0% of the REO properties in neighborhoods of color had a small amount of mold, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.0% of the REO properties in neighborhoods of color had a pervasive amount of mold, while only 5.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 45.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 10.0% of the REO properties in predominantly white neighborhoods had the same problem.

8. DALLAS, TEXAS

In the Dallas, TX metropolitan area, Plaintiffs investigated 88 Bank of America REO properties. Of these 88 REO properties, 36 were located in African-American neighborhoods, 33 were located in predominantly Latino neighborhoods, 6 were located in predominantly non-white neighborhoods, and 13 were located in predominantly white neighborhoods.

- 38.5% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.7% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 89.3% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 61.5% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.

- 44.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 15.4% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 6.7% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 60.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 30.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.3% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 72.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 30.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 58.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 38.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 26.7% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 15.4% of REO properties in predominantly white neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color had a broken mailbox, while none of REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 7.7% of the properties in predominantly white neighborhoods had the same problem.
- 12.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the properties in predominantly white neighborhoods had the same problem.

- 32.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 15.4% of the properties in predominantly white neighborhoods had the same problem.
- 49.3% of the REO properties in neighborhoods of color had a damaged fence, while only 38.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.7% of the REO properties in neighborhoods of color had wood rot, while only 30.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.3% of the REO properties in neighborhoods of color were marketed as distressed properties, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 78.7% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 61.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 56.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 38.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 49.3% of the REO properties in neighborhoods of color had damaged siding, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.3% of the REO properties in neighborhoods of color water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 14.7% of the REO properties in neighborhoods of color had a small amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 30.7% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.

9. DAYTON, OHIO

In the Dayton, OH metropolitan area, Plaintiffs investigated 39 Bank of America REO properties. Of these 39 REO properties, 20 were located in African-American neighborhoods and 19 were located in predominantly white neighborhoods.

- 55.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 26.3% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 5.0% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 40.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 10.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 65.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 31.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 10.5% of REO properties in predominantly white neighborhoods had the same problem.
- 55.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 31.6% of REO properties in predominantly white neighborhoods had the same problem.
- 35.0% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 10.5% of the properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 21.1% of the properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 10.5% of the properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had a damaged roof, while only 15.8% of the REO properties in predominantly white neighborhoods had the same problem.

- 35.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 15.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 21.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had broken or discarded signage, while only 5.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had evidence of unauthorized occupancy, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 63.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.0% of the REO properties in neighborhoods of color had damaged siding, while only 10.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 35.0% of the REO properties in neighborhoods of color missing or out of place gutters, while only 31.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.0% of the REO properties in neighborhoods of obstructed gutters, while only 42.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 35.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 15.8% of the REO properties in predominantly white neighborhoods had the same problem.

10. DENVER, COLORADO

In the Denver, CO metropolitan area, Plaintiffs investigated 65 Bank of America REO properties. Of these 65 REO properties, 4 were located in African-American neighborhoods, 28 were located in predominantly Latino neighborhoods, 9 were located in predominantly non-white neighborhoods, and 24 were located in predominantly white neighborhoods.

- 29.2% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 2.4% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 97.6% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 70.8% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 43.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 8.3% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 4.9% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 70.7% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 45.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 34.1% of the REO properties in neighborhoods of color had accumulated mail, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 68.3% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 45.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 12.5% of REO properties in predominantly white neighborhoods had the same problem.

- 7.3% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 48.8% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 12.5% of the properties in predominantly white neighborhoods had the same problem.
- 7.3% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 4.2% of the properties in predominantly white neighborhoods had the same problem.
- 41.5% of the REO properties in neighborhoods of color had a damaged roof, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 12.2% of the REO properties in neighborhoods of color had a damaged roof, while only 4.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 58.5% of the REO properties in neighborhoods of color had a damaged fence, while only 41.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 19.5% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 7.3% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 9.8% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 53.7% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 20.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.7% of the REO properties in neighborhoods of color had damaged siding, while only 4.2% of the REO properties in predominantly white neighborhoods had the same problem.

- 29.3% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 20.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 19.5% of the REO properties in neighborhoods of color had obstructed gutters, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.8% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 19.5% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 4.2% of the REO properties in predominantly white neighborhoods had the same problem.

11. SUBURBAN DETROIT, MICHIGAN

In the Suburban Detroit, MI metropolitan area, Plaintiffs investigated 51 Bank of America REO properties. Of these 51 REO properties, 15 were located in African-American neighborhoods, 8 were located in predominantly non-white neighborhoods, and 28 were located in predominantly white neighborhoods.

- 39.3% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 60.7% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 43.5% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 7.1% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 87.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 39.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.4% of the REO properties in neighborhoods of color had accumulated mail, while only 17.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 69.6% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 42.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 56.5% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 32.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 21.7% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 8.7% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 43.5% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 21.4% of the properties in predominantly white neighborhoods had the same problem.
- 34.8% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 10.7% of the properties in predominantly white neighborhoods had the same problem.
- 56.5% of the REO properties in neighborhoods of color had a damaged roof, while only 21.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.4% of the REO properties in neighborhoods of color had a damaged roof, while only 7.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 43.5% of the REO properties in neighborhoods of color had a damaged fence, while only 17.9% of the REO properties in predominantly white neighborhoods had the same problem.

- 34.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.4% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 10.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 47.8% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 21.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 21.7% of the REO properties in neighborhoods of color had damaged siding, while only 17.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 52.2% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 39.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 21.7% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 7.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 26.1% of the REO properties in neighborhoods of color had obstructed gutters, while only 10.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 39.1% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 7.1% of the REO properties in predominantly white neighborhoods had the same problem.

12. FORT WORTH, TEXAS

In the Fort Worth, TX metropolitan area, Plaintiffs investigated 15 Bank of America REO properties. Of these 15 REO properties, 1 was located in an African-American neighborhood, 6 were located in predominantly Latino neighborhoods, 3 were located in predominantly non-white neighborhoods, and 5 were located in predominantly white neighborhoods.

- 80.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 90.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 20.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 30.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 40.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 70.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 20.0% of REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had a broken mailbox, while none of REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while none of the properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the properties in predominantly white neighborhoods had the same problem.

- 40.0% of the REO properties in neighborhoods of color had a damaged fence, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had wood rot, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 10.0% of the REO properties in neighborhoods of color missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

13. GARY, INDIANA

In the Gary, IN metropolitan area, Plaintiffs investigated 22 Bank of America REO properties. Of these 22 REO properties, 14 were located in African-American neighborhoods and 8 were located in predominantly white neighborhoods.

- 87.5% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 12.5% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 78.6% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 21.4% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 71.4% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 21.4% of the REO properties in neighborhoods of color had accumulated mail, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 78.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 37.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 35.7% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 12.5% of REO properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 12.5% of REO properties in predominantly white neighborhoods had the same problem.
- 7.1% of the REO properties in neighborhoods of color had a broken mailbox, while none of REO properties in predominantly white neighborhoods had the same problem.

- 14.3% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while none of the properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the properties in predominantly white neighborhoods had the same problem.
- 78.6% of the REO properties in neighborhoods of color had a damaged fence, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 7.1% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color a damaged fence, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 64.3% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 7.1% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color were marketed as distressed properties, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 71.4% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.

- 57.1% of the REO properties in neighborhoods of color had damaged siding, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 7.1% of the REO properties in neighborhoods of color broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color obstructed gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had a small amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 35.7% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

14. GRAND RAPIDS, MICHIGAN

In the Grand Rapids, MI metropolitan area, Plaintiffs investigated 134 Bank of America REO properties. Of these 134 REO properties, 26 were located in African-American neighborhoods, 19 were located in predominantly Latino neighborhoods, 18 were located in predominantly non-white neighborhoods, and 71 were located in predominantly white neighborhoods.

- 23.9% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 93.7% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 76.1% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 58.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 22.5% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

- 25.4% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while only 1.4% of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 87.3% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 45.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 47.6% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 39.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 26.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 6.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 1.4% of REO properties in predominantly white neighborhoods had the same problem.
- 30.2% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 16.9% of the properties in predominantly white neighborhoods had the same problem.
- 31.7% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 14.1% of the properties in predominantly white neighborhoods had the same problem.
- 54.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 32.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 46.0% of the REO properties in neighborhoods of color had a damaged roof, while only 15.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 60.3% of the REO properties in neighborhoods of color had a damaged fence, while only 38.0% of the REO properties in predominantly white neighborhoods had the same problem.

- 33.3% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 9.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 46.0% of the REO properties in neighborhoods of color had wood rot, while only 28.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.7% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 19.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 41.3% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while only 29.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.5% of the REO properties in neighborhoods of color had graffiti, while only 1.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 88.9% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 74.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 81.0% of the REO properties in neighborhoods of color had damaged siding, while only 49.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.6% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 14.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.2% of the REO properties in neighborhoods of color had water damage, while only 14.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 49.2% of the REO properties in neighborhoods of color had a small amount of mold, while only 40.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.6% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 9.9% of the REO properties in predominantly white neighborhoods had the same problem.

15. GREATER PALM BEACHES, FLORIDA

In the Greater Palm Beaches, FL metropolitan area, Plaintiffs investigated 25 Bank of America REO properties. Of these 25 REO properties, 2 were located in African-American neighborhoods, 3 were located in predominantly Latino neighborhoods, 8 were located in predominantly non-white neighborhoods, and 12 were located in predominantly white neighborhoods.

- 33.3% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 66.7% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 53.8% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 8.3% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 76.9% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 46.2% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 41.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 46.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 41.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 16.7% of REO properties in predominantly white neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.

- 76.9% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 50.0% of the properties in predominantly white neighborhoods had the same problem.
- 53.8% of the REO properties in neighborhoods of color had broken or boarded windows, while only 41.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 61.5% of the REO properties in neighborhoods of color had a damaged fence, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 23.1% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 46.2% of the REO properties in neighborhoods of color had wood rot, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 23.1% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 76.9% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 58.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.5% of the REO properties in neighborhoods of color had peeling or chipped paint, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 23.1% of the REO properties in neighborhoods of color had damaged siding, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had missing or damaged shutters, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 38.5% of the REO properties in neighborhoods of color had pervasive mold, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 76.9% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.

16. HARTFORD, CONNECTICUT

In the Hartford, CT metropolitan area, Plaintiffs investigated 15 Bank of America REO properties. Of these 15 REO properties, 2 were located in African-American neighborhoods, 2 were located in predominantly Latino neighborhoods, 4 were located in predominantly non-white neighborhoods, and 7 were located in predominantly white neighborhoods.

- 62.5% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 25.0% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 50.0% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in dead grass, while only 28.6% of REO properties in predominantly white neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had 10% to 50% of the property covered in invasive plants, while only 14.3% of REO properties in predominantly white neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.

- 50.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 28.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had a damaged fence, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 100.0% of the REO properties in neighborhoods of color had damaged siding, while only 42.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 28.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 62.5% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had obstructed gutters, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.

17. INDIANAPOLIS, INDIANA

In the Indianapolis, IN metropolitan area, Plaintiffs investigated 24 Bank of America REO properties. Of these 24 REO properties, 10 were located in African-American neighborhoods, 3 were located in predominantly non-white neighborhoods, and 11 were located in predominantly white neighborhoods.

- 36.4% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 63.6% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 53.8% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 7.7% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 46.2% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 53.8% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 36.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 69.2% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 7.7% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.

- 15.4% of the REO properties in neighborhoods of color had a broken mailbox, while only 9.1% of the properties in predominantly white neighborhoods had the same problem.
- 46.2% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 9.1% of the properties in predominantly white neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 53.8% of the REO properties in neighborhoods of color had broken or boarded windows, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 69.2% of the REO properties in neighborhoods of color had a damaged fence, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 53.8% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 61.5% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 54.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 53.8% of the REO properties in neighborhoods of color had damaged siding, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.5% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 46.2% of the REO properties in neighborhoods of color had obstructed gutters, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.8% of the REO properties in neighborhoods of color had a small amount of mold, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.4% of the REO properties in neighborhoods of color had pervasive mold, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.

18. KANSAS CITY, MISSOURI / KANSAS

In the Kansas City, MO/KS metropolitan area, Plaintiffs investigated 28 Bank of America REO properties. Of these 28 REO properties, 13 were located in African-American neighborhoods, 1 was located in a predominantly Latino neighborhood, 2 were located in predominantly non-white neighborhoods, and 12 were located in predominantly white neighborhoods.

- 58.3% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 93.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 41.7% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.

- 37.5% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 6.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 87.5% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had accumulated mail, while none of REO properties in predominantly white neighborhoods had the same problem.
- 62.5% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 41.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 16.7% of the properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 56.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.

- 31.3% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had a damaged fence, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 62.5% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had wood rot, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 43.8% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 6.3% of the REO properties in neighborhoods of color had obstructed gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had a small amount of mold, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 8.3% of the REO properties in predominantly white neighborhoods had the same problem.

19. LOUISVILLE, KENTUCKY

In the Louisville, KY metropolitan area, Plaintiffs investigated 31 Bank of America REO properties. Of these 31 REO properties, 11 were located in African-American neighborhoods and 20 were located in predominantly white neighborhoods.

- 30.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 70.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 27.3% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 10.0% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 90.9% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 40.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had accumulated mail, while only 15.0% of REO properties in predominantly white neighborhoods had the same problem.
- 81.8% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 30.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 63.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 55.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 25.0% of REO properties in predominantly white neighborhoods had the same problem.
- 18.2% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 5.0% of REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 20.0% of the properties in predominantly white neighborhoods had the same problem.

- 36.4% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 45.5% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 54.5% of the REO properties in neighborhoods of color had a damaged fence, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 15.0% of the REO properties in
- 36.4% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 30.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had obstructed gutters, while only 15.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had a small amount of mold, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 27.3% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 5.0% of the REO properties in predominantly white neighborhoods had the same problem.

20. MEMPHIS, TENNESSEE

In the Memphis, TN metropolitan area, Plaintiffs investigated 50 Bank of America REO properties. Of these 50 REO properties, 37 were located in African-American neighborhoods, 4 were located in predominantly non-white neighborhoods, and 9 were located in predominantly white neighborhoods.

- 66.7% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 33.3% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 51.2% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 11.1% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 7.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 53.7% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 63.4% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 22.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 61.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.1% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 11.1% of REO properties in predominantly white neighborhoods had the same problem.
- 14.6% of the REO properties in neighborhoods of color had a broken mailbox, while none of REO properties in predominantly white neighborhoods had the same problem.
- 51.2% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 33.3% of the properties in predominantly white neighborhoods had the same problem.
- 7.3% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 48.8% of the REO properties in neighborhoods of color had broken or boarded windows, while only 22.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 19.5% of the REO properties in neighborhoods of color had a damaged roof, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 29.3% of the REO properties in neighborhoods of color had a damaged fence, while only 22.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 65.9% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 22.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 41.5% of the REO properties in neighborhoods of color had wood rot, while only 22.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 78.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 55.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.1% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 46.3% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 39.0% of the REO properties in neighborhoods of color had damaged siding, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.8% of the REO properties in neighborhoods of color had missing or damaged shutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 17.1% of the REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 63.4% of the REO properties in neighborhoods of color had a small amount of mold, while only 11.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 12.2% of the REO properties in neighborhoods of color had pervasive mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 78.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

21. MIAMI / FORT LAUDERDALE, FLORIDA

In the Miami and Fort Lauderdale, FL metropolitan area, Plaintiffs investigated 43 Bank of America REO properties. Of these 43 REO properties, 15 were located in African-American neighborhoods, 7 were located in predominantly Latino neighborhoods, 8 were located in predominantly non-white neighborhoods, and 13 were located in predominantly white neighborhoods.

- 53.8% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.0% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 90.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 46.2% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 50.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 7.7% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 70.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 23.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 26.7% of the REO properties in neighborhoods of color had accumulated mail, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.

- 40.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 53.3% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 23.3% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 7.7% of REO properties in predominantly white neighborhoods had the same problem.
- 23.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 15.4% of REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had a broken mailbox, while only 7.7% of REO properties in predominantly white neighborhoods had the same problem.
- 43.3% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 30.8% of the properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 26.7% of the REO properties in neighborhoods of color had a damaged roof, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 26.7% of the REO properties in neighborhoods of color had a damaged fence, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 43.3% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 46.7% of the REO properties in neighborhoods of color had wood rot, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.

- 13.3% of the REO properties in neighborhoods of color were marketed as distressed properties, while only 7.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 23.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had damaged siding, while only 23.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a small amount of mold, while only 15.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 23.1% of the REO properties in predominantly white neighborhoods had the same problem.

22. MILWAUKEE, WISCONSIN

In the Milwaukee, WI metropolitan area, Plaintiffs investigated 134 Bank of America REO properties. Of these 134 REO properties, 74 were located in African-American neighborhoods, 21 were located in predominantly Latino neighborhoods, 8 were located in predominantly non-white neighborhoods, and 31 were located in predominantly white neighborhoods.

- 83.9% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 21.4% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 78.6% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 16.1% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 8.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 39.8% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 12.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.5% of the REO properties in neighborhoods of color had accumulated mail, while only 6.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.1% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 19.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 38.8% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 22.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.7% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 9.7% of the properties in predominantly white neighborhoods had the same problem.
- 15.5% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 9.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 61.2% of the REO properties in neighborhoods of color had broken or boarded windows, while only 9.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 23.3% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 17.5% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 3.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 11.7% of the REO properties in neighborhoods of color had wood rot, while only 3.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 87.4% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 61.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 12.6% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 3.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.4% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 6.5% of the REO properties in predominantly white neighborhoods had the same problem.

23. MINNEAPOLIS, MINNESOTA

In the Minneapolis, MN metropolitan area, Plaintiffs investigated 20 Bank of America REO properties. Of these 20 REO properties, 2 were located in African-American neighborhoods, 7 were located in predominantly non-white neighborhoods, and 11 were located in predominantly white neighborhoods.

- 54.5% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 88.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 45.5% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 44.4% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 18.2% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 55.6% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had accumulated mail, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 88.9% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 55.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 27.3% of the properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had broken or boarded windows, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had a damaged fence, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had wood rot, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 88.9% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 63.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 45.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had damaged siding, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 33.3% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.

24. MUSKEGON, MICHIGAN

In the Muskegon, MI metropolitan area, Plaintiffs investigated 28 Bank of America REO properties. Of these 28 REO properties, 4 were located in African-American neighborhoods, 5 were located in predominantly non-white neighborhoods, and 19 were located in predominantly white neighborhoods.

- 26.3% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 11.1% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 88.9% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 73.7% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 11.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 5.3% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 55.6% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 42.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 36.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 26.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 5.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 33.3% of the REO properties in neighborhoods of color had broken or boarded windows, while only 21.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had a damaged fence, while only 26.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 5.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had wood rot, while only 15.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 77.8% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 52.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had damaged siding, while only 42.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 5.3% of the REO properties in predominantly white neighborhoods had the same problem.

25. NEW HAVEN, CONNECTICUT

In the New Haven, CT metropolitan area, Plaintiffs investigated 16 Bank of America REO properties. Of these 16 REO properties, 6 were located in African-American neighborhoods, 1 was located in a predominantly Latino neighborhood, 3 were located in predominantly non-white neighborhoods, and 6 were located in predominantly white neighborhoods.

- 50.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO

properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 100% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 70.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 16.7% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 80.0% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 90.0% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 70.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 40.0% of the REO properties in neighborhoods of color had a damaged fence, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 30.0% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 80.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had damaged siding, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 60.0% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had pervasive mold, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

26. NEW ORLEANS, LOUISIANA

In the New Orleans, LA metropolitan area, Plaintiffs investigated 33 Bank of America REO properties. Of these 33 REO properties, 17 were located in African-American neighborhoods, 5 were located in predominantly non-white neighborhoods, and 11 were located in predominantly white neighborhoods.

- 18.2% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 81.8% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 59.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 13.6% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 77.3% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 27.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had accumulated mail, while only 36.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.9% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 45.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 54.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.1% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 9.1% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 13.6% of the REO properties in neighborhoods of color had a broken mailbox, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.1% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the properties in predominantly white neighborhoods had the same problem.
- 72.7% of the REO properties in neighborhoods of color had a damaged fence, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 45.5% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had wood rot, while only 18.2% of the REO properties in predominantly white neighborhoods had the same problem.
- 72.7% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 45.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.1% of the REO properties in neighborhoods of color had graffiti, while none of the properties in predominantly white neighborhoods had the same problem.
- 54.5% of the REO properties in neighborhoods of color had damaged siding, while only 45.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 13.6% of the REO properties in neighborhoods of color had broken or missing gutters, while only 9.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 45.5% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

27. NEWARK, NEW JERSEY

In the Newark, NJ metropolitan area, Plaintiffs investigated 34 Bank of America REO properties. Of these 34 REO properties, 25 were located in African-American neighborhoods, 3 were located in predominantly Latino neighborhoods, 3 were located in predominantly non-white neighborhoods, and 3 were located in predominantly white neighborhoods.

- 66.7% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 3.2% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 96.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 33.3% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 41.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 33.3% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 93.5% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 66.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.6% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 77.4% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 51.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.7% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 9.7% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 48.4% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 33.3% of the properties in predominantly white neighborhoods had the same problem.
- 67.7% of the REO properties in neighborhoods of color had broken or boarded windows, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.6% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 12.9% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 9.7% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 51.6% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 16.1% of the REO properties in neighborhoods of color had graffiti, while none of the properties in predominantly white neighborhoods had the same problem.
- 29.0% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 48.4% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 9.7% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 29.0% of the REO properties in neighborhoods of color had a small amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 9.7% of the REO properties in neighborhoods of color had a pervasive amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 16.1% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

28. ORLANDO, FLORIDA

In the Orlando, FL metropolitan area, Plaintiffs investigated 38 Bank of America REO properties. Of these 38 REO properties, 17 were located in African-American neighborhoods, 4 were located in predominantly Latino neighborhoods, 1 was located in a predominantly non-white neighborhood, and 16 were located in predominantly white neighborhoods.

- 18.8% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 81.2% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 81.8% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 37.5% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 22.7% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while only 18.8% of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 77.3% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 31.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 45.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 25.0% of REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 18.8% of REO properties in predominantly white neighborhoods had the same problem.
- 40.9% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 12.5% of REO properties in predominantly white neighborhoods had the same problem.
- 13.6% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 36.4% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 25.0% of the properties in predominantly white neighborhoods had the same problem.
- 72.7% of the REO properties in neighborhoods of color had a damaged roof, while only 31.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 81.8% of the REO properties in neighborhoods of color had a damaged fence, while only 43.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 68.2% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 37.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 77.3% of the REO properties in neighborhoods of color had wood rot, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 68.2% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 43.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.7% of the REO properties in neighborhoods of color had graffiti, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.

- 68.2% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 40.9% of the REO properties in neighborhoods of color had damaged siding, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 54.5% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 31.3% of the REO properties in predominantly white neighborhoods had the same problem.

29. PHILADELPHIA, PENNSYLVANIA

In the Philadelphia, PA metropolitan area, Plaintiffs investigated 65 Bank of America REO properties. Of these 65 REO properties, 35 were located in African-American neighborhoods, 5 were located in predominantly Latino neighborhoods, 9 were located in predominantly non-white neighborhoods, and 16 were located in predominantly white neighborhoods.

- 56.3% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.2% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 89.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 43.8% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 22.4% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 12.5% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 57.1% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 37.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 46.9% of the REO properties in neighborhoods of color had accumulated mail, while only 18.8% of the REO properties in predominantly white neighborhoods had the same problem.

- 38.8% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 31.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 10.2% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.
- 18.4% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 26.5% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 6.3% of the properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had broken or boarded windows, while only 31.3% of the properties in predominantly white neighborhoods had the same problem.
- 22.4% of the REO properties in neighborhoods of color had a damaged fence, while only 18.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 32.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 6.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 26.5% of the REO properties in neighborhoods of color had wood rot, while only 6.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.3% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 73.5% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 31.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 37.5% of the REO properties in predominantly white neighborhoods had the same problem.

- 36.7% of the REO properties in neighborhoods of color had damaged siding, while only 18.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 12.2% of the REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 10.2% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.

30. PROVIDENCE, RHODE ISLAND

In the Providence, RI metropolitan area, Plaintiffs investigated 12 Bank of America REO properties. Of these 12 REO properties, 5 were located in predominantly Latino neighborhoods, 3 were located in predominantly non-white neighborhoods, and 4 were located in predominantly white neighborhoods.

- 50.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while none of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 100.0% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 75.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 25.0% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 87.5% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had accumulated mail, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 62.5% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 87.5% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 25.0% of REO properties in predominantly white neighborhoods had the same problem.
- 87.5% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.0% of the properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 25.0% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 87.5% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 75.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

31. RICHMOND, OAKLAND, AND CONCORD CALIFORNIA

In the Richmond, Oakland, and Concord, CA metropolitan area, Plaintiffs investigated 61 Bank of America REO properties. Of these 61 REO properties, 9 were located in predominantly African-American neighborhoods, 23 were located in predominantly Latino neighborhoods, 13 were located in predominantly non-white neighborhoods, and 16 were located in predominantly white neighborhoods.

- 50.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.7% of the

REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.

- 82.2% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 43.8% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 46.7% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 12.5% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 11.1% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 77.8% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 43.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 12.5% of REO properties in predominantly white neighborhoods had the same problem.
- 42.2% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 6.3% of the properties in predominantly white neighborhoods had the same problem.
- 48.9% of the REO properties in neighborhoods of color had broken or boarded windows, while only 6.3% of the properties in predominantly white neighborhoods had the same problem.
- 6.7% of the REO properties in neighborhoods of color had a damaged roof, while none of REO properties in predominantly white neighborhoods had the same problem.
- 42.2% of the REO properties in neighborhoods of color had a damaged fence, while only 18.8% of the REO properties in predominantly white neighborhoods had the same problem.

- 20.0% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.2% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 15.6% of the REO properties in neighborhoods of color were marketed as distressed properties, while only 6.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 73.3% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 43.8% of the REO properties in predominantly white neighborhoods had the same problem.
- 13.3% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 71.1% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had damaged siding, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 35.6% of the REO properties in neighborhoods of color had water damage, while only 12.5% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.8% of the REO properties in neighborhoods of color had a small amount of mold, while only 6.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

32. SAN ANTONIO, TEXAS

In the San Antonio, TX metropolitan area, Plaintiffs investigated 23 Bank of America REO properties. Of these 23 REO properties, 18 were located in predominantly Latino neighborhoods, 1 was located in a predominantly non-white neighborhood, and 4 were located in predominantly white neighborhoods.

- 50.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 10.5% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 89.5% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 36.8% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 10.5% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 78.9% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 73.7% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 73.7% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.1% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.

- 31.6% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 26.3% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 15.8% of the REO properties in neighborhoods of color had a broken mailbox, while none of REO properties in predominantly white neighborhoods had the same problem.
- 36.8% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 25.0% of the properties in predominantly white neighborhoods had the same problem.
- 31.6% of the REO properties in neighborhoods of color had broken or boarded windows, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 10.5% of the REO properties in neighborhoods of color had a damaged roof, while none of REO properties in predominantly white neighborhoods had the same problem.
- 89.5% of the REO properties in neighborhoods of color had a damaged fence, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 10.5% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 15.8% of the REO properties in neighborhoods of color had graffiti, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 36.8% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 15.8% of the REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 10.5% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

33. TAMPA, FLORIDA

In the Tampa, FL metropolitan area, Plaintiffs investigated 42 Bank of America REO properties. Of these 42 REO properties, 12 were located in African-American neighborhoods, 5 were located in predominantly Latino neighborhoods, 18 were located in predominantly non-white neighborhoods, and 7 were located in predominantly white neighborhoods.

- 28.6% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.7% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 94.3% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 71.4% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 60.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 28.6% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 8.6% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 57.1% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 42.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 74.3% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 57.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.1% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 14.3% of REO properties in predominantly white neighborhoods had the same problem.

- 11.4% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 51.4% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 42.9% of the properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the properties in predominantly white neighborhoods had the same problem.
- 45.7% of the REO properties in neighborhoods of color had a damaged roof, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.1% of the REO properties in neighborhoods of color had a damaged roof, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 45.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.4% of the REO properties in neighborhoods of color had wood rot, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 17.1% of the REO properties in neighborhoods of color had trespassing or warning signs, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 85.7% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 71.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 25.7% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 8.6% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had a small amount of mold, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 20.0% of the REO properties in neighborhoods of color had a pervasive amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 40.0% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 28.6% of the REO properties in predominantly white neighborhoods had the same problem.

34. TOLEDO, OHIO

In the Toledo, OH metropolitan area, Plaintiffs investigated 44 Bank of America REO properties. Of these 44 REO properties, 14 were located in African-American neighborhoods, 2 were located in predominantly non-white neighborhoods, and 28 were located in predominantly white neighborhoods.

- 28.6% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 6.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 93.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 71.4% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 50.0% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 7.1% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.
- 6.3% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 68.8% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 17.9% of the REO properties in predominantly white neighborhoods had the same problem.
- 68.8% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 46.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 75.0% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 46.4% of the REO properties in predominantly white neighborhoods had the same problem.
- 56.3% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 21.4% of REO properties in predominantly white neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while only 3.6% of REO properties in predominantly white neighborhoods had the same problem.
- 12.5% of the REO properties in neighborhoods of color had a broken mailbox, while only 3.6% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 10.7% of the properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 17.9% of the properties in predominantly white neighborhoods had the same problem.
- 50.0% of the REO properties in neighborhoods of color had a damaged roof, while only 39.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had a damaged roof, while only 7.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had holes in the structure of the home, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.

- 43.8% of the REO properties in neighborhoods of color had damaged siding, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 37.5% of the REO properties in neighborhoods of color had missing or out of place gutters, while only 10.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had broken or hanging gutters, while only 7.1% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had obstructed gutters, while only 25.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 31.3% of the REO properties in neighborhoods of color had a small amount of mold, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 18.8% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while only 14.3% of the REO properties in predominantly white neighborhoods had the same problem.

35. VALLEJO, CALIFORNIA

In the Vallejo, CA metropolitan area, Plaintiffs investigated 24 Bank of America REO properties. Of these 24 REO properties, 2 were located in Latino neighborhoods, 16 were located in predominantly non-white neighborhoods, and 6 were located in predominantly white neighborhoods.

- 50.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 38.9% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 61.1% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 50.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 11.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

- 5.6% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 44.4% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 33.3% of the REO properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had accumulated mail, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 55.6% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.
- 44.4% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while only 33.3% of REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while none of the properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had damaged steps or handrails, while none of the properties in predominantly white neighborhoods had the same problem.
- 22.2% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 27.8% of the REO properties in neighborhoods of color had a damaged fence, while only 16.7% of the REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 16.7% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 61.1% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 33.3% of the REO properties in neighborhoods of color had peeling or chipped paint, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 11.1% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly white neighborhoods had the same problem.

36. WASHINGTON, DC AND PRINCE GEORGE’S COUNTY, MD

In the Washington, DC and Prince George’s County, MD metropolitan area, Plaintiffs investigated 63 Bank of America REO properties. Of these 63 REO properties, 58 were located in African-American neighborhoods and 5 were located in predominantly white neighborhoods.

- 80.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 5.2% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 94.8% of REO properties in neighborhoods of color had 5 or more marketing or maintenance deficiencies, while only 20.0% of the REO properties in white neighborhoods had 5 or more marketing or maintenance deficiencies.
- 62.1% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

- 13.8% of REO properties in neighborhoods of color had 15 or more marketing or maintenance deficiencies, while none of the REO properties in white neighborhoods had 15 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 70.7% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 24.1% of the REO properties in neighborhoods of color had accumulated mail, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 63.8% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 62.1% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 25.9% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in dead grass, while only 20.0% of REO properties in predominantly white neighborhoods had the same problem.
- 8.3% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.
- 41.4% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 20.0% of REO properties in predominantly white neighborhoods had the same problem.
- 19.0% of the REO properties in neighborhoods of color had 50% or more of the property covered in invasive plants, while none of REO properties in predominantly white neighborhoods had the same problem.
- 17.2% of the REO properties in neighborhoods of color had a broken mailbox, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 32.8% of the REO properties in neighborhoods of color had unsecured, boarded, or broken doors, while only 20.0% of the properties in predominantly white neighborhoods had the same problem.
- 41.4% of the REO properties in neighborhoods of color had broken or boarded windows, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 20.7% of the REO properties in neighborhoods of color had a damaged roof, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 48.3% of the REO properties in neighborhoods of color had a damaged fence, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 22.4% of the REO properties in neighborhoods of color had holes in the structure of the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 24.1% of the REO properties in neighborhoods of color had wood rot, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 20.7% of the REO properties in neighborhoods of color had signs marketing the home as a distressed property, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 22.4% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 10.3% of the REO properties in neighborhoods of color had broken or discarded signage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 65.5% of the REO properties in neighborhoods of color had peeling or chipped paint, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 37.9% of the REO properties in neighborhoods of color had damaged siding, while none of the REO properties in predominantly white neighborhoods had the same problem.

- 34.5% of the REO properties in neighborhoods of color had missing or out of place gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 27.6% of the REO properties in neighborhoods of color had broken or hanging gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 22.4% of the REO properties in neighborhoods of color had obstructed gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 27.6% of the REO properties in neighborhoods of color had water damage, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 36.2% of the REO properties in neighborhoods of color had a small amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 15.5% of the REO properties in neighborhoods of color had a pervasive amount of mold, while none of the REO properties in predominantly white neighborhoods had the same problem.
- 37.9% of the REO properties in neighborhoods of color had exposed or tampered-with utilities, while none of the REO properties in predominantly white neighborhoods had the same problem.

37. WATERBURY, CONNECTICUT

In the Waterbury, CT metropolitan area, Plaintiffs investigated 17 Bank of America REO properties. Of these 17 REO properties, 1 was located in a predominantly Latino neighborhood, 6 were located in predominantly non-white neighborhoods, and 10 were located in predominantly white neighborhoods.

- 20.0% of the REO properties in predominantly white neighborhoods had fewer than 5 maintenance or marketing deficiencies, while only 14.3% of the REO properties in neighborhoods of color had fewer than 5 maintenance or marketing deficiencies.
- 42.9% of REO properties in neighborhoods of color had 10 or more marketing or maintenance deficiencies, while only 10.0% of the REO properties in white neighborhoods had 10 or more marketing or maintenance deficiencies.

REO properties in neighborhoods of color were far more likely to have certain types of deficiencies or problems than REO properties in predominantly white

neighborhoods. Plaintiffs found significant racial disparities in the majority of the objective factors they measured, including the following:

- 57.1% of the REO properties in neighborhoods of color had substantial amounts of trash or debris on the premises, while only 50.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had accumulated mail, while only 20.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 71.4% of the REO properties in neighborhoods of color had overgrown grass or dead leaves, while only 60.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had overgrown or dead shrubbery, while only 10% of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had 50% or more of the property covered in dead grass, while none of REO properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had at least 10% to 50% of the property covered in invasive plants, while only 30.0% of REO properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had damaged steps or handrails, while only 30.0% of the properties in predominantly white neighborhoods had the same problem.
- 57.1% of the REO properties in neighborhoods of color had broken or boarded windows, while only 40.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had a damaged roof, while only 10.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had wood rot, while only 10.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 28.6% of the REO properties in neighborhoods of color had trespassing or warning signs, while only 10.0% of the REO properties in predominantly white neighborhoods had the same problem.

- 100.0% of the REO properties in neighborhoods of color had no professional “for sale” sign marketing the home, while only 80.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 42.9% of the REO properties in neighborhoods of color had damaged siding, while only 30.0% of the REO properties in predominantly white neighborhoods had the same problem.
- 14.3% of the REO properties in neighborhoods of color had obstructed gutters, while none of the REO properties in predominantly white neighborhoods had the same problem.