

Foreclosure-Related Consent Orders Status Report: Observations, Payments, and Foreclosure Prevention Assistance

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Contents

Executive Summary	3
Payment Summary	3
Loss Mitigation and Foreclosure Prevention Activity Summary	4
Observations from the Independent Foreclosure Reviews Summary	5
Part 1: Payment Status	7
Part 2: Other Loss Mitigation and Foreclosure Prevention Assistance	8
Payments to the Qualified Settlement Funds and to HUD-Approved Counselors	8
<i>Table 1: Payments Made to Meet Foreclosure Prevention Assistance Obligation</i>	8
Reported Additional Loss Mitigation and Foreclosure Prevention Assistance	8
<i>Table 2: Foreclosure Prevention Assistance Activity Submitted by Covered Servicers</i>	9
Part 3: Observations from the Independent Foreclosure Reviews	10
<i>Table 3. Most Common Errors With Financial Harm Found by Independent Consultants</i>	10
<i>Table 4. Completion and Error Rates at 10 OCC-Regulated Servicers Entering IFR Payment Agreement in January 2013</i>	11
Observations from the Review of EverBank Mortgage Servicing and Foreclosure Processes	12
<i>Table 5. EverBank Consultant Findings and Approved Remediation</i>	12
Observations from the Review of OneWest Mortgage Servicing and Foreclosure Processes	14
<i>Table 6. OneWest Consultant Findings and Approved Remediation, as of February 27, 2014</i>	14
Appendix 1: Independent Foreclosure Review Agreement Amounts	16
<i>Table 7: Independent Foreclosure Review Agreement Amounts</i>	16
Appendix 2: State-Level Payment Data for Qualified Settlement Fund 1	17
<i>Table 8: State-Level Payment Data as of January 24, 2014</i>	17
Appendix 3: Aggregate Findings of Consultants as of December 31, 2012	19
<i>Table 9. Aggregate Findings of Consultants as of December 31, 2012</i>	19
Appendix 4: Payments by Category	20
<i>Table 10. Payments in Qualified Settlement Fund 1 by Payment Category</i>	20
Appendix 5: Servicer Foreclosure Prevention Activity Reported by State	24

Executive Summary

In 2013, the Office of the Comptroller of the Currency (OCC) and the Federal Reserve Board (FRB) amended consent orders against 15 mortgage servicers for deficient practices in mortgage servicing and foreclosure processing. In total, these Independent Foreclosure Review (IFR) Payment Agreements require the servicers to provide \$3.9 billion in payments to 4.4 million eligible borrowers and \$6.1 billion in other loss mitigation and foreclosure prevention assistance.¹

Servicers covered by these amendments to the consent orders include: Aurora Bank FSB,² Bank of America, N.A., Citibank, N.A., EverBank, GMAC Mortgage, Goldman Sachs, HSBC Bank USA, N.A., JPMorgan Chase Bank, N.A., MetLife Bank,³ N.A., Morgan Stanley, PNC Bank, N.A., Sovereign Bank,⁴ SunTrust Bank,⁵ U.S. Bank, N.A., and Wells Fargo Bank, N.A. The amendments effectively ended requirements for these servicers to have an independent review of the files of their borrowers who were in the process of foreclosure at any time in 2009 and 2010. The independent review had been required by consent orders issued in 2011.⁶

In addition to these 15 servicers, OneWest Bank, FSB,⁷ which includes Financial Freedom and IndyMac Mortgage Services, has operated under a consent order since April 2011 that also required an independent review of its foreclosure activity in 2009 and 2010. That review is nearing completion. Where the independent consultant found errors that resulted in financial harm in reviews that have been completed, borrowers began to receive remediation in March 2014. Notifications to borrowers regarding the results of the OneWest Bank reviews will continue through the summer of 2014. This report provides data on the volume and categories of OneWest remediation determined thus far. OneWest is not subject to an amended consent order.

Payment Summary

Because servicers entered agreements at different times, regulators directed the creation of four separate settlement funds. This report focuses on Qualified Settlement Fund 1, which includes payments from Aurora, Bank of America, Citibank, HSBC, JPMorgan Chase, MetLife Bank, PNC, Sovereign, SunTrust, U.S. Bank, and Wells Fargo. As of January 24, 2014, Qualified Settlement Fund 1 had disbursed 3,948,415 checks, totaling \$3,385,814,432. Of those checks,

¹ See <http://www.occ.gov/news-issuances/news-releases/2013/nr-ia-2013-35.html>, <http://www.occ.gov/news-issuances/news-releases/2011/nr-occ-2011-47.html>, <http://www.federalreserve.gov/newsevents/press/enforcement/20130726a.htm>, and <http://www.occ.treas.gov/news-issuances/news-releases/2013/nr-occ-2013-126.html>.

² Aurora Bank FSB is no longer a federal thrift.

³ MetLife Bank, N.A., is no longer a national bank.

⁴ Sovereign was purchased by Banco Santander SA in 2009 and changed its name to Santander Bank, N.A., in 2013.

⁵ The FRB is the primary regulator of SunTrust. The OCC is the primary regulator of other servicers included in Qualified Settlement Fund 1.

⁶ See <http://www.occ.gov/news-issuances/news-releases/2011/nr-occ-2011-47.html>.

⁷ OneWest, FSB, converted to a national bank in 2014.

3,280,458 (83 percent), totaling \$2,903,932,623 (86 percent), have been cashed or deposited as of April 8, 2014. Reissued checks will affect the value of checks cashed, but do not count toward the total number and value issued.

Payments also have been made to eligible borrowers whose mortgages were serviced by Goldman Sachs and Morgan Stanley (Qualified Settlement Fund 2), as well as eligible borrowers whose mortgages were serviced by GMAC Mortgage (Qualified Settlement Fund 3).⁸ Payments to eligible borrowers serviced by EverBank are expected to begin in the second quarter of 2014 (Qualified Settlement Fund 4).⁹

Eligible borrowers whose mortgages were serviced by Aurora, Bank of America, Citibank, Goldman Sachs, GMAC Mortgage, HSBC, JPMorgan Chase, MetLife Bank, Morgan Stanley, PNC, Sovereign, SunTrust, U.S. Bank, and Wells Fargo, and who have questions regarding payments should contact Rust Consulting, Inc., at 1-888-952-9105, Monday through Friday, 8 a.m. – 10 p.m. ET or Saturday, 8 a.m. – 5 p.m. ET.

Eligible borrowers whose mortgages were serviced by EverBank with questions regarding payments can contact Epiq Systems at 1-877-819-9754, send an e-mail to: info@EverBankIndependentForeclosureReview.com, or send a letter to: EverBank IFR Payment Agreement, PO Box 2730, Portland, OR 97208-2730.

Eligible borrowers with questions about remediation from Financial Freedom (OneWest) and IndyMac Mortgage Services may call 1-800-500-6097, Monday through Friday, 8 a.m. – 8 p.m. CT.

Loss Mitigation and Foreclosure Prevention Activity Summary

In addition to direct payments to eligible borrowers, the amended consent orders obligated covered servicers to provide \$6,061,000,000 in other foreclosure prevention assistance. Aurora, EverBank, GMAC Mortgage, MetLife Bank, Morgan Stanley, and PNC Bank met their obligations by paying collectively an additional \$92 million to the qualified settlement funds or to U.S. Department of Housing and Urban Development (HUD)-approved nonprofit organizations providing borrower counseling or education services. Of this amount, \$63 million went to the qualified settlement funds and \$29 million went to HUD-approved borrower counseling and education.

Bank of America, Citibank, HSBC, JPMorgan Chase, Sovereign, U.S. Bank, and Wells Fargo submitted foreclosure prevention assistance activities for credit under the amended consent orders on 16,362 mortgages with a total unpaid balance of \$4,045,726,584 through January 24, 2014. The average mortgage that received assistance from these servicers had an unpaid balance of \$247,264. The average deficiency waived was \$104,909 and the average reduction in monthly principal and interest payment was \$614. Data presented here reflect the servicers' submissions, but regulators have not validated submissions nor have they awarded credit toward

⁸ The FRB is the primary regulator for Goldman Sachs, Morgan Stanley, and GMAC Mortgage.

⁹ The OCC is the primary regulator of EverBank.

the obligations under the amended consent orders. Part 2 of this report discusses those submissions in greater detail. Validation of the submissions is underway.

The amended consent orders included principles servicers should consider when evaluating the effectiveness of loss mitigation and foreclosure prevention programs. As the activities submitted for credit under the amended consent orders represent a small portion of the total activities undertaken by a servicer, the actions cannot be viewed in isolation to evaluate the overall effectiveness of a servicer's loss mitigation and foreclosure prevention programs. The OCC will be reviewing the loss mitigation and foreclosure prevention activities undertaken by servicers since the consent orders were executed in 2011 to assess the effectiveness of those programs. Regulators encourage borrowers needing foreclosure prevention assistance to work directly with their servicer or contact the Homeowner's HOPE Hotline at 888-995-HOPE (4673) to be put in touch with a HUD-approved nonprofit organization that can provide free assistance.

Observations from the Independent Foreclosure Reviews Summary

In general, independent consultant findings regarding the reviews that were complete or had a significant portion of the work finished at the termination of the IFR were consistent with the deficiencies and weaknesses examiners identified during the 2010 horizontal review of large and midsized mortgage servicers. Besides those deficiencies and weaknesses, the findings identified additional loss mitigation related errors.¹⁰

Errors and process weaknesses identified most often by the consultants during the IFR included:

- Improper loan modification denials and untimely execution, aggravated by rapidly increasing modification request volume without adequate staffing and changing program guidelines during 2009 and 2010;
- Untimely communication and inadequate recognition of bankruptcy protection by servicing departments;
- Violations of Servicemembers Civil Relief Act (SCRA) protections; and
- Fee errors arising from servicer process weaknesses, especially servicers' lack of oversight of external parties who provided services such as legal representation and property management.

When the IFR payment agreement was negotiated between the participating servicers and the regulators at the end of 2012, 14 percent, or 103,820, of the files identified for review were complete, 8.9 percent of the completed file reviews had some type of servicer error, and 4.5 percent of the mortgages qualified for financial remediation under the 2012 financial remediation framework. Where ICs identified errors resulting in financial harm, the rate of error varied by servicer from a high of 23.9 percent at one servicer and a low of 0.6 percent at another. Of the errors with financial harm, many were relatively small fee errors.

¹⁰ See <http://www.occ.gov/news-issuances/news-releases/2011/nr-occ-2011-47a.pdf> for a discussion of those findings.

The consultant for EverBank completed a substantial number of its reviews, including all files in the sample population and all requests-for-reviews, before EverBank entered into a similar IFR payment agreement with its regulator in August 2013. In total, the EverBank consultant found compensable errors in 22 percent of servicer's in-scope population of mortgages, and 97 percent of those errors involved relatively small fee errors.

The consultant for OneWest is nearing completion of the IFR process. By the end of February 2014, a substantial number of files were completed, and OneWest began remediation on March 3, 2014. At that time, the consultant had confirmed a total of 10,781 borrowers (5.6 percent of the in-scope population of 192,199) were due remediation in the aggregate amount of \$8,520,105. As the independent consultant completes the remaining independent reviews, OneWest will continue to deliver remediation checks through the third quarter of 2014.

All servicers covered by the consent orders continue to take action to correct deficiencies in mortgage servicing and foreclosure processes as directed by the OCC and FRB enforcement actions. While servicers report that much of that work is complete, federal examiners are in the process of verifying and testing that work. This report does not discuss the status of corrective actions required by the original consent orders.

Part 1: Payment Status

The amended consent orders issued by the OCC and FRB in 2013 require 15 mortgage servicers to pay \$3.9 billion to approximately 4.4 million eligible borrowers. Payments began on April 12, 2013 and were sent in waves. Because servicers entered agreements at different times, regulators directed the creation of four different payment funds. The largest of these, Qualified Settlement Fund 1, includes 10 OCC-supervised servicers (Aurora, Bank of America, Citibank, HSBC, JPMorgan Chase, MetLife Bank, PNC, Sovereign, U.S. Bank, and Wells Fargo) and one FRB-supervised servicer (SunTrust).

This report provides data on payments made by Qualified Settlement Fund 1 through January 24, 2014. As of that date, Qualified Settlement Fund 1 issued 3,948,415 checks for a total of \$3,385,814,432. Of those checks, 3,280,458 (83 percent), totaling \$2,903,932,623 (86 percent) have been cashed or deposited as of April 8, 2014.

Of the total number of initial checks in Qualified Settlement Fund issued through January 24, 2014, 500,335 (11.7 percent) were initially returned as undeliverable. The paying agent performed additional research to identify alternative addresses for all borrowers on the loans so that the returned checks could be reissued. The paying agent conducted similar address searches for eligible borrowers who did not cash their checks before the check expired and sent checks to updated addresses where available. Almost all returned and expired checks were reissued at least once. The remaining checks are being reissued as case-specific issues (e.g., splitting payments, change of payee, etc.) are resolved. Reissued checks will affect the value of checks cashed, but do not count toward the total number and value issued.

Payments will begin in the second quarter of 2014 for Qualified Settlement Fund 4, which includes OCC-supervised EverBank.

Appendix 1 presents the number of eligible borrowers, payment amounts and other foreclosure prevention assistance by each servicer covered by the IFR payment agreements. Appendix 2 presents state-level data on the volume and amount of payments made under Qualified Settlement 1. Appendix 4 presents the number and value of checks issued and paid by Qualified Settlement Fund 1 by payment category.

Part 2: Other Loss Mitigation and Foreclosure Prevention Assistance

The amended consent orders issued in 2013 also direct participating servicers to provide \$6.1 billion in other loss mitigation and foreclosure prevention assistance. Activities that can receive credit toward that amount include loan modifications, short sales, and other forms of assistance subject to regulatory non-objection. The amended consent orders stipulate the amount of credit a servicer can receive for each type of activity.¹¹

In providing foreclosure prevention assistance, regulators expect the servicers to undertake well-structured loss mitigation efforts focused on foreclosure prevention, with preference given to activities designed to keep eligible borrowers in their homes through affordable, sustainable, and meaningful home preservation actions.

Payments to the Qualified Settlement Funds and to HUD-Approved Counselors

Six servicers—Aurora, EverBank, GMAC Mortgage, MetLife Bank, Morgan Stanley, and PNC—met their obligations to provide additional foreclosure assistance by paying collectively \$92,000,000 to the qualified settlement funds or HUD-approved nonprofit organizations providing borrower counseling and/or education services.

Payments to the Qualified Settlement Funds	\$63,000,000
Cash to Borrower Counseling or Education	\$29,000,000
Total¹	\$92,000,000

1. Amounts rounded to nearest million.

Servicers that fully satisfied their obligation to provide additional foreclosure prevention assistance by paying into the qualified settlement funds or providing cash to borrower counseling and education will not report additional loss mitigation and foreclosure prevention activities.

Reported Additional Loss Mitigation and Foreclosure Prevention Assistance

The remaining servicers covered by the amended consent orders (Bank of America, Citibank, HSBC, JPMorgan Chase, Sovereign, U.S. Bank, and Wells Fargo) are fulfilling their loss mitigation and foreclosure prevention assistance obligations by providing assistance allowable under the amended consent orders directly to eligible borrowers.

Servicers may meet their commitments through three specific consumer relief activities set forth in the National Mortgage Settlement (NMS):¹² first lien modifications, second lien modifications, and short sales/deeds in lieu of foreclosure. The amendments to the consent

¹¹ See article IV of the amended consent orders. For example, see <http://www.occ.gov/static/enforcement-actions/ea2013-127.pdf>.

¹² In February 2012, 49 state attorneys general, the federal government, and five of the largest mortgage servicers entered into the NMS. See <http://www.nationalmortgagesettlement.com>.

orders describe how these activities will be credited.¹³ Servicers may also meet their commitments by providing other foreclosure prevention actions, subject to regulatory non-objection. The amount of foreclosure prevention assistance each servicer is obligated to provide is included in appendix 1. Appendix 5 presents activity submitted for regulator consideration by each covered servicer.

Table 2 presents the gross value of activities reported by covered servicers. Regulators are validating submissions and have not determined the amount of activity that servicers will receive credit for toward their obligations. Table 2 excludes other activities that servicers have submitted for regulatory non-objection, but have not yet received a determination.

	Total
# of Loans	16,362
Unpaid Balance (UPB) Before Action	\$4,045,726,584
Average UPB Before Action	\$247,264
Average Sales Price (Short Sales)	\$147,798
Deficiency Waived	\$147,186,774
Average Deficiency Waived	\$104,909
Transition Assistance Provided	\$1,437,339
Average Interest Rate Before Action ¹	5.97%
Average Interest Rate After Action	4.01%
Average Debt-to-Income (DTI) Before Action	42%
Average DTI After Action	27%
Average Payment Reduction (If Applicable) ²	\$614

1. Calculations performed on interest rates and DTI include only those records with before and after values.

2. Average payment reduction reflects the straight average of all the differences between principal and interest on loans with both a before and after amount.

Bank of America, Citibank, JPMorgan Chase, and Wells Fargo are also part of the NMS. The NMS monitor issued a report on March 18, 2014, announcing that these servicers had fulfilled their consumer relief obligations under the NMS. Servicers covered by the NMS and the IFR Payment Agreement must meet obligations of both settlements. Servicers cannot use actions taken to fulfill NMS obligations to fulfill the servicers' obligations under the amended consent orders.

The regulators recognize that the assistance reported here represents a portion of the total consumer assistance and loss mitigation activity by each servicer. Regulators will continue to monitor each servicer's compliance with the original consent orders to ensure effective loss mitigation and foreclosure prevention activities.

¹³ See amendments to the consent orders included at the bottom of <http://www.occ.gov/independentforeclosurereview> and <http://www.federalreserve.gov/newsevents/press/enforcement/20130228a.htm>.

Part 3: Observations from the Independent Foreclosure Reviews

While the IFR was terminated before reaching its conclusion for 15 of 16 servicers required to retain an independent consultant to conduct a review of their foreclosure activity in 2009 and 2010, the reviews that were complete provide insight into the type and quantity of weaknesses and errors in foreclosure and loss mitigation processes that were present at those servicers, supervised by the OCC.

In general, independent consultant findings regarding the reviews that were complete or had a significant portion of the work finished were consistent with the deficiencies and weaknesses examiners identified during the 2010 horizontal review of large and midsized mortgage servicers and identified additional loss mitigation related errors. The findings of that horizontal review were published in April 2011.¹⁴

Errors and process weaknesses identified most often by the consultants during the IFR included:

- Loan modification denials and untimely execution, aggravated by rapidly increasing modification request volume without adequate staffing and changing program guidelines during 2009 and 2010;
- Untimely communication and recognition of bankruptcy protection by servicing departments;
- Violations of SCRA protections; and
- Fee errors arising from servicer process weaknesses, especially servicers' lack of oversight of external parties who provided services such as legal representation and property management.

Error rates identified by consultants varied greatly, but were primarily low dollar, fee-related errors. Of the errors that were found to result in financial injury, the most common were general errors,¹⁵ followed by errors in denying modifications, bankruptcy-related errors, notice errors, and SCRA-related errors (see table 3).

Category	Percent of total financial harm errors found
General error	51.2
Modification denied in error	9.1
Bankruptcy	9.1
Servicer failed to provide legally sufficient notice	8.4
SCRA-related errors	8.2

When the IFR payment agreement was negotiated between the participating servicers and the regulators at the end of 2012, 14 percent, or 103,820, of the files identified for review were complete, 8.9 percent of the completed file reviews had some type of error, and 4.5 percent of the mortgages qualified for financial remediation under the 2012 financial remediation

¹⁴ See <http://www.occ.gov/news-issuances/news-releases/2011/nr-occ-2011-47a.pdf>.

¹⁵ Miscellaneous errors related to fees or other administrative action.

framework.¹⁶ Many errors were technical in nature, did not have a monetary impact for borrowers, and very few of these invalidated foreclosure actions. Where ICs identified errors resulting in financial harm, the rate of error varied from a high of 23.9 percent at one servicer and a low of 0.6 percent at another.¹⁷ Of the errors with financial harm, many were small dollar fee errors. The types of findings were generally consistent across all servicers, including those that entered amended consent orders terminating the IFR in January 2013 and those that did not.

On December 31, 2012, regulators required servicers to provide data on the categorization of errors found as of that date. See appendix 3.

In January 2013, 10 OCC-regulated servicers entered the IFR Payment Agreement, which terminated their IFR processes. Table 4 presents data on the status of reviews completed for those servicers at the time their reviews were terminated.¹⁸

Table 4. Completion and Error Rates at 10 OCC-Regulated Servicers Entering IFR Payment Agreement in January 2013										
Servicer	Foreclosure in Progress				Foreclosure Complete				Total	
	Sampled File Reviews		Requested File Reviews		Sampled File Reviews		Requested File Reviews		Reviews Complete	Error Rate
Reviews Complete	Error Rate	Reviews Complete	Error Rate	Reviews Complete	Error Rate	Reviews Complete	Error Rate			
MetLife	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A	0.0%	N/A
HSBC	1.3%	0.0%	2.0%	0.0%	1.7%	0.0%	1.0%	0.0%	1.3%	0.0%
Aurora	1.3%	2.7%	0.4%	5.3%	1.7%	15.5%	0.3%	3.6%	0.9%	8.9%
Bank of America	12.1%	10.9%	4.3%	0.0%	21.7%	22.7%	1.2%	0.0%	6.0%	8.9%
Citibank	19.7%	0.0%	0.2%	0.0%	19.5%	0.0%	0.4%	0.0%	4.2%	0.0%
Sovereign ¹	30.9%	10.1%	0.6%	0.0%	36.2%	2.6%	4.5%	18.2%	25.9%	6.3%
Wells Fargo	33.6%	19.3%	3.7%	0.5%	38.3%	24.6%	7.3%	0.8%	9.6%	11.4%
U.S. Bank	42.0%	2.0%	0.1%	0.0%	55.5%	0.9%	0.3%	0.0%	27.1%	1.2%
JPMorgan Chase	47.7%	0.2%	1.7%	9.9%	14.6%	1.1%	1.7%	17.2%	22.9%	0.6%
PNC	49.5%	26.7%	27.5%	32.1%	49.8%	15.6%	33.4%	17.8%	40.9%	23.9%

1. Now Santander Bank, N.A.

¹⁶ See the “June 21, 2012 Financial Remediation Framework” at <http://www.occ.gov/topics/consumer-protection/foreclosure-prevention/financial-remediation-framework.pdf>.

¹⁷ JPMorgan Chase accounted for 61,181 of the 103,820 files completed (59 percent). A majority of these files involved the review of mortgages involving bankruptcies where no error was found.

¹⁸ MetLife reported no completed files, and would not speculate on results.

Observations from the Review of EverBank Mortgage Servicing and Foreclosure Processes

At the time other servicers entered the IFR Payment Agreement, EverBank concluded that their independent consultant was making sufficient progress in their IFR and did not enter into the agreement with regulators. However, EverBank and the OCC later agreed that it was in the best interest of EverBank's in-scope borrowers that EverBank enter into an amended consent order on August 23, 2013.¹⁹ Payments to in-scope EverBank borrowers are expected to begin in the second quarter of 2014, more than a year later than payments to borrowers whose mortgages were serviced by the companies that entered amended consent orders earlier. Because payments to EverBank borrowers have not commenced, this report does not discuss distribution of those payments.

Table 5. EverBank Consultant Findings and Approved Remediation			
Category		Borrowers to be Compensated	Total Compensation
1	SCRA-related errors (Sections 533 & 521)	9	\$908,572
1	SCRA-related errors (Section 527)	34	\$114,113 ¹
2	Borrower not in default	5	\$25,000
3a	Error after trial loan modification completed	1	\$35,000
3b	Error after trial loan modification approved	2	\$140,000
4	Forbearance Plan	1	\$15,000
5	Modification denied in error	113	\$2,240,909
6	No Follow Up on Loan Modification Application	4	\$12,200
7	Never solicited loan modification	0	0
8	Failed to approve modification in prescribed timeframe	0	0
9	Used wrong interest rate in an approved modification	9	\$54,983
10	Bankruptcy	7	\$15,487
11	Servicer did not have standing to foreclose	3	\$9,728
12	Servicer failed to provide legally sufficient notice	5	\$20,517
13	General Errors	6,992	\$9,681,592
	Payments to Remaining in-Scope Borrowers With No Harm Identified	25,389	\$26,658,450
	Total	32,574	\$39,931,551²

1. Amount to be adjusted upward to ensure each borrower in the category receives a minimum of \$1,050.

2. Amounts are rounded to the nearest dollar. Total is calculated from unrounded amounts.

Before EverBank entered its amended consent order, the EverBank consultant finished a significant portion of its reviews. The consultant completed review of all of the initial samples, requests for reviews, and all deeper dives except for those involving potential errors related to fees. In total, the EverBank consultant found compensable errors in 22 percent of the servicer's in-scope portfolio, and 97 percent of those errors involved relatively small errors related to fees. Conducting additional reviews to determine fee errors would have significantly delayed

¹⁹ See <http://www.occ.gov/news-issuances/news-releases/2013/nr-occ-2013-126.html>.

completion of the review and remediation. As a result, the amended consent order with EverBank required the servicer to provide compensation to 100 percent of its in-scope population. A minimum payment of \$1,050 was determined based on an analysis of completed reviews that showed the vast majority of fee errors fell below that amount.

Compensating 100 percent of the 32,574 eligible EverBank borrowers meant providing compensation to 25,389 borrowers whose reviews found no errors with harm.

Payments to the entire in-scope population for EverBank borrowers followed these guidelines:

- (a) borrowers whose files were not reviewed by the EverBank consultant and borrowers whose files were reviewed by the consultant with no finding of error will receive \$1,050;
- (b) borrowers whose file reviews were completed by the consultant with a finding of error with financial harm for categories 1 through 4 of the published 2012 financial remediation framework (2012 framework) will receive amount listed in the relevant category of the framework, including equity and interest amounts where applicable;
- (c) borrowers whose file reviews were completed by the consultant with a finding of error with financial harm for categories 5 through 12 of the framework will receive the amount listed in the relevant category of the 2012 framework, including equity and interest amounts where applicable and a payment equal to the amount of financial harm as determined by the consultant for each finding of error for categories that do not have amounts listed in the 2012 framework; and
- (d) borrowers not covered under (a) and (b) will receive either the higher of either \$1,050 or the amount of actual harm determined by the consultant under category 13.

Observations from the Review of OneWest Mortgage Servicing and Foreclosure Processes

OneWest did not enter into the IFR Payment Agreement with regulators and decided to complete its IFR for two key reasons. First, OneWest had a relatively small population of 192,199 in-scope borrowers, and OneWest believed that their consultant would complete the IFR engagement sooner than most. Second, OneWest also considered the unique circumstances of OneWest's previous ownership by the Federal Deposit Insurance Corporation (FDIC) and expressed concern that signing an amended consent order would obligate them for a period of activity that they had no control over and could subject the bank to additional liability.²⁰

Table 6. OneWest Consultant Findings and Approved Remediation, as of February 27, 2014

	Category	Number of Mortgages Recommended by Consultant For Remediation	Number of Mortgages Tested from In-scope Population	Error Rate as % of Number of Mortgages Tested	Amount of Remediation Recommended by Consultant	Borrowers with Compensation in Progress	Total Compensation in Progress
1	SCRA-related errors ¹	54	892	6.0538	\$2,946,986	54	\$2,946,986
2	Borrower not in default	23	178,886	.00129	\$730,719	23	\$730,719
3a	Error after trial loan modification completed	1	26,964	.00371	\$345,072	1	\$345,072
3b	Error after trial loan modification approved	1	26,964	.00371	\$125,000	1	\$125,000
4	Forbearance plan	0	26,964	0	0	0	0
5	Modification denied in error	43	26,964	.15947	\$641,444	43	\$641,444
6	No Follow Up on Loan Modification Application	34	26,964	.12609	\$68,185	34	\$68,185
7	Never solicited loan modification	56	26,964	.20768	\$58,729	56	\$58,729
8	Failed to approve modification in prescribed time frame	19	26,964	.07046	\$16,415	19	\$16,415
9	Used wrong interest rate in an approved modification	0	26,964	0	0	0	0
10	Bankruptcy	3	8,171	.03672	\$7,533	3	\$7,533
11	Servicer did not have standing to foreclose	0	3,836	0	0	0	0
12	Servicer failed to provide legally sufficient notice	0	21,564	0	0	0	0
13	General issues	10,547	192,199	5.4875	\$3,580,022	10,547	\$3,580,022
	Total	10,781			\$8,520,105²	10,781	\$8,520,105²

1. Includes both errors relating to sections 521, 527, and 533 of the SCRA.

2. Amounts are rounded to the nearest dollar. Total is calculated from unrounded amounts.

²⁰ From July 14, 2008 to March 18, 2009, the FDIC acted as conservator IndyMac Federal Bank, FSB, and approved loss mitigation solutions under the "FDIC Loan Modification Program." On March 19, 2009, all deposits of IndyMac Federal Bank, FSB, were transferred to OneWest Bank, FSB, Pasadena, California.

The consultant for OneWest is finalizing its IFR process. By the end of February 2014, a substantial number of file reviews were completed, and OneWest began remediation on March 3, 2014. At that time, the consultant had confirmed 10,781 borrowers (5.6 percent of the in-scope population of 192,199) were due remediation in the aggregate amount of \$8,520,105. As the independent consultant completes the remaining independent reviews, OneWest will continue to deliver remediation checks and review results through the summer of 2014. Remediation will follow the regulators' financial remediation framework published in June 2012.²¹ Because remediation began in March, this report does not discuss its distribution.

²¹ See <http://www.occ.gov/topics/consumer-protection/foreclosure-prevention/financial-remediation-framework.pdf>.

Appendix 1: Independent Foreclosure Review Agreement Amounts

Table 7 provides a summary of the amount of payments to eligible borrowers and other foreclosure prevention assistance that the OCC and FRB amended consent orders require from each participating servicer. Servicers have satisfied the amount to be paid to eligible borrowers by depositing the requisite amount into qualified settlement funds. Servicer activities to satisfy the required amount of additional foreclosure prevention assistance are underway.

Table 7: Independent Foreclosure Review Agreement Amounts				
	In-scope Borrowers	Required Amount to be Paid into the Qualified Settlement Funds	Required Amount of Other Foreclosure Prevention Assistance	Total
Aurora	109,408	\$108,000,000 ¹	\$149,000,000 ²	\$257,000,000
Bank of America	1,290,131	\$1,128,000,000	\$1,759,000,000	\$2,887,000,000
Citibank	357,103	\$307,000,000	\$487,000,000	\$794,000,000
EverBank	32,574	\$40,000,000	\$44,000,000 ²	\$84,000,000
GMAC Mortgage	232,000 ³	\$198,000,000	\$317,000,000 ²	\$515,000,000
Goldman Sachs	128,826	\$135,000,000	\$195,000,000	\$330,000,000
HSBC	112,474	\$97,000,000	\$153,000,000	\$250,000,000
JPMorgan Chase	883,886	\$757,000,000	\$1,205,000,000	\$1,962,000,000
MetLife	35,445	\$37,000,000	\$48,000,000 ²	\$85,000,000
Morgan Stanley	95,542	\$114,000,000	\$130,000,000 ²	\$244,000,000
PNC	81,475	\$69,000,000	\$111,000,000 ²	\$180,000,000
Sovereign	7,260	\$6,000,000	\$10,000,000	\$16,000,000
SunTrust	73,405	\$63,000,000	\$100,000,000	\$163,000,000
U.S. Bank	93,945	\$80,000,000	\$128,000,000	\$208,000,000
Wells Fargo	898,640	\$766,000,000	\$1,225,000,000	\$1,991,000,000
Totals	4,432,114	\$3,905,000,000	\$6,061,000,000	\$9,966,000,000

1. All dollar amounts rounded to nearest million.

2. Satisfied by payment of a lesser amount to the qualified settlement funds or a HUD-certified organization.

3. Approximate

Appendix 2: State-Level Payment Data for Qualified Settlement Fund 1

Table 8 provides the volume and value of checks that have been issued and paid (cashed or deposited by the recipient) for payments made by Qualified Settlement Fund 1 of the IFR Payment Agreement in each state through January 24, 2014. The table includes data from Rust Consulting, Inc., and may vary from other published numbers because of timing of check clearance, processing, and reporting. Qualified Settlement Fund 1 includes 11 of the banks that have entered into the IFR Payment Agreement—Aurora, Bank of America, Citibank, HSBC, JPMorgan Chase, MetLife Bank, PNC, Sovereign, SunTrust, U.S. Bank, and Wells Fargo. This table excludes payments to borrowers whose mortgages were serviced by EverBank, GMAC Mortgage, Goldman Sachs, and Morgan Stanley, which entered IFR payment agreements later, and OneWest that did not enter a payment agreement. Payments to OneWest borrowers began in March 2014.

Table 8: State-Level Payment Data as of January 24, 2014				
State	Issued Dollars	Issued Quantity	Paid Dollars	Paid Quantity
Alabama	\$37,440,887	38,907	\$31,171,506	31,808
Alaska	\$2,619,981	3,494	\$2,138,666	2,714
Arizona	\$184,222,656	180,997	\$156,527,443	150,670
Arkansas	\$14,744,048	19,001	\$11,892,394	15,234
California	\$643,701,405	652,031	\$549,911,504	539,162
Colorado	\$57,062,022	66,833	\$47,803,335	54,299
Connecticut	\$23,777,714	33,957	\$19,861,758	27,557
Delaware	\$8,978,131	11,171	\$6,887,740	8,967
District of Columbia	\$4,067,182	5,716	\$3,109,654	4,274
Florida	\$449,627,787	612,137	\$369,366,333	490,025
Georgia	\$161,742,719	161,671	\$133,410,152	132,400
Guam	\$5,700	11	\$2,600	3
Hawaii	\$8,348,025	11,060	\$6,762,045	8,663
Idaho	\$18,681,122	20,985	\$16,433,351	18,041
Illinois	\$143,009,364	183,129	\$119,014,570	146,742
Indiana	\$60,384,456	76,098	\$51,257,859	63,615
Iowa	\$16,165,713	21,398	\$14,147,835	18,222
Kansas	\$19,902,977	20,734	\$16,681,113	17,040
Kentucky	\$26,736,000	31,689	\$22,492,560	26,252

Table 8 continued.				
State	Issued Dollars	Issued Quantity	Paid Dollars	Paid Quantity
Louisiana	\$25,795,497	32,258	\$20,904,877	25,602
Maine	\$7,103,861	9,797	\$5,835,877	8,125
Maryland	\$58,371,875	74,503	\$47,249,352	58,428
Massachusetts	\$40,989,646	50,946	\$33,932,778	40,964
Michigan	\$144,616,896	157,638	\$127,251,848	134,749
Minnesota	\$59,981,507	68,993	\$53,765,380	59,948
Mississippi	\$17,569,797	19,327	\$14,810,454	15,813
Missouri	\$54,485,090	59,458	\$45,661,353	48,978
Montana	\$5,156,722	6,074	\$4,504,072	5,153
Nebraska	\$9,788,040	11,327	\$8,368,450	9,567
Nevada	\$107,222,382	112,314	\$91,689,595	93,361
New Hampshire	\$11,197,669	11,820	\$9,769,589	10,041
New Jersey	\$73,896,610	116,664	\$56,895,483	86,499
New Mexico	\$11,962,393	16,012	\$9,809,283	12,736
New York	\$91,800,896	126,347	\$70,632,285	94,448
North Carolina	\$70,826,126	82,135	\$59,319,358	67,718
North Dakota	\$1,172,680	1,484	\$922,360	1,259
Ohio	\$110,005,776	133,335	\$92,277,863	110,392
Oklahoma	\$28,148,312	28,019	\$22,162,439	21,738
Oregon	\$40,371,226	45,048	\$35,062,549	37,756
Pennsylvania	\$68,468,197	86,517	\$55,998,407	68,958
Puerto Rico	\$1,732,720	2,764	\$1,289,540	1,911
Rhode Island	\$8,900,743	11,420	\$7,524,781	9,383
South Carolina	\$36,621,806	43,986	\$30,317,606	35,852
South Dakota	\$2,429,410	3,264	\$2,114,390	2,789
Tennessee	\$54,674,215	59,883	\$45,193,711	48,510
Texas	\$143,535,693	181,071	\$113,469,881	139,522
Utah	\$30,851,624	33,930	\$26,433,098	28,218
Vermont	\$1,817,146	2,737	\$1,582,993	2,314
Virgin Islands	\$156,172	314	\$98,710	197
Virginia	\$76,398,957	82,854	\$63,782,359	66,774
Washington	\$57,983,878	66,773	\$48,773,890	54,369
West Virginia	\$8,027,939	8,563	\$6,746,988	7,092
Wisconsin	\$39,838,918	46,495	\$35,199,909	40,346
Wyoming	\$2,423,480	2,840	\$2,087,130	2,310
Others	\$272,642	486	\$212,002	346
Total	\$3,385,814,432	3,948,415	\$2,830,523,060	3,207,854

Appendix 3: Aggregate Findings of Consultants as of December 31, 2012

The following table presents data provide by consultants as of December 31, 2012, on the categorization of all errors found as of that date.

Table 9. Aggregate Findings of Consultants as of December 31, 2012

Financial Injury Framework Category Counts																								
Foreclosures in Process	Total Stated for Review	Files - Initial or Final Review Complete	Files With No Errors	Files With Non-Financial Injury Errors ²	Files With Financial Injury Errors	1	2	3a	3b	4	5	6	7	8	9	10	11	12	13	Duplicate	Net Total	Completion Rate	Error Rate	
Look Back Files ¹	165,206	106,214																				64.3%		
Files -- Initial IC Work Complete ³		46,155		915	39,892	3	-	89	1	1	2,002	4,044	1,615	1,106	53	13,997	1,835	18,522	23,059	27,289	39,038	27.9%	86.4%	
Files -- Review Complete ⁴		60,059	55,708	2,371	1,980	69	1	45	2	-	211	45	86	12	26	51	49	162	1,711	490	1,980	36.4%	3.3%	
Outreach Files ⁵	249,299	27,866																				11.2%		
Files -- Initial IC Work Complete ³		18,537		331	14,606	4	-	51	-	3	920	4,299	1,192	1,455	29	372	238	2,956	12,228	10,292	13,455	7.4%	78.8%	
Files -- Review Complete ⁴		9,329	8,678	94	557	-	-	53	1	1	75	43	55	-	-	3	-	2	569	245	557	3.7%	6.0%	
																						Final Review Complete	16.7%	3.7%
Foreclosure Complete	Total Stated for Review	Files - Initial or Final Review Complete	Files With No Errors	Files With Non-Financial Injury Errors ²	Files With Financial Injury Errors	1	2	3a	3b	4	5	6	7	8	9	10	11	12	13	Duplicate	Net Total	Completion Rate	Error Rate	
Look Back Files ¹	151,182	108,268																				71.6%		
Files -- Initial IC Work Complete ³		79,774		829	67,829	21	-	22	5	19	546	922	1,291	188	7	58,395	1,219	6,533	8,745	10,383	67,530	52.8%	85.0%	
Files -- Review Complete ⁴		28,494	24,623	1,986	1,885	401	-	12	-	4	189	55	137	7	1	470	78	319	521	309	1,885	18.8%	8.6%	
Outreach Files ⁵	177,413	19,522																				11.0%		
Files -- Initial IC Work Complete ³		13,584		422	8,848	13	-	77	9	25	1,023	1,456	1,837	276	20	251	173	1,917	6,738	5,263	8,552	7.7%	65.1%	
Files -- Review Complete ⁴		5,938	5,574	92	248	3	1	10	1	-	52	19	63	-	1	1	-	5	156	64	248	3.3%	4.2%	
																						Final Review Complete	10.5%	6.2%
Aggregate Files	Total Stated for Review	Files - Initial or Final Review Complete	Files With No Errors	Files With Non-Financial Injury Errors ²	Files With Financial Injury Errors	1	2	3a	3b	4	5	6	7	8	9	10	11	12	13	Duplicate	Net Total	Completion Rate	Error Rate	
Look Back Files ¹	316,388	214,482																				67.8%		
Files -- Initial IC Work Complete ³		125,929		1,744	107,721	24	-	111	6	20	2,548	4,966	2,906	1,294	60	72,392	3,054	25,055	31,804	37,672	106,568	39.8%	85.5%	
Files -- Review Complete ⁴		88,553	80,331	4,357	3,865	470	1	57	2	4	400	100	223	19	27	521	127	481	2,232	799	3,865	28.0%	4.4%	
Outreach Files ⁵	426,712	47,388																				11.1%		
Files -- Initial IC Work Complete ³		32,121		753	23,454	17	-	128	9	28	1,943	5,755	3,029	1,731	49	623	411	4,873	18,966	15,555	22,007	7.5%	73.0%	
Files -- Review Complete ⁴		15,267	14,252	186	805	3	1	63	2	1	127	62	118	-	1	4	-	7	725	309	805	3.6%	5.3%	
																						Final Review Complete	14.0%	4.5%

1. Total Sample, which includes internal and referred complaints subject to 100 percent review.
2. Includes only those files with errors not resulting in financial injury. This count is mutually exclusive from the "Files with Financial Injury Errors" count.
3. Includes only those files where the IC completed an initial review, but final decision of financial injury/no injury pending for receipt of additional documents from the servicer or for IC's quality control review.
4. Includes only those files where the IC rendered the final decision of financial injury/no injury.
5. Outreach file totals do not include 271 files received through the request for review process as of December 31, 2012, that were out of scope.

Appendix 4: Payments by Category

Table 10 provides the number of eligible borrowers and payment amounts in each payment category for borrowers covered by Qualified Settlement Fund 1 of the IFR Payment Agreement through January 24, 2014. Qualified Settlement Fund 1 includes 11 of the banks that have entered into the IFR Payment Agreement—Aurora, Bank of America, Citibank, HSBC, JPMorgan Chase, MetLife Bank, PNC, Sovereign, SunTrust, U.S. Bank, and Wells Fargo. This table excludes payments to borrowers whose mortgages were serviced by EverBank, GMAC Mortgage, Goldman Sachs, and Morgan Stanley, which entered IFR payment agreements later, and a third category, OneWest, which did not enter a payment agreement.

The table contains only standard payout amounts; it does not include amounts for lost equity, which borrowers in the first and third categories may receive in addition to the standard payout amounts, nor the payments calculated on a case-by-case basis in the second category. Throughout the table below the "number of borrowers paid" represents the number of borrowers who cashed or deposited checks. Total amount received by borrowers in the first and third categories listed here may differ from amount shown because of offsets resulting from other legal settlements. Servicemembers who were charged interest rates higher than limits allowed by the SCRA Section 527 will receive payments of \$300 or the amount overcharged and paid by the borrower, whichever is greater.

Table 10. Payments in Qualified Settlement Fund 1 by Payment Category											
Category	Foreclosure Stage	Borrowers Who Requested a Review				All Other Borrowers				Total Borrowers in Category	Total Borrowers Paid
		Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checks Cashed	Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checks Cashed		
Servicer foreclosed on borrower eligible for Servicemembers Civil Relief Act (SCRA) protection (applies only to rescinded or completed foreclosures)*	Rescinded	8	\$15,000	6	\$90,000	108	\$15,000	80	\$1,137,650	116	86
	Completed	123	\$125,000	113	\$12,697,425	959	\$125,000	729	\$85,544,935	1,082	842
Servicer charged servicemembers interest rates that exceed SCRA Section 527 limits**	In process	33	>=\$300	26	\$136,518	317	>=\$300	260	\$1,329,332	350	286
	Completed	11	>=\$300	11	\$17,047	63	>=\$300	53	\$85,103	74	64

Table 10 continued.											
Category	Foreclosure Stage	Borrowers Who Requested a Review				All Other Borrowers				Total Borrowers in Category	Total Borrowers Paid
		Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checked Cashed	Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checked Cashed		
Servicer initiated or completed foreclosure on borrower who was not in default*	In process	46	\$5,000	42	\$210,000	543	\$5,000	444	\$2,212,650	589	486
	Rescinded	8	\$15,000	9	\$134,559	29	\$15,000	19	\$285,000	37	28
	Completed	8	\$125,000	8	\$1,000,000	45	\$125,000	32	\$4,342,760	53	40
Servicer initiated or completed foreclosure on borrower who was protected by federal bankruptcy law	In process	2,401	\$7,500	2,317	\$17,336,025	19,860	\$3,750	17,326	\$64,789,013	22,261	19,643
	Rescinded	28	\$7,500	25	\$185,400	160	\$3,750	134	\$496,200	188	159
	Completed	763	\$62,500	678	\$42,357,500	5,075	\$31,250	3,841	\$119,564,063	5,838	4,519
Servicer completed foreclosure on borrower who was meeting all requirements of documented forbearance plan (applies only to rescinded or completed foreclosures)	Rescinded	50	\$6,000	46	\$276,000	185	\$3,000	149	\$446,160	235	195
	Completed	162	\$24,000	140	\$3,360,000	684	\$12,000	465	\$5,559,840	846	605
Servicer failed to convert borrower to permanent modification after three successful payments under a written trial-period plan	In process	461	\$6,000	438	\$2,624,640	2,436	\$3,000	2,110	\$6,304,800	2,897	2,548
	Rescinded	31	\$6,000	29	\$174,000	91	\$3,000	78	\$234,000	122	107
	Completed	239	\$50,000	219	\$10,904,500	718	\$25,000	551	\$13,745,250	957	770

Table 10 continued.											
Category	Foreclosure Stage	Borrowers Who Requested a Review				All Other Borrowers				Total Borrowers in Category	Total Borrowers Paid
		Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checked Cashed	Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checked Cashed		
Servicer completed foreclosure on borrower who was performing all requirements of the written trial-period plan	Rescinded	29	\$6,000	26	\$156,000	126	\$3,000	106	\$314,640	155	132
	Completed	163	\$50,000	142	\$7,086,000	477	\$25,000	345	\$8,586,500	640	487
Modification request approved	In process	118,177	\$500	110,233	\$55,114,100	746,894	\$300	626,686	\$187,991,760	865,071	736,919
	Rescinded	2,617	\$500	2,428	\$1,213,850	9,229	\$300	7,363	\$2,208,810	11,846	9,791
	Completed	39,368	\$500	37,140	\$18,570,000	195,448	\$300	154,075	\$46,219,980	234,816	191,215
Modification request denied	In process	62,557	\$2,000	57,771	\$115,234,260	432,595	\$1,000	353,525	\$351,906,993	495,152	411,296
	Rescinded	1,539	\$2,000	1,426	\$2,839,820	6,007	\$1,000	4,778	\$4,744,290	7,546	6,204
	Completed	60,251	\$6,000	57,138	\$341,870,700	309,597	\$3,000	254,590	\$759,560,893	369,848	311,728
Modification request received but no underwriting decision made	In process	21,153	\$800	19,570	\$15,623,800	200,596	\$400	160,262	\$64,100,720	221,749	179,832
	Rescinded	709	\$800	659	\$525,744	3,757	\$400	2,924	\$1,169,480	4,466	3,583
	Completed	27,152	\$800	25,700	\$20,506,056	168,479	\$400	133,436	\$53,367,080	195,631	159,136
Servicer did not engage with borrower in a loan modification or other loss mitigation action	In process	16,679	\$600	15,386	\$9,207,282	312,881	\$300	223,756	\$67,123,020	329,560	239,142
	Rescinded	350	\$600	329	\$196,980	4,549	\$300	3,184	\$955,020	4,899	3,513
	Completed	36,564	\$600	34,647	\$20,734,392	531,912	\$300	394,563	\$118,350,630	568,476	429,210

Table 10 continued.											
Category	Foreclosure Stage	Borrowers Who Requested a Review				All Other Borrowers				Total Borrowers in Category	Total Borrowers Paid
		Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checked Cashed	Number of Borrowers In Category	Payment	Number of Borrowers Paid	Dollar Amount of Checked Cashed		
All other loans	In process	21,459	\$500	20,236	\$10,118,000	334,630	\$300	272,649	\$81,780,300	356,089	292,885
	Rescinded	450	\$500	428	\$214,000	4,161	\$300	3,246	\$973,620	4,611	3,674
	Completed	24,959	\$500	23,816	\$11,907,850	218,737	\$300	174,913	\$52,470,120	243,696	198,729
Totals		438,548		411,182	\$722,622,448	3,511,348		2,796,672	\$2,107,900,611	3,949,896*	3,207,854

*"Total Borrowers in Category" represents 100 percent of eligible borrowers for servicers included in Qualified Settlement Fund 1. The 1,481 difference between this total and the "Issued Quantity" total from table 8 represents the remaining checks to be issued under Qualified Settlement Fund 1.

Appendix 5: Servicer Foreclosure Prevention Activity Reported by State

The following data provide an overview of the loss mitigation and foreclosure prevention assistance in each state as reported by participating servicers through January 24, 2014. Regulators are in the process of verifying the reported activity for the purpose of crediting servicers toward fulfilling their obligations under the amended consent orders. This data represent foreclosure prevention activity reported by Bank of America, Citibank, HSBC, JPMorgan Chase, Sovereign, U.S. Bank, and Wells Fargo. In the table below, servicers are ordered by the volume of loss mitigation and foreclosure activity from largest to smallest (left to right).

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Alabama	# of Loans	26	17	5		21	4			1	1				75
	UPB Before Action	\$3,543,563	\$1,399,388	\$629,810		\$2,287,435	\$161,727			\$83,669	\$111,486				\$8,217,079
	Avg. UPB Before Action	\$136,291	\$82,317	\$125,962		\$108,925	\$40,432			\$83,669	\$111,486				\$109,561
	Avg. Sales Price (Short Sales only)										\$45,000				\$45,000
	Deficiency Waived										\$85,487				\$85,487
	Avg. Deficiency Waived										\$85,487				\$85,487
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	8.13%	8.09%	8.94%		7.16%	8.87%			8.75%					7.95%
	Avg. Interest Rate After Action	6.77%	5.57%	6.84%		4.85%	8.87%			2.46%					6.01%
	Avg. DTI Before Action	40%	42%	45%		33%	10%			58%					37%
	Avg. DTI After Action	28%	26%	30%		22%	5%			31%					25%
	Avg. Payment Reduction (if applicable)	\$374.40	\$269.45	\$443.59		\$311.26	\$99.67			\$371.40					\$322.16
Alaska	# of Loans	1					1								2
	UPB Before Action	\$251,573					\$110,236								\$361,809
	Avg. UPB Before Action	\$251,573					\$110,236								\$180,904
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	9.94%					11.00%								10.47%
	Avg. Interest Rate After Action	6.06%					11.00%								8.53%
	Avg. DTI Before Action	35%					11%								23%
	Avg. DTI After Action	31%					7%								19%
	Avg. Payment Reduction (if applicable)	\$328.12					\$419.29								\$373.71
Arizona	# of Loans	138	44	54	30	20	8	33		3	8		1		339
	UPB Before Action	\$28,537,616	\$8,525,350	\$10,123,660	\$4,580,232	\$3,796,272	\$778,829	\$9,407,694		\$432,252	\$1,994,970		\$131,873		\$68,308,748
	Avg. UPB Before Action	\$206,794	\$193,758	\$187,475	\$152,674	\$189,814	\$97,354	\$285,082		\$144,084	\$249,371		\$131,873		\$201,501
	Avg. Sales Price (Short Sales only)				\$80,990			\$196,604			\$118,875		\$100,000		\$138,453
	Deficiency Waived				\$2,477,096			\$3,507,340			\$1,191,898		\$48,117		\$7,224,451
	Avg. Deficiency Waived				\$82,570			\$106,283			\$148,987		\$48,117		\$100,340
	Transition Assistance Provided				\$78,000			\$3,000							\$81,000
	Avg. Interest Rate Before Action	5.18%	5.49%	5.65%		5.60%	6.21%			8.47%					5.43%
	Avg. Interest Rate After Action	3.94%	4.74%	3.95%		4.48%	5.39%			4.88%					4.17%
	Avg. DTI Before Action	45%	40%	46%		33%	12%			49%					42%
	Avg. DTI After Action	29%	27%	30%		20%	7%			31%					28%
	Avg. Payment Reduction (if applicable)	\$425.67	\$414.87	\$423.67		\$439.48	\$214.90			\$522.16					\$419.29
Arkansas	# of Loans	18	3			4	2	1							28
	UPB Before Action	\$2,465,005	\$603,854			\$438,807	\$134,175	\$81,332							\$3,723,173
	Avg. UPB Before Action	\$136,945	\$201,285			\$109,702	\$67,087	\$81,332							\$132,970
	Avg. Sales Price (Short Sales only)							\$105,500							\$105,500
	Deficiency Waived							\$8,419							\$8,419
	Avg. Deficiency Waived							\$8,419							\$8,419
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	7.03%	8.17%			8.13%	6.32%								7.26%
	Avg. Interest Rate After Action	3.87%	6.25%			5.87%	6.32%								4.61%
	Avg. DTI Before Action	44%	40%			20%	6%								37%
	Avg. DTI After Action	32%	23%			14%	4%								26%
	Avg. Payment Reduction (if applicable)	\$351.68	\$911.85			\$186.59	\$62.20								\$368.02
California	# of Loans	2,021	709	1,221	132	132	267	153		7	34		1	12	4,689
	UPB Before Action	\$812,560,229	\$279,051,881	\$377,805,852	\$23,864,264	\$42,587,002	\$35,076,703	\$59,347,509		\$1,658,833	\$13,841,075		\$379,091	\$4,818,635	\$1,650,991,074
	Avg. UPB Before Action	\$402,059	\$393,585	\$309,423	\$180,790	\$322,629	\$131,373	\$387,892		\$236,976	\$407,090		\$379,091	\$401,553	\$352,099
	Avg. Sales Price (Short Sales only)				\$105,469			\$270,472			\$221,894		\$254,333		\$199,095
	Deficiency Waived				\$12,384,229			\$22,769,978			\$7,439,644		\$2,108,951		\$44,702,802
	Avg. Deficiency Waived				\$93,820			\$148,823			\$218,813		\$175,746		\$135,054
	Transition Assistance Provided				\$368,408			\$41,000			\$12,500				\$421,908
	Avg. Interest Rate Before Action	4.87%	4.82%	5.31%		5.43%	5.21%			6.33%			6.50%		5.02%
	Avg. Interest Rate After Action	3.26%	3.24%	3.54%		4.07%	4.59%			3.61%			4.00%		3.44%
	Avg. DTI Before Action	49%	46%	49%		37%	10%			47%			28%		46%
	Avg. DTI After Action	31%	28%	30%		25%	6%			31%			14%		29%
	Avg. Payment Reduction (if applicable)	\$860.84	\$810.40	\$735.06		\$701.90	\$257.11			\$490.13			\$1,415.11		\$775.12

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Colorado	# of Loans	45	17	6	6	8	22	15		2	4				125
	UPB Before Action	\$10,261,272	\$3,347,415	\$1,337,413	\$893,461	\$1,148,663	\$1,551,757	\$4,398,507		\$312,083	\$893,468				\$24,144,039
	Avg. UPB Before Action	\$228,028	\$196,907	\$222,902	\$148,910	\$143,583	\$70,534	\$293,234		\$156,041	\$223,367				\$193,152
	Avg. Sales Price (Short Sales only)				\$104,625			\$253,560			\$194,550				\$208,374
	Deficiency Waived				\$352,479			\$883,316			\$228,851				\$1,464,646
	Avg. Deficiency Waived				\$58,746			\$58,888			\$57,213				\$58,586
	Transition Assistance Provided				\$9,000			\$3,000			\$2,500				\$14,500
	Avg. Interest Rate Before Action	6.39%	5.89%	6.54%		7.10%	8.53%			8.54%					6.89%
	Avg. Interest Rate After Action	3.48%	3.75%	4.38%		4.15%	5.64%			4.87%					4.13%
	Avg. DTI Before Action	46%	41%	46%		42%	10%			46%					37%
	Avg. DTI After Action	32%	28%	30%		26%	5%			28%					25%
Avg. Payment Reduction (if applicable)	\$491.97	\$433.94	\$501.00		\$427.58	\$199.59			\$396.46					\$411.26	
Connecticut	# of Loans	151	45	29	5	21	22	3		2	3	3	7	1	292
	UPB Before Action	\$39,987,377	\$12,097,947	\$7,493,543	\$822,610	\$4,635,297	\$1,406,513	\$883,574		\$365,998	\$661,056	\$715,803	\$1,321,909	\$170,645	\$70,562,273
	Avg. UPB Before Action	\$264,817	\$268,843	\$258,398	\$164,522	\$220,728	\$63,932	\$294,525		\$182,999	\$220,352	\$238,601	\$188,844	\$170,645	\$241,652
	Avg. Sales Price (Short Sales only)				\$86,600			\$199,167			\$134,333		\$130,676		\$130,457
	Deficiency Waived				\$440,929			\$331,493			\$324,275		\$515,460		\$1,612,156
	Avg. Deficiency Waived				\$88,186			\$110,498			\$108,092		\$73,637		\$89,564
	Transition Assistance Provided				\$12,000			\$0			\$5,000				\$17,000
	Avg. Interest Rate Before Action	6.58%	6.25%	5.84%		6.13%	7.55%			9.04%		4.88%			6.49%
	Avg. Interest Rate After Action	3.85%	3.67%	2.83%		3.92%	7.13%			9.04%		4.17%			4.02%
	Avg. DTI Before Action	47%	44%	50%		38%	9%			38%		25%			43%
	Avg. DTI After Action	31%	28%	31%		26%	5%			31%		21%			28%
Avg. Payment Reduction (if applicable)	\$744.11	\$800.23	\$771.13		\$622.51	\$188.94			\$239.33		\$379.44			\$694.43	
Delaware	# of Loans	15	7	7	1	6	4			2	1		4		47
	UPB Before Action	\$3,059,395	\$1,202,536	\$1,490,586	\$192,474	\$1,139,592	\$258,489			\$540,624	\$171,379		\$711,411		\$8,766,487
	Avg. UPB Before Action	\$203,960	\$171,791	\$212,941	\$192,474	\$189,932	\$64,622			\$270,312	\$171,379		\$177,853		\$186,521
	Avg. Sales Price (Short Sales only)				\$125,000						\$60,000		\$117,125		\$108,917
	Deficiency Waived				\$83,072						\$119,415		\$328,039		\$530,526
	Avg. Deficiency Waived				\$83,072						\$119,415		\$82,010		\$88,421
	Transition Assistance Provided				\$3,000										\$3,000
	Avg. Interest Rate Before Action	6.96%	5.79%	6.62%		6.95%	8.40%			8.85%					6.93%
	Avg. Interest Rate After Action	3.72%	4.58%	3.06%		3.96%	6.77%			7.33%					4.26%
	Avg. DTI Before Action	53%	32%	54%		35%	8%			41%					42%
	Avg. DTI After Action	32%	23%	31%		22%	5%			31%					26%
Avg. Payment Reduction (if applicable)	\$556.64	\$323.13	\$674.15		\$652.46	\$109.99			\$601.68					\$509.48	
District of Columbia	# of Loans	11	3	4			3								21
	UPB Before Action	\$3,424,084	\$779,553	\$1,139,546			\$539,265								\$5,882,448
	Avg. UPB Before Action	\$311,280	\$259,851	\$284,886			\$179,755								\$280,117
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	6.51%	8.21%	5.91%			5.13%								6.44%
	Avg. Interest Rate After Action	4.26%	3.54%	3.26%			5.13%								4.09%
	Avg. DTI Before Action	46%	50%	55%			7%								43%
	Avg. DTI After Action	29%	31%	31%			6%								26%
Avg. Payment Reduction (if applicable)	\$833.51	\$729.17	\$878.13			\$134.47								\$727.24	
Florida	# of Loans	1,079	434	418	178	162	77	29		2	73	2	16		2,470
	UPB Before Action	\$229,624,108	\$88,636,960	\$87,206,115	\$26,886,156	\$27,032,412	\$5,744,692	\$6,910,334		\$498,223	\$16,452,306	\$375,074	\$3,992,044		\$493,358,424
	Avg. UPB Before Action	\$212,812	\$204,233	\$208,627	\$151,046	\$166,867	\$74,606	\$238,287		\$249,112	\$225,374	\$187,537	\$249,503		\$199,740
	Avg. Sales Price (Short Sales only)				\$83,651			\$140,388			\$110,630		\$165,250		\$100,274
	Deficiency Waived				\$14,790,576			\$3,287,703			\$10,526,936		\$2,086,081		\$30,691,297
	Avg. Deficiency Waived				\$83,093			\$113,369			\$144,205		\$130,380		\$103,687
	Transition Assistance Provided				\$502,500			\$3,000			\$37,000				\$542,500
	Avg. Interest Rate Before Action	6.32%	5.86%	5.31%		6.51%	5.89%			6.60%		6.50%			6.03%
	Avg. Interest Rate After Action	4.28%	3.82%	3.58%		4.31%	5.00%			6.02%		4.31%			4.08%
	Avg. DTI Before Action	48%	44%	47%		35%	10%			41%		25%			45%
	Avg. DTI After Action	30%	27%	30%		22%	6%			29%		17%			28%
Avg. Payment Reduction (if applicable)	\$641.54	\$559.13	\$537.37		\$504.38	\$177.17			\$175.68		\$501.94			\$577.84	

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Georgia	# of Loans	319	106	25	3	100	40	11		3	3				610
	UPB Before Action	\$52,221,976	\$16,289,749	\$3,384,160	\$407,733	\$13,283,031	\$1,650,552	\$2,551,056		\$516,976	\$426,686				\$90,731,918
	Avg. UPB Before Action	\$163,705	\$153,677	\$135,366	\$135,911	\$132,830	\$41,264	\$231,914		\$172,325	\$142,229				\$148,741
	Avg. Sales Price (Short Sales only)				\$89,000			\$135,985			\$74,000				\$116,755
	Deficiency Waived				\$211,834			\$1,196,218			\$275,667				\$1,683,719
	Avg. Deficiency Waived				\$70,611			\$108,747			\$91,889				\$99,042
	Transition Assistance Provided				\$6,000			\$0							\$6,000
	Avg. Interest Rate Before Action	5.90%	6.29%	7.43%		6.70%	7.70%			8.11%					6.30%
	Avg. Interest Rate After Action	4.56%	4.83%	5.67%		4.90%	6.94%			8.11%					4.89%
	Avg. DTI Before Action	44%	44%	40%		32%	8%			35%					39%
	Avg. DTI After Action	29%	27%	28%		21%	5%			30%					25%
Avg. Payment Reduction (if applicable)	\$400.98	\$450.18	\$329.31		\$381.83	\$101.58			\$185.14					\$382.24	
Hawaii	# of Loans	33	6	1		1	3								44
	UPB Before Action	\$12,825,540	\$2,349,245	\$280,029		\$415,249	\$359,730								\$16,229,793
	Avg. UPB Before Action	\$388,653	\$391,541	\$280,029		\$415,249	\$119,910								\$368,859
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	5.76%	5.29%	5.00%		2.00%	6.22%								5.62%
	Avg. Interest Rate After Action	3.04%	3.83%	2.00%		2.00%	5.21%								3.25%
	Avg. DTI Before Action	52%	42%	46%		42%	10%								48%
	Avg. DTI After Action	32%	27%	31%		31%	7%								29%
Avg. Payment Reduction (if applicable)	\$884.56	\$609.64	\$439.96		\$424.05	\$227.23								\$781.69	
Idaho	# of Loans	16	1	5	1	1	3	5		1	1				34
	UPB Before Action	\$2,859,773	\$82,960	\$875,783	\$229,263	\$127,349	\$235,186	\$882,950		\$153,810	\$166,325				\$5,613,398
	Avg. UPB Before Action	\$178,736	\$82,960	\$175,157	\$229,263	\$127,349	\$78,395	\$176,590		\$153,810	\$166,325				\$165,100
	Avg. Sales Price (Short Sales only)				\$198,500			\$101,423			\$181,500				\$126,730
	Deficiency Waived				\$47,623			\$412,148			\$7,760				\$467,531
	Avg. Deficiency Waived				\$47,623			\$82,430			\$7,760				\$66,790
	Transition Assistance Provided				\$3,000										\$3,000
	Avg. Interest Rate Before Action	6.47%	9.67%	5.88%		10.07%	8.14%			5.92%					6.78%
	Avg. Interest Rate After Action	4.43%	9.67%	2.59%		7.19%	8.27%			5.92%					4.87%
	Avg. DTI Before Action	45%	46%	49%		58%	18%			38%					43%
	Avg. DTI After Action	29%	31%	31%		31%	14%			28%					28%
Avg. Payment Reduction (if applicable)	\$392.60	\$278.62	\$459.58		\$706.45	\$97.57			\$301.86					\$376.26	
Illinois	# of Loans	386	217	118	20	141	59	28		4	7	6	26	2	1,014
	UPB Before Action	\$82,014,418	\$40,970,716	\$24,623,477	\$2,891,823	\$24,160,822	\$3,035,480	\$7,854,033		\$683,915	\$1,503,609	\$1,105,547	\$4,681,425	\$325,863	\$193,851,127
	Avg. UPB Before Action	\$212,473	\$188,805	\$208,674	\$144,591	\$171,353	\$51,449	\$280,501		\$170,979	\$214,801	\$184,258	\$180,055	\$162,931	\$191,175
	Avg. Sales Price (Short Sales only)				\$73,422			\$187,004			\$101,414		\$128,269		\$132,709
	Deficiency Waived				\$1,728,866			\$3,360,644			\$1,013,158		\$2,205,734		\$8,308,402
	Avg. Deficiency Waived				\$86,443			\$120,023			\$144,737		\$84,836		\$102,573
	Transition Assistance Provided				\$51,000			\$3,000			\$5,000				\$59,000
	Avg. Interest Rate Before Action	6.30%	5.85%	5.85%		5.97%	7.64%			8.34%			5.54%		6.18%
	Avg. Interest Rate After Action	4.23%	4.20%	3.83%		4.35%	5.72%			4.68%			3.71%		4.28%
	Avg. DTI Before Action	48%	43%	49%		32%	9%			39%			25%		42%
	Avg. DTI After Action	30%	26%	30%		22%	4%			30%			19%		26%
Avg. Payment Reduction (if applicable)	\$679.39	\$580.59	\$647.48		\$485.31	\$164.27			\$479.81			\$507.42		\$588.31	
Indiana	# of Loans	43	34	3	1	43	5	9		2	2	1	3	1	147
	UPB Before Action	\$5,302,749	\$4,053,326	\$432,822	\$139,666	\$4,401,284	\$247,569	\$970,970		\$153,758	\$256,756	\$70,518	\$363,242	\$65,866	\$16,458,525
	Avg. UPB Before Action	\$123,320	\$119,215	\$144,274	\$139,666	\$102,355	\$49,514	\$107,886		\$76,879	\$128,378	\$70,518	\$121,081	\$65,866	\$111,963
	Avg. Sales Price (Short Sales only)				\$57,000			\$74,046			\$111,450		\$125,000		\$88,087
	Deficiency Waived				\$95,075			\$373,248			\$72,145		\$127,966		\$668,434
	Avg. Deficiency Waived				\$95,075			\$41,472			\$36,072		\$42,655		\$44,562
	Transition Assistance Provided				\$3,000			\$0			\$2,500				\$5,500
	Avg. Interest Rate Before Action	8.25%	8.22%	7.46%		7.18%	9.27%			10.15%			7.13%		7.93%
	Avg. Interest Rate After Action	5.01%	5.54%	2.50%		4.38%	7.99%			2.00%			4.00%		4.94%
	Avg. DTI Before Action	45%	43%	37%		28%	11%			64%			28%		37%
	Avg. DTI After Action	30%	26%	24%		18%	7%			31%			18%		24%
Avg. Payment Reduction (if applicable)	\$350.84	\$372.20	\$464.15		\$344.14	\$189.52			\$449.83			\$213.56		\$351.08	

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Iowa	# of Loans	4	4			6	3	7		3	1				28
	UPB Before Action	\$313,801	\$573,455			\$595,931	\$98,584	\$795,546		\$365,574	\$119,086				\$2,861,976
	Avg. UPB Before Action	\$78,450	\$143,364			\$99,322	\$32,861	\$113,649		\$121,858	\$119,086				\$102,213
	Avg. Sales Price (Short Sales only)							\$77,071			\$91,000				\$78,813
	Deficiency Waived							\$319,008			\$42,927				\$361,935
	Avg. Deficiency Waived							\$45,573			\$42,927				\$45,242
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	8.50%	7.28%			7.58%	8.31%			8.42%					7.94%
	Avg. Interest Rate After Action	2.56%	4.47%			5.94%	8.31%			3.54%					4.97%
	Avg. DTI Before Action	51%	39%			23%	5%			49%					33%
	Avg. DTI After Action	31%	29%			17%	5%			31%					22%
	Avg. Payment Reduction (if applicable)	\$319.71	\$320.68			\$255.56	\$37.72			\$450.46					\$277.97
Kansas	# of Loans	11	7		1	10	2	2			2				35
	UPB Before Action	\$1,550,799	\$667,178		\$84,563	\$1,244,534	\$90,199	\$404,726			\$382,182				\$4,424,181
	Avg. UPB Before Action	\$140,982	\$95,311		\$84,563	\$124,453	\$45,099	\$202,363			\$191,091				\$126,405
	Avg. Sales Price (Short Sales only)				\$50,000			\$154,000			\$130,000				\$123,600
	Deficiency Waived				\$41,866			\$124,263			\$183,046				\$349,175
	Avg. Deficiency Waived				\$41,866			\$62,132			\$91,523				\$69,835
	Transition Assistance Provided				\$3,000			\$3,000							\$6,000
	Avg. Interest Rate Before Action	6.62%	8.76%			7.95%	9.05%								7.72%
	Avg. Interest Rate After Action	4.34%	6.71%			4.79%	3.44%								4.98%
	Avg. DTI Before Action	39%	38%			32%	8%								35%
	Avg. DTI After Action	29%	25%			21%	3%								24%
	Avg. Payment Reduction (if applicable)	\$313.60	\$310.70			\$423.80	\$254.17								\$345.89
Kentucky	# of Loans	19	8	1		11	5	4		4	2				54
	UPB Before Action	\$2,791,357	\$1,048,092	\$95,988		\$1,088,764	\$238,656	\$2,990,648		\$486,257	\$422,704				\$9,162,466
	Avg. UPB Before Action	\$146,914	\$131,011	\$95,988		\$98,979	\$47,731	\$747,662		\$121,564	\$211,352				\$169,675
	Avg. Sales Price (Short Sales only)							\$430,375			\$161,000				\$340,583
	Deficiency Waived							\$1,401,457			\$176,377				\$1,577,834
	Avg. Deficiency Waived							\$350,364			\$88,188				\$262,972
	Transition Assistance Provided							\$0			\$2,500				\$2,500
	Avg. Interest Rate Before Action	7.67%	7.34%	3.73%		7.50%	10.84%			9.49%					7.97%
	Avg. Interest Rate After Action	3.36%	4.81%	2.00%		4.66%	9.89%			3.66%					4.58%
	Avg. DTI Before Action	48%	43%	49%		29%	7%			56%					39%
	Avg. DTI After Action	31%	28%	31%		19%	5%			31%					25%
	Avg. Payment Reduction (if applicable)	\$466.11	\$354.08	\$264.41		\$322.92	\$143.10			\$513.61					\$380.73
Louisiana	# of Loans	25	10	4		10	1			1	1				52
	UPB Before Action	\$4,185,310	\$1,331,511	\$510,123		\$906,073	\$42,731			\$124,603	\$86,069				\$7,186,421
	Avg. UPB Before Action	\$167,412	\$133,151	\$127,531		\$90,607	\$42,731			\$124,603	\$86,069				\$138,200
	Avg. Sales Price (Short Sales only)										\$40,000				\$40,000
	Deficiency Waived										\$53,187				\$53,187
	Avg. Deficiency Waived										\$53,187				\$53,187
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	7.26%	8.83%	8.63%		7.98%	14.09%			11.44%					8.03%
	Avg. Interest Rate After Action	4.58%	5.60%	6.07%		4.53%	14.09%			11.36%					5.20%
	Avg. DTI Before Action	41%	36%	40%		36%	17%			33%					38%
	Avg. DTI After Action	30%	26%	24%		24%	7%			30%					27%
	Avg. Payment Reduction (if applicable)	\$385.10	\$403.59	\$394.91		\$310.71	\$318.78			\$127.23					\$368.55
Maine	# of Loans	5	6			1	4	1					1	1	19
	UPB Before Action	\$1,253,140	\$815,199			\$98,535	\$302,857	\$242,093					\$131,333	\$220,835	\$3,063,991
	Avg. UPB Before Action	\$250,628	\$135,866			\$98,535	\$75,714	\$242,093					\$131,333	\$220,835	\$161,263
	Avg. Sales Price (Short Sales only)							\$90,000			\$242,900				\$166,450
	Deficiency Waived							\$165,249							\$187,021
	Avg. Deficiency Waived							\$165,249							\$93,510
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	6.30%	7.03%			6.37%	6.71%						5.88%		6.63%
	Avg. Interest Rate After Action	4.88%	5.45%			6.37%	6.83%						4.25%		5.59%
	Avg. DTI Before Action	44%	36%			39%	6%						19%		30%
	Avg. DTI After Action	30%	26%			31%	5%						16%		22%
	Avg. Payment Reduction (if applicable)	\$658.97	\$355.91			\$148.29	\$101.87						\$199.16		\$363.84

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Maryland	# of Loans	233	121	65	10	53	42	3		9	7		2	1	546
	UPB Before Action	\$71,633,428	\$39,422,531	\$18,305,584	\$1,702,591	\$15,583,767	\$3,368,673	\$761,392		\$2,054,510	\$2,376,198		\$454,521	\$177,513	\$155,840,708
	Avg. UPB Before Action	\$307,440	\$325,806	\$281,624	\$170,259	\$294,033	\$80,207	\$253,797		\$228,279	\$339,457		\$227,260	\$177,513	\$285,423
	Avg. Sales Price (Short Sales only)				\$91,700			\$149,000			\$205,143		\$187,500		\$144,318
	Deficiency Waived				\$943,125			\$368,255			\$1,174,722		\$135,471		\$2,621,572
	Avg. Deficiency Waived				\$94,313			\$122,752			\$167,817		\$67,735		\$119,162
	Transition Assistance Provided				\$24,500						\$7,500				\$32,000
	Avg. Interest Rate Before Action	5.57%	5.75%	5.28%		5.61%	6.93%			8.15%					5.73%
	Avg. Interest Rate After Action	3.81%	4.08%	3.21%		4.21%	6.41%			6.02%					4.09%
	Avg. DTI Before Action	45%	40%	48%		30%	9%			41%					40%
	Avg. DTI After Action	30%	26%	30%		22%	5%			29%					26%
	Avg. Payment Reduction (if applicable)	\$654.63	\$721.34	\$689.40		\$635.29	\$171.05			\$489.74					\$630.75
	Massachusetts	# of Loans	132	66	25	3	15	42	5			3	10	41	342
UPB Before Action		\$38,020,958	\$19,402,096	\$7,204,688	\$449,401	\$3,517,907	\$3,174,932	\$1,857,982		\$1,220,671		\$2,135,358	\$9,081,744		\$86,065,735
Avg. UPB Before Action		\$288,038	\$293,971	\$288,188	\$149,800	\$234,527	\$75,594	\$371,596		\$406,890		\$213,536	\$221,506		\$251,654
Avg. Sales Price (Short Sales only)					\$94,600			\$299,780				\$192,640			\$199,422
Deficiency Waived					\$231,953			\$512,756			\$649,974		\$3,108,343		\$4,503,027
Avg. Deficiency Waived					\$77,318			\$102,551			\$216,658		\$75,813		\$86,597
Transition Assistance Provided					\$6,000						\$2,500				\$8,500
Avg. Interest Rate Before Action		6.01%	5.63%	5.40%		5.50%	6.89%					5.92%			5.97%
Avg. Interest Rate After Action		3.48%	3.53%	2.73%		4.32%	5.30%					3.75%			3.74%
Avg. DTI Before Action		46%	42%	48%		30%	8%					35%			38%
Avg. DTI After Action		31%	27%	31%		23%	5%					25%			26%
Avg. Payment Reduction (if applicable)		\$714.63	\$723.35	\$713.23		\$438.76	\$159.64					\$485.37			\$613.94
Michigan		# of Loans	158	101	19	2	69	24	13		2	3	2	9	402
	UPB Before Action	\$25,712,585	\$13,068,941	\$2,842,481	\$245,941	\$9,082,534	\$1,122,775	\$2,536,561		\$354,611	\$428,999	\$282,495	\$997,864		\$56,675,787
	Avg. UPB Before Action	\$162,738	\$129,395	\$149,604	\$122,971	\$131,631	\$46,782	\$195,120		\$177,306	\$143,000	\$141,247	\$110,874		\$140,985
	Avg. Sales Price (Short Sales only)				\$70,500			\$103,108			\$48,667		\$74,835		\$85,219
	Deficiency Waived				\$124,607			\$1,348,285			\$332,116		\$493,439		\$2,298,448
	Avg. Deficiency Waived				\$62,304			\$103,714			\$110,705		\$54,827		\$85,128
	Transition Assistance Provided				\$6,000			\$0							\$6,000
	Avg. Interest Rate Before Action	6.89%	6.92%	6.94%		6.63%	8.10%			9.96%		6.56%			6.94%
	Avg. Interest Rate After Action	5.46%	5.20%	4.25%		4.22%	6.80%			7.46%		3.31%			5.19%
	Avg. DTI Before Action	43%	38%	50%		29%	9%			47%		26%			37%
	Avg. DTI After Action	29%	24%	30%		18%	5%			26%		23%			24%
	Avg. Payment Reduction (if applicable)	\$462.20	\$389.45	\$514.42		\$445.88	\$140.32			\$622.84		\$366.17			\$421.99
	Minnesota	# of Loans	65	32	11	2	27	21	30		4	2			194
UPB Before Action		\$13,783,126	\$6,804,917	\$2,139,552	\$298,984	\$5,437,179	\$1,115,257	\$6,854,824		\$697,447	\$466,827				\$37,598,113
Avg. UPB Before Action		\$212,048	\$212,654	\$194,505	\$149,492	\$201,377	\$53,107	\$228,494		\$174,362	\$233,414				\$193,805
Avg. Sales Price (Short Sales only)					\$73,250			\$147,950			\$131,500				\$142,588
Deficiency Waived					\$168,676			\$2,887,165			\$237,140				\$3,292,981
Avg. Deficiency Waived					\$84,338			\$96,239			\$118,570				\$96,852
Transition Assistance Provided					\$3,000			\$4,000							\$7,000
Avg. Interest Rate Before Action		6.41%	5.84%	5.80%		6.32%	7.13%			7.11%					6.35%
Avg. Interest Rate After Action		4.57%	4.12%	3.69%		4.42%	5.72%			5.10%					4.56%
Avg. DTI Before Action		44%	38%	46%		31%	7%			39%					36%
Avg. DTI After Action		30%	26%	31%		20%	4%			30%					24%
Avg. Payment Reduction (if applicable)		\$535.66	\$489.17	\$514.83		\$548.71	\$146.34			\$375.86					\$472.04
Mississippi		# of Loans	27	13	1		22	4			2				69
	UPB Before Action	\$4,138,805	\$1,381,397	\$92,994		\$2,293,629	\$152,942			\$186,118					\$8,245,885
	Avg. UPB Before Action	\$153,289	\$106,261	\$92,994		\$104,256	\$38,235			\$93,059					\$119,506
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	7.31%	8.75%	7.13%		7.67%	10.40%			9.35%					7.93%
	Avg. Interest Rate After Action	4.62%	6.70%	6.00%		4.11%	8.25%			7.60%					5.16%
	Avg. DTI Before Action	44%	39%	58%		31%	14%			40%					38%
	Avg. DTI After Action	30%	26%	31%		23%	7%			30%					26%
	Avg. Payment Reduction (if applicable)	\$410.42	\$316.85	\$363.63		\$270.07	\$164.47			\$188.67					\$326.66

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign		State Totals	
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale		Deeds in Lieu
Missouri	# of Loans	61	53	11	1	39	19	15		3	4	2	1	209	
	UPB Before Action	\$8,388,954	\$5,975,474	\$1,633,141	\$83,410	\$4,711,953	\$799,797	\$2,344,054		\$282,668	\$605,405	\$153,988	\$54,466	\$25,033,311	
	Avg. UPB Before Action	\$137,524	\$112,745	\$148,467	\$83,410	\$120,819	\$42,095	\$156,270		\$94,223	\$151,351	\$76,994	\$54,466	\$119,777	
	Avg. Sales Price (Short Sales only)				\$30,000			\$99,073			\$100,000	\$43,000		\$91,005	
	Deficiency Waived				\$59,883			\$1,025,012			\$302,679	\$86,550		\$1,474,125	
	Avg. Deficiency Waived				\$59,883			\$68,334			\$75,670	\$43,275		\$67,006	
	Transition Assistance Provided				\$3,000			\$0						\$3,000	
	Avg. Interest Rate Before Action	6.75%	7.38%	6.34%		7.02%	8.19%			8.04%					7.13%
	Avg. Interest Rate After Action	5.04%	5.58%	2.95%		4.99%	6.95%			6.28%					5.27%
	Avg. DTI Before Action	45%	41%	51%		28%	9%			42%					37%
	Avg. DTI After Action	30%	25%	31%		20%	5%			31%					24%
	Avg. Payment Reduction (if applicable)	\$362.63	\$371.68	\$522.40		\$317.04	\$152.41			\$299.61					\$342.61
Montana	# of Loans	2	1											3	
	UPB Before Action	\$518,503	\$338,996											\$857,499	
	Avg. UPB Before Action	\$259,252	\$338,996											\$285,833	
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	4.75%	3.38%												4.29%
	Avg. Interest Rate After Action	2.81%	2.38%												2.67%
	Avg. DTI Before Action	51%	45%												49%
	Avg. DTI After Action	31%	31%												31%
	Avg. Payment Reduction (if applicable)	\$563.37	\$695.95												\$607.56
Nebraska	# of Loans	4	6	1		4	1	1						17	
	UPB Before Action	\$402,132	\$551,638	\$58,773		\$333,631	\$31,802	\$67,529						\$1,445,505	
	Avg. UPB Before Action	\$100,533	\$91,940	\$58,773		\$83,408	\$31,802	\$67,529						\$85,030	
	Avg. Sales Price (Short Sales only)							\$40,000						\$40,000	
	Deficiency Waived							\$33,380						\$33,380	
	Avg. Deficiency Waived							\$33,380						\$33,380	
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	9.02%	8.78%	10.88%		9.45%	6.50%								9.00%
	Avg. Interest Rate After Action	6.76%	5.70%	2.00%		4.86%	6.50%								5.57%
	Avg. DTI Before Action	38%	38%	49%		35%	2%								36%
	Avg. DTI After Action	29%	27%	31%		23%	2%								25%
	Avg. Payment Reduction (if applicable)	\$242.87	\$288.99	\$379.82		\$353.10	\$16.99								\$282.16
Nevada	# of Loans	210	36	47	26	25	5	32		1	6	2		390	
	UPB Before Action	\$53,760,628	\$7,897,819	\$9,218,341	\$4,131,044	\$5,115,318	\$263,727	\$11,013,275		\$108,640	\$1,300,568	\$1,373,007		\$94,182,367	
	Avg. UPB Before Action	\$256,003	\$219,384	\$196,135	\$158,886	\$204,613	\$52,745	\$344,165		\$108,640	\$216,761	\$686,503		\$241,493	
	Avg. Sales Price (Short Sales only)				\$91,408			\$207,340			\$90,000	\$412,500		\$157,219	
	Deficiency Waived				\$2,093,352			\$4,957,466			\$876,294	\$649,431		\$8,576,542	
	Avg. Deficiency Waived				\$80,514			\$154,921			\$146,049	\$324,715		\$129,948	
	Transition Assistance Provided				\$66,000			\$0						\$66,000	
	Avg. Interest Rate Before Action	5.06%	5.28%	5.36%		5.81%	5.70%			6.20%					5.20%
	Avg. Interest Rate After Action	4.04%	3.90%	4.47%		4.75%	4.65%			6.20%					4.16%
	Avg. DTI Before Action	48%	58%	47%		40%	8%			37%					48%
	Avg. DTI After Action	29%	31%	29%		23%	5%			31%					28%
	Avg. Payment Reduction (if applicable)	\$600.64	\$600.15	\$455.22		\$580.67	\$148.34			\$146.87					\$569.57
New Hampshire	# of Loans	21	9	2		9	12	1			1	2		57	
	UPB Before Action	\$4,721,496	\$2,061,471	\$654,462		\$1,714,519	\$640,018	\$322,293			\$179,174	\$313,358		\$10,606,791	
	Avg. UPB Before Action	\$224,833	\$229,052	\$327,231		\$190,502	\$53,335	\$322,293			\$179,174	\$156,679		\$186,084	
	Avg. Sales Price (Short Sales only)							\$205,000			\$74,000	\$142,500		\$141,000	
	Deficiency Waived							\$134,766			\$146,561	\$60,562		\$341,889	
	Avg. Deficiency Waived							\$134,766			\$146,561	\$30,281		\$85,472	
	Transition Assistance Provided							\$0						\$0	
	Avg. Interest Rate Before Action	6.14%	4.81%	4.82%		6.32%	7.85%								6.28%
	Avg. Interest Rate After Action	4.06%	3.29%	3.42%		4.47%	5.41%								4.28%
	Avg. DTI Before Action	42%	34%	40%		34%	7%								31%
	Avg. DTI After Action	31%	26%	31%		25%	4%								23%
	Avg. Payment Reduction (if applicable)	\$451.27	\$410.03	\$563.24		\$411.23	\$171.91								\$378.44

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo	Citibank		US Bank		HSBC		Sovereign			State Totals	
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale		Deeds in Lieu
New Jersey	# of Loans	309	112	78	13	40	38			3	12	15	25	4	649
	UPB Before Action	\$98,593,431	\$35,403,173	\$22,782,270	\$2,257,958	\$11,017,349	\$2,591,675			\$597,886	\$3,334,151	\$3,630,606	\$6,112,034	\$1,043,111	\$187,363,645
	Avg. UPB Before Action	\$319,073	\$316,100	\$292,080	\$173,689	\$275,434	\$68,202			\$199,295	\$277,846	\$242,040	\$244,481	\$260,778	\$288,696
	Avg. Sales Price (Short Sales only)				\$91,627						\$140,008		\$167,836		\$141,343
	Deficiency Waived				\$1,289,155						\$2,205,581		\$2,489,109		\$5,983,845
	Avg. Deficiency Waived				\$99,166						\$183,798		\$99,564		\$119,677
	Transition Assistance Provided				\$44,431						\$12,500				\$56,931
	Avg. Interest Rate Before Action	6.21%	5.39%	5.28%		6.48%	7.25%			6.29%		5.77%			6.01%
	Avg. Interest Rate After Action	3.41%	3.06%	2.92%		4.33%	6.09%			3.46%		3.72%			3.52%
	Avg. DTI Before Action	48%	43%	47%		30%	7%			58%		48%			43%
	Avg. DTI After Action	32%	28%	31%		22%	4%			31%		37%			29%
	Avg. Payment Reduction (if applicable)	\$908.04	\$850.92	\$754.94		\$730.68	\$149.66			\$455.67		\$501.24			\$804.32
New Mexico	# of Loans	28	3	5	1	1	3	1		2	1				45
	UPB Before Action	\$5,218,856	\$646,307	\$941,114	\$164,162	\$33,790	\$205,794	\$900,000		\$270,285	\$238,000				\$8,618,308
	Avg. UPB Before Action	\$186,388	\$215,436	\$188,223	\$164,162	\$33,790	\$68,598	\$900,000		\$135,143	\$238,000				\$191,518
	Avg. Sales Price (Short Sales only)				\$132,500			\$625,000			\$146,200				\$301,233
	Deficiency Waived				\$48,996			\$320,774			\$115,716				\$485,487
	Avg. Deficiency Waived				\$48,996			\$320,774			\$115,716				\$161,829
	Transition Assistance Provided				\$0						\$2,500				\$2,500
	Avg. Interest Rate Before Action	7.29%	8.89%	6.61%		10.00%	6.46%			9.24%					7.42%
	Avg. Interest Rate After Action	4.77%	2.96%	3.06%		2.00%	3.38%			4.77%					4.27%
	Avg. DTI Before Action	44%	53%	56%		52%	9%			47%					44%
	Avg. DTI After Action	31%	28%	30%		31%	4%			30%					29%
	Avg. Payment Reduction (if applicable)	\$474.73	\$808.37	\$660.40		\$192.56	\$124.49			\$500.18					\$490.14
New York	# of Loans	354	128	56	1	50	119	2		7	9	10	13	6	755
	UPB Before Action	\$136,656,016	\$49,432,050	\$18,445,210	\$175,797	\$15,556,908	\$12,171,048	\$1,179,099		\$1,926,828	\$3,072,762	\$1,841,387	\$2,741,614	\$1,245,371	\$244,444,088
	Avg. UPB Before Action	\$386,034	\$386,188	\$329,379	\$175,797	\$311,138	\$102,278	\$589,550		\$275,261	\$341,418	\$184,139	\$210,893	\$207,562	\$323,767
	Avg. Sales Price (Short Sales only)				\$100,000			\$450,000			\$204,718		\$142,800		\$187,955
	Deficiency Waived				\$85,200			\$462,304			\$1,687,365		\$1,360,415		\$3,595,284
	Avg. Deficiency Waived				\$85,200			\$231,152			\$187,485		\$104,647		\$143,811
	Transition Assistance Provided				\$0						\$5,000				\$5,000
	Avg. Interest Rate Before Action	6.35%	5.74%	5.81%		6.07%	6.28%			9.63%		6.45%			6.20%
	Avg. Interest Rate After Action	2.93%	3.08%	3.22%		3.32%	5.11%			5.19%		3.63%			3.39%
	Avg. DTI Before Action	50%	44%	49%		38%	8%			49%		23%			41%
	Avg. DTI After Action	32%	29%	31%		25%	5%			31%		17%			26%
	Avg. Payment Reduction (if applicable)	\$1,089.37	\$1,006.65	\$927.43		\$763.92	\$193.96			\$891.87		\$455.87			\$881.91
North Carolina	# of Loans	132	36	9		34	11	2		16	3	1	2	1	247
	UPB Before Action	\$21,228,253	\$4,751,564	\$1,353,589		\$3,383,471	\$655,977	\$492,949		\$1,838,753	\$392,620	\$175,304	\$202,631	\$127,140	\$34,602,249
	Avg. UPB Before Action	\$160,820	\$131,988	\$150,399		\$99,514	\$59,634	\$246,475		\$114,922	\$130,873	\$175,304	\$101,315	\$127,140	\$140,090
	Avg. Sales Price (Short Sales only)							\$216,000			\$104,333		\$75,000		\$127,857
	Deficiency Waived							\$102,808			\$128,177		\$67,277		\$298,262
	Avg. Deficiency Waived							\$51,404			\$42,726		\$33,639		\$42,609
	Transition Assistance Provided										\$3,500				\$3,500
	Avg. Interest Rate Before Action	6.36%	7.32%	7.17%		7.00%	8.67%			10.00%		5.00%			6.97%
	Avg. Interest Rate After Action	3.98%	5.26%	4.18%		4.64%	8.07%			6.40%		4.00%			4.62%
	Avg. DTI Before Action	43%	39%	50%		32%	8%			45%		31%			40%
	Avg. DTI After Action	30%	26%	29%		22%	5%			30%		24%			27%
	Avg. Payment Reduction (if applicable)	\$368.87	\$327.62	\$536.50		\$292.11	\$83.81			\$353.44		\$258.28			\$343.44
North Dakota	# of Loans	1													1
	UPB Before Action	\$160,268													\$160,268
	Avg. UPB Before Action	\$160,268													\$160,268
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	7.88%													7.88%
	Avg. Interest Rate After Action	2.00%													2.00%
	Avg. DTI Before Action	51%													51%
Avg. DTI After Action	31%													31%	
Avg. Payment Reduction (if applicable)	\$637.27													\$637.27	

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Ohio	# of Loans	98	54	10	1	69	17	11		11	7	1	1	280	
	UPB Before Action	\$14,512,391	\$6,463,785	\$1,332,036	\$66,279	\$7,995,470	\$454,247	\$1,242,385		\$1,997,280	\$904,204	\$94,962	\$113,731	\$35,176,770	
	Avg. UPB Before Action	\$148,086	\$119,700	\$133,204	\$66,279	\$115,876	\$26,720	\$112,944		\$181,571	\$129,172	\$94,962	\$113,731	\$125,631	
	Avg. Sales Price (Short Sales only)				\$22,000			\$55,373			\$65,443		\$72,000	\$58,060	
	Deficiency Waived				\$51,236			\$707,492			\$582,840		\$51,470	\$1,393,038	
	Avg. Deficiency Waived				\$51,236			\$64,317			\$83,263		\$51,470	\$69,652	
	Transition Assistance Provided				\$3,000			\$0			\$2,500			\$5,500	
	Avg. Interest Rate Before Action	7.12%	7.26%	6.77%		6.94%	8.20%			7.30%		7.25%		7.17%	
	Avg. Interest Rate After Action	4.91%	4.80%	3.75%		4.23%	6.79%			3.60%		4.00%		4.72%	
	Avg. DTI Before Action	44%	40%	47%		28%	9%			46%		26%		37%	
	Avg. DTI After Action	30%	26%	31%		19%	5%			30%		16%		24%	
	Avg. Payment Reduction (if applicable)	\$417.88	\$359.62	\$434.88		\$386.58	\$109.20			\$622.92		\$382.08		\$386.48	
Oklahoma	# of Loans	15	4	2		4	4				1			30	
	UPB Before Action	\$2,094,182	\$373,291	\$283,413		\$390,964	\$149,744			\$163,117				\$3,454,711	
	Avg. UPB Before Action	\$139,612	\$93,323	\$141,707		\$97,741	\$37,436			\$163,117				\$115,157	
	Avg. Sales Price (Short Sales only)									\$135,000				\$135,000	
	Deficiency Waived									\$46,463				\$46,463	
	Avg. Deficiency Waived									\$46,463				\$46,463	
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	7.82%	5.84%	9.52%		7.60%	8.23%							7.69%	
	Avg. Interest Rate After Action	4.27%	3.38%	4.01%		3.84%	6.49%							4.38%	
	Avg. DTI Before Action	50%	36%	45%		36%	8%							40%	
	Avg. DTI After Action	33%	26%	31%		19%	5%							26%	
	Avg. Payment Reduction (if applicable)	\$398.95	\$217.27	\$307.72		\$427.88	\$67.82							\$325.91	
Oregon	# of Loans	52	22	9	2	4	13	12			1			115	
	UPB Before Action	\$11,463,002	\$4,526,446	\$2,264,332	\$291,836	\$746,609	\$1,048,404	\$2,900,060		\$194,772				\$23,435,460	
	Avg. UPB Before Action	\$220,442	\$205,748	\$251,592	\$145,918	\$186,652	\$80,646	\$241,672		\$194,772				\$203,787	
	Avg. Sales Price (Short Sales only)				\$105,950			\$169,021		\$170,000				\$160,677	
	Deficiency Waived				\$103,949			\$1,044,639		\$57,168				\$1,205,757	
	Avg. Deficiency Waived				\$51,975			\$87,053		\$57,168				\$80,384	
	Transition Assistance Provided				\$3,000			\$0						\$3,000	
	Avg. Interest Rate Before Action	6.30%	5.33%	6.90%		5.50%	7.80%							6.30%	
	Avg. Interest Rate After Action	2.75%	3.56%	3.10%		4.38%	5.81%							3.42%	
	Avg. DTI Before Action	52%	42%	58%		30%	11%							44%	
	Avg. DTI After Action	32%	28%	31%		22%	6%							27%	
	Avg. Payment Reduction (if applicable)	\$625.62	\$468.98	\$825.91		\$376.79	\$180.52							\$541.37	
Pennsylvania	# of Loans	108	52	24		42	24	2		10	4	32	43	8	349
	UPB Before Action	\$19,687,447	\$8,848,353	\$4,815,798		\$5,768,672	\$1,355,209	\$274,431		\$1,521,986	\$723,725	\$4,658,346	\$6,856,337	\$886,506	\$55,396,810
	Avg. UPB Before Action	\$182,291	\$170,161	\$200,658		\$137,349	\$56,467	\$137,216		\$152,199	\$180,931	\$145,573	\$159,450	\$110,813	\$158,730
	Avg. Sales Price (Short Sales only)							\$79,950			\$110,475		\$146,698		\$141,016
	Deficiency Waived							\$131,748		\$392,585		\$2,071,278		\$2,595,610	
	Avg. Deficiency Waived							\$65,874		\$98,146		\$48,169		\$52,972	
	Transition Assistance Provided							\$0		\$1,500				\$1,500	
	Avg. Interest Rate Before Action	6.86%	7.21%	6.53%		7.13%	8.39%			9.02%		5.90%		7.03%	
	Avg. Interest Rate After Action	4.22%	4.86%	4.00%		4.22%	7.44%			6.36%		4.02%		4.63%	
	Avg. DTI Before Action	45%	39%	45%		34%	9%			43%		28%		38%	
	Avg. DTI After Action	31%	27%	30%		21%	5%			30%		23%		26%	
	Avg. Payment Reduction (if applicable)	\$484.38	\$484.27	\$533.66		\$458.54	\$161.78			\$416.09		\$287.30		\$434.24	
Rhode Island	# of Loans	64	19	2	1	3	5	1				5	17	1	118
	UPB Before Action	\$15,388,623	\$4,433,743	\$488,017	\$167,584	\$717,740	\$199,686	\$226,449		\$1,250,660	\$3,139,715	\$131,724		\$26,143,942	
	Avg. UPB Before Action	\$240,447	\$233,355	\$244,009	\$167,584	\$239,247	\$39,937	\$226,449		\$250,132	\$184,689	\$131,724		\$221,559	
	Avg. Sales Price (Short Sales only)				\$108,000			\$200,000			\$118,306			\$122,063	
	Deficiency Waived				\$73,855			\$58,503			\$1,391,183			\$1,523,541	
	Avg. Deficiency Waived				\$73,855			\$58,503			\$81,834			\$80,186	
	Transition Assistance Provided				\$3,000			\$0						\$3,000	
	Avg. Interest Rate Before Action	4.82%	5.90%	4.88%		5.92%	8.84%					6.10%		5.34%	
	Avg. Interest Rate After Action	3.20%	3.61%	3.15%		4.04%	6.71%					3.20%		3.48%	
	Avg. DTI Before Action	49%	37%	48%		35%	7%					37%		44%	
	Avg. DTI After Action	31%	25%	31%		22%	5%					24%		28%	
	Avg. Payment Reduction (if applicable)	\$562.68	\$572.76	\$614.00		\$716.79	\$101.63					\$764.32		\$557.16	

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo	Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
South Carolina	# of Loans	40	13	7	22	8	1		5	4	1	1		102
	UPB Before Action	\$6,408,016	\$1,680,911	\$1,081,448	\$2,789,221	\$510,469	\$156,447		\$684,685	\$465,092	\$151,717	\$166,244		\$14,094,250
	Avg. UPB Before Action	\$160,200	\$129,301	\$154,493	\$126,783	\$63,809	\$156,447		\$136,937	\$116,273	\$151,717	\$166,244		\$138,179
	Avg. Sales Price (Short Sales only)						\$41,500			\$93,875		\$107,000		\$87,333
	Deficiency Waived						\$120,143			\$172,532		\$71,675		\$364,350
	Avg. Deficiency Waived						\$120,143			\$43,133		\$71,675		\$60,725
	Transition Assistance Provided						\$0			\$2,500				\$2,500
	Avg. Interest Rate Before Action	7.52%	7.29%	6.90%	7.53%	6.73%			8.68%		2.88%			7.39%
	Avg. Interest Rate After Action	4.87%	4.06%	4.16%	4.74%	5.97%			6.01%		2.00%			4.80%
	Avg. DTI Before Action	47%	39%	45%	32%	13%			46%		51%			39%
	Avg. DTI After Action	30%	25%	26%	21%	7%			31%		37%			25%
Avg. Payment Reduction (if applicable)	\$459.91	\$314.30	\$354.37	\$376.37	\$212.59			\$343.09		\$287.87			\$384.87	
South Dakota	# of Loans		1											1
	UPB Before Action		\$129,296											\$129,296
	Avg. UPB Before Action		\$129,296											\$129,296
	Avg. Sales Price (Short Sales only)													
	Deficiency Waived													
	Avg. Deficiency Waived													
	Transition Assistance Provided													
	Avg. Interest Rate Before Action		9.50%											9.50%
	Avg. Interest Rate After Action		3.38%											3.38%
	Avg. DTI Before Action		57%											57%
	Avg. DTI After Action		31%											31%
Avg. Payment Reduction (if applicable)		\$584.05											\$584.05	
Tennessee	# of Loans	79	37	9	34	6	2		1	2				170
	UPB Before Action	\$10,561,462	\$4,265,801	\$1,202,982	\$4,176,381	\$160,374	\$400,203		\$86,758	\$596,586				\$21,450,546
	Avg. UPB Before Action	\$133,689	\$115,292	\$133,665	\$122,835	\$26,729	\$200,102		\$86,758	\$298,293				\$126,180
	Avg. Sales Price (Short Sales only)						\$163,000			\$207,500				\$185,250
	Deficiency Waived						\$95,322			\$244,114				\$339,436
	Avg. Deficiency Waived						\$47,661			\$122,057				\$84,859
	Transition Assistance Provided									\$2,500				\$2,500
	Avg. Interest Rate Before Action	7.52%	7.09%	7.82%	7.27%	9.23%			7.75%					7.45%
	Avg. Interest Rate After Action	5.31%	5.64%	5.33%	4.59%	8.09%			4.20%					5.33%
	Avg. DTI Before Action	43%	36%	44%	28%	6%			40%					37%
	Avg. DTI After Action	29%	25%	29%	19%	5%			30%					25%
Avg. Payment Reduction (if applicable)	\$360.71	\$294.97	\$411.90	\$386.52	\$41.97			\$286.61					\$342.15	
Texas	# of Loans	165	53	6	27	21	2		4	4				283
	UPB Before Action	\$22,278,880	\$7,014,343	\$756,842	\$3,049,908	\$617,468	\$384,698		\$318,307	\$567,152				\$35,064,385
	Avg. UPB Before Action	\$135,024	\$132,346	\$126,140	\$112,960	\$29,403	\$192,349		\$79,577	\$141,788				\$123,902
	Avg. Sales Price (Short Sales only)						\$167,425			\$111,975				\$118,250
	Deficiency Waived						\$40,166			\$283,155				\$413,762
	Avg. Deficiency Waived						\$40,166			\$70,789				\$59,109
	Transition Assistance Provided						\$3,000			\$2,500				\$5,500
	Avg. Interest Rate Before Action	7.14%	6.50%	6.68%	6.70%	8.67%			10.90%					7.14%
	Avg. Interest Rate After Action	3.91%	3.92%	4.97%	4.10%	7.16%			8.24%					4.27%
	Avg. DTI Before Action	42%	36%	40%	34%	6%			39%					37%
	Avg. DTI After Action	31%	26%	29%	24%	4%			29%					28%
Avg. Payment Reduction (if applicable)	\$348.14	\$304.45	\$369.21	\$297.54	\$77.33			\$227.79					\$312.91	
Utah	# of Loans	62	5	5	8	7	2			3				96
	UPB Before Action	\$15,589,401	\$1,609,608	\$1,469,892	\$1,998,099	\$677,923	\$462,869			\$641,966				\$23,519,037
	Avg. UPB Before Action	\$251,442	\$321,922	\$293,978	\$178,213	\$249,762	\$231,435			\$213,989				\$239,990
	Avg. Sales Price (Short Sales only)						\$128,500			\$180,667				\$148,642
	Deficiency Waived						\$331,252			\$229,958				\$71,028
	Avg. Deficiency Waived						\$55,209			\$53,273				\$65,548
	Transition Assistance Provided						\$18,000			\$2,500				\$20,500
	Avg. Interest Rate Before Action	7.22%	5.24%	6.14%	6.73%	8.03%								7.06%
	Avg. Interest Rate After Action	3.91%	2.99%	3.45%	4.79%	7.31%								4.18%
	Avg. DTI Before Action	46%	39%	43%	41%	15%								43%
	Avg. DTI After Action	32%	29%	31%	26%	7%								29%
Avg. Payment Reduction (if applicable)	\$601.79	\$422.49	\$535.05	\$616.46	\$313.92								\$565.83	

Foreclosure-Related Consent Orders Status Report, April 2014

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Vermont	# of Loans	1					1		1			1	2		6
	UPB Before Action	\$118,256					\$45,551		\$160,767			\$171,655	\$344,611		\$840,840
	Avg. UPB Before Action	\$118,256					\$45,551		\$160,767			\$171,655	\$172,306		\$140,140
	Avg. Sales Price (Short Sales only)												\$152,000		\$152,000
	Deficiency Waived								\$105,517				\$87,270		\$192,787
	Avg. Deficiency Waived								\$105,517				\$43,635		\$64,262
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	9.00%						9.50%					6.88%		8.46%
	Avg. Interest Rate After Action	6.63%						4.75%					4.00%		5.13%
	Avg. DTI Before Action	42%						10%					55%		36%
	Avg. DTI After Action	31%						5%					44%		27%
Avg. Payment Reduction (if applicable)	\$344.33						\$201.88					\$513.92		\$353.38	
Virginia	# of Loans	128	34	19	6	31	35	4		12	10		2	281	
	UPB Before Action	\$36,963,131	\$8,916,201	\$4,504,966	\$915,897	\$5,213,303	\$2,858,869	\$789,988		\$2,219,691	\$2,437,201		\$592,769	\$65,412,016	
	Avg. UPB Before Action	\$288,774	\$262,241	\$237,103	\$152,850	\$168,171	\$81,682	\$197,497		\$184,974	\$243,720		\$296,384	\$232,783	
	Avg. Sales Price (Short Sales only)				\$91,358			\$159,250			\$179,790		\$231,250	\$156,616	
	Deficiency Waived				\$430,060			\$211,581			\$861,232		\$171,175	\$1,674,048	
	Avg. Deficiency Waived				\$71,677			\$52,895			\$86,123		\$85,587	\$76,093	
	Transition Assistance Provided				\$12,000			\$0						\$12,000	
	Avg. Interest Rate Before Action	6.03%	5.95%	5.66%		7.16%	7.09%			8.28%				6.38%	
	Avg. Interest Rate After Action	3.93%	4.24%	2.59%		4.94%	6.09%			5.77%				4.37%	
	Avg. DTI Before Action	43%	40%	50%		29%	8%			43%				36%	
	Avg. DTI After Action	30%	27%	31%		20%	5%			30%				25%	
Avg. Payment Reduction (if applicable)	\$589.68	\$563.80	\$638.01		\$456.31	\$173.92			\$384.18				\$508.16		
Washington	# of Loans	113	73	53	10	21	13	13		2	4			302	
	UPB Before Action	\$31,976,715	\$20,253,660	\$14,095,972	\$1,696,627	\$3,862,774	\$1,353,258	\$4,431,136		\$299,621	\$672,896			\$78,642,659	
	Avg. UPB Before Action	\$282,980	\$277,447	\$265,962	\$169,663	\$183,942	\$104,097	\$340,857		\$149,811	\$168,224			\$260,406	
	Avg. Sales Price (Short Sales only)				\$115,370			\$258,419			\$143,125			\$188,357	
	Deficiency Waived				\$703,835			\$1,422,191			\$220,260			\$2,346,285	
	Avg. Deficiency Waived				\$70,383			\$109,399			\$55,065			\$86,899	
	Transition Assistance Provided				\$29,000			\$0						\$29,000	
	Avg. Interest Rate Before Action	5.77%	5.74%	5.47%		6.44%	7.71%			8.34%				5.87%	
	Avg. Interest Rate After Action	3.44%	3.12%	3.16%		4.43%	5.61%			5.84%				3.50%	
	Avg. DTI Before Action	46%	42%	50%		29%	12%			43%				43%	
	Avg. DTI After Action	31%	27%	31%		20%	7%			31%				28%	
Avg. Payment Reduction (if applicable)	\$593.81	\$632.05	\$683.30		\$444.81	\$267.95			\$322.68				\$592.45		
West Virginia	# of Loans	5	1			3	3			1				13	
	UPB Before Action	\$835,774	\$247,080			\$382,062	\$199,812			\$135,245				\$1,799,972	
	Avg. UPB Before Action	\$167,155	\$247,080			\$127,354	\$66,604			\$135,245				\$138,459	
	Avg. Sales Price (Short Sales only)														
	Deficiency Waived														
	Avg. Deficiency Waived														
	Transition Assistance Provided														
	Avg. Interest Rate Before Action	5.08%	8.85%			6.84%	4.92%			11.81%				6.25%	
	Avg. Interest Rate After Action	2.98%	4.98%			4.04%	3.00%			11.81%				4.06%	
	Avg. DTI Before Action	42%	44%			28%	7%			34%				30%	
	Avg. DTI After Action	29%	31%			16%	4%			30%				21%	
Avg. Payment Reduction (if applicable)	\$336.37	\$687.21			\$419.30	\$139.82			\$150.19				\$322.82		
Wisconsin	# of Loans	54	36	7	2	38	10	10		2	1			160	
	UPB Before Action	\$8,362,618	\$5,652,689	\$1,390,687	\$215,476	\$5,608,019	\$589,139	\$1,920,743		\$256,318	\$174,264			\$24,169,954	
	Avg. UPB Before Action	\$154,863	\$157,019	\$198,670	\$107,738	\$147,579	\$58,914	\$192,074		\$128,159	\$174,264			\$151,062	
	Avg. Sales Price (Short Sales only)				\$60,650			\$139,463			\$125,000			\$126,225	
	Deficiency Waived				\$116,469			\$667,282			\$61,011			\$844,762	
	Avg. Deficiency Waived				\$58,234			\$66,728			\$61,011			\$64,982	
	Transition Assistance Provided				\$0			\$0						\$0	
	Avg. Interest Rate Before Action	6.92%	7.32%	6.56%		7.06%	6.85%			9.17%				7.06%	
	Avg. Interest Rate After Action	4.76%	4.79%	3.66%		4.37%	4.89%			8.01%				4.67%	
	Avg. DTI Before Action	42%	41%	47%		32%	8%			37%				37%	
	Avg. DTI After Action	30%	28%	31%		21%	5%			31%				25%	
Avg. Payment Reduction (if applicable)	\$419.14	\$457.50	\$531.22		\$477.60	\$105.37			\$241.51				\$425.22		

State	Action	Bank of America	JPMorgan Chase	Wells Fargo		Citibank		US Bank		HSBC		Sovereign			State Totals
		First Lien Modifications	First Lien Modifications	First Lien Modifications	Short Sale	First Lien Modifications	Junior Lien Modifications	Short Sale	Deeds-in-Lieu	First Lien Modifications	Short Sale	First Lien Modifications	Short Sale	Deeds in Lieu	
Wyoming	# of Loans	2						1							3
	UPB Before Action	\$1,040,500						\$315,827							\$1,356,327
	Avg. UPB Before Action	\$520,250						\$315,827							\$452,109
	Avg. Sales Price (Short Sales only)							\$313,000							\$313,000
	Deficiency Waived							\$44,046							\$44,046
	Avg. Deficiency Waived							\$44,046							\$44,046
	Transition Assistance Provided							\$0							\$0
	Avg. Interest Rate Before Action	6.38%													6.38%
	Avg. Interest Rate After Action	4.31%													4.31%
	Avg. DTI Before Action	64%													64%
	Avg. DTI After Action	34%													34%
	Avg. Payment Reduction (if applicable)	\$1,182.69													\$1,182.69
Totals	# of Loans	7,089	2,799	2,384	466	1,392	1,043	467	1	134	235	92	234	26	16,362
	UPB Before Action	\$1,979,250,918	\$725,379,898	\$636,787,494	\$75,001,296	\$249,868,229	\$88,578,497	\$139,556,166	\$160,767	\$22,214,212	\$58,645,506	\$17,169,855	\$48,885,542	\$4,228,204	\$4,045,726,584
	Avg. UPB Before Action	\$279,200	\$259,157	\$267,109	\$160,947	\$179,503	\$84,927	\$298,835	\$160,767	\$165,778	\$249,555	\$186,629	\$208,913	\$162,623	\$247,264
	Avg. Sales Price (Short Sales only)				\$91,916			\$202,828			\$140,074		\$157,017		\$147,798
	Deficiency Waived				\$39,549,414			\$55,116,803	\$105,517		\$32,678,273		\$19,736,767		\$147,186,774
	Avg. Deficiency Waived				\$84,870			\$118,023	\$105,517		\$139,056		\$84,345		\$104,909
	Transition Assistance Provided				\$1,262,839			\$60,000			\$114,500				\$1,437,339
	Avg. Interest Rate Before Action	5.90%	5.85%	5.50%		6.51%	6.75%			8.58%		5.93%			5.97%
	Avg. Interest Rate After Action	3.85%	3.93%	3.57%		4.37%	5.66%			5.63%		3.81%			4.01%
	Avg. DTI Before Action	47%	43%	48%		33%	9%			44%		32%			42%
	Avg. DTI After Action	31%	27%	30%		22%	5%			30%		25%			27%
	Avg. Payment Reduction (if applicable)	\$685.55	\$627.48	\$665.71		\$485.53	\$186.71			\$433.32		\$425.38			\$614.14