New Mexico Mortgage Finance Authority

MFA

Housing New Mexico

Legislative Oversight Committee
August 1, 2014

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UNITED SOUTH BROADWAY CORPORATION

FORECLOSURE PROCESS TASK FORCE MEMO

To: Senator Michael Padilla
Date: July 27, 2014

Pursuant to SM 15 and HM 11, United South Broadway Corp. convened an inclusive Task Force of diverse stakeholders charged with recommending improvements to the foreclosure process in order to prevent unnecessary foreclosures, and developing a plan to educate homeowners, lenders, loan servicers and the judiciary on meaningful loss mitigation. The twenty-one Task Force members represent the mortgage lending industry, public officials, housing counselors, homeowners, and homeowner and creditor attorneys.

The Task Force met first on May 16 and will continue to meet every three Fridays until November, when it will submit recommendations to Memorial sponsors Senator Michael Padilla and Representative Gail Chasey, and the appropriate interim legislative committees. Attendance at all four Task Force meetings to date has been 90% - 100%.

During the first three meetings, the Task Force defined the scope of the problem and shared information necessary to establish a common framework for addressing problems in the foreclosure process. For example, creditor attorneys and housing counselors presented information on servicing issues and other systemic violations. A team from Wells Fargo Home Mortgage presented information on the lender process, including payment relief options and the loan modification process from their perspective. Industry and homeowner representatives agreed that the process described was aspirational, often not occurring on the ground. Some highlights from these discussions include: lack of adequate information and notice for homeowners; roadblocks to homeowners in the loss mitigation process; lack of enforcement of federal rules in most of our judicial districts; and poor communication between lenders and homeowners.

Out of these discussions, the Task Force identified four general areas of focus where they will develop recommendations: (1) loss mitigation and loan servicing; (2) improving the judicial process for foreclosure; (3) the negative social and economic impact of foreclosures, especially the problem of vacant and abandoned properties; and (4) stakeholder education, homeowner engagement in the foreclosure process, and lender-homeowner communication.

Four balanced committees are working to address each focus area. Committees are charged with drafting and prioritizing five recommendations to present to the entire body for deliberation by August 15, with the goal of identifying five (seven at most) final recommendations that can be written into legislation.

At the August 8 Task Force meeting, policy counsel for the Center for Responsible Lending will present information about what states can do --- and what other states have done --- to prevent unnecessary foreclosures. Following her presentation, committees will continue working to hone their recommendations for presentation to the full Task Force.

Overview of the CFPB

The Consumer Financial Protection Bureau ("CFPB" or "Bureau") was established under Title X of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act"). To create a single point of accountability in the federal government for consumer financial protection, the Dodd-Frank Act consolidated many of the consumer financial protection authorities previously shared by seven federal agencies into the CFPB and provided the Bureau with additional authorities to:

- Conduct rulemaking, supervision and enforcement with respect to the Federal consumer financial laws;
- Handle consumer complaints and inquiries;
- Promote financial education;
- Research consumer behavior; and,
- Monitor financial markets for risks to consumers.

OUR ORGANIZATION

The Bureau performs its work through six Divisions, described below. Our organizational chart is displayed in the appendix of this document.

Division descriptions

Supervision, Enforcement, and Fair Lending	Ensures compliance with Federal consumer financial laws by supervising market participants and bringing enforcement actions when appropriate.
Research, Markets, and Regulations	Responsible for understanding consumer financial markets and consumer behavior, evaluating whether there is a need for regulation, and determining the costs and benefits of potential or existing regulations.

Consumer Education and Engagement	Provides, through a variety of initiatives and methods, information to consumers that will allow them to make decisions that are best for them. Consumer education is a central mission of the Bureau. The Bureau is developing targeted outreach to groups that face particular challenges, as required by the Dodd-Frank Act.
Legal Division	Responsible for the Bureau's compliance with all applicable laws and provides advice to the Director and the Bureau's divisions.
External Affairs	Manages the Bureau's relationships with external stakeholders and ensures that the Bureau maintains robust dialogue with interested stakeholders to promote understanding, transparency, and accountability.
Operations	Builds and sustains the CFPB's operational infrastructure to support the entire organization. The division also includes the Office of Consumer Response, which handles consumer complaints and inquiries related to consumer financial products and services.

OUR MISSION

The CFPB is a 21st century agency that helps consumer finance markets work by making rules more effective, by consistently and fairly enforcing those rules, and by empowering consumers to take more control over their economic lives.

OUR VISION

If we achieve our mission, then we will have encouraged the development of a consumer finance marketplace

- where customers can see prices and risks up front and where they can easily make product comparisons;
- in which no one can build a business model around unfair, deceptive, or abusive practices;
- that works for American consumers, responsible providers, and the economy as a whole.

Civil Penalty Funds Collected in FY 2014

TABLE 16: FY 2014 CIVIL PENALTY FUND DEPOSITS

Defendant Name	CMP Collected	Collection Date
Washington Federal	$34,000	October 11, 2013
Mortgage Master, Inc.	$425,000	October 15, 2013
Castle & Cooke Mortgage, LLC	$4,000,000	November 13, 2013
Cash America International, Inc.	$5,000,000	November 25, 2013
Meracord LLC	$555,000[86]	November 26, 2013
Republic Mortgage Insurance Company	$100,000	December 5, 2013
American Express Bank, FSB	$2,000,000	December 23, 2013
American Express Centurion Bank	$3,600,000	December 23, 2013
American Express Travel Related Services Company, Inc.	$4,000,000	December 23, 2013
Ally	$18,000,000	December 30, 2013
Fidelity Mortgage Corporation	$54,000	January 21, 2014
1st Alliance Lending, LLC	$83,000	March 5, 2014
Total	**$37,851,000**	

86 Meracord agreed to pay $1.38 million in civil penalties according to a four-year payment schedule.

In the first quarter of FY 2014, the CFPB collected a total of $37.7 million in civil penalties from 10 defendants. In the second quarter of FY 2014, the CFPB collected a total of $137,000 in civil penalties from two defendants.

Civil Penalty Funds Collected in FY 2013

TABLE 17: FY 2013 CIVIL PENALTY FUND DEPOSITS

Defendant Name	CMP Collected	Collection Date
American Express Centurion Bank	$3,900,000	October 1, 2012
American Express Bank, FSB	$1,200,000	October 1, 2012
American Express Travel	$9,000,000	October 1, 2012
Payday Loan Debt Solution, Inc.	$5,000	December 28, 2012
Abraham M. Pessar (Gordon, *et al.*)	$1	February 26, 2013
United Guaranty Corporation	$4,500,000	April 11, 2013
Genworth Guaranty Ins. Corp.	$4,500,000	April 15, 2013
Mortgage Guaranty Ins. Corp. (MGIC)	$2,650,000	April 16, 2013
Radian Guaranty Inc.	$3,750,000	April 29, 2013
American Debt Settlement Solutions, Inc.	$15,000	June 12, 2013
JPMorgan Chase	$20,000,000	September 19, 2013
Total	**$49,520,001**	

In the first quarter of FY 2013, the CFPB settled enforcement actions against three American Express subsidiaries and Payday Loan Debt Solution, Inc. The American Express subsidiaries agreed to pay a total of $14.1 million in civil penalties to the CFPB. Payday Loan Debt Solution agreed to pay a total of $5,000 in civil penalties to the CFPB.

NOTE: The court documents will be available at http://justice.gov/opa/opa_mortgage-service.htm.

Department of Justice

FOR IMMEDIATE RELEASE
MONDAY, MARCH 12, 2012
WWW.JUSTICE.GOV

ASG
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$25 BILLION MORTGAGE SERVICING AGREEMENT FILED IN FEDERAL COURT

WASHINGTON – The Justice Department, the Department of Housing and Urban Development (HUD) and 49 state attorneys general announced today the filing of their landmark $25 billion agreement with the nation's five largest mortgage servicers to address mortgage loan servicing and foreclosure abuses.

The federal government and state attorneys general filed in U.S. District Court in the District of Columbia proposed consent judgments with Bank of America Corporation, J.P. Morgan Chase & Co., Wells Fargo & Company, Citigroup Inc. and Ally Financial Inc., to resolve violations of state and federal law.

The unprecedented joint agreement is the largest federal-state civil settlement ever obtained and is the result of extensive investigations by federal agencies, including the Department of Justice, HUD and the HUD Office of the Inspector General (HUD-OIG), and state attorneys general and state banking regulators across the country.

The consent judgments provide the details of the servicers' financial obligations under the agreement, which include payments to foreclosed borrowers and more than $20 billion in consumer relief; new standards the servicers will be required to implement regarding mortgage loan servicing and foreclosure practices; and the oversight and enforcement authorities of the independent settlement monitor, Joseph A. Smith Jr.

The consent judgments require the servicers to collectively dedicate $20 billion toward various forms of financial relief to homeowners, including: reducing the principal on loans for borrowers who are delinquent or at imminent risk of default and owe more on their mortgages than their homes are worth; refinancing loans for borrowers who are current on their mortgages but who owe more on their mortgage than their homes are worth; forbearance of principal for unemployed borrowers; anti-blight provisions; short sales; transitional assistance; and benefits for service members.

The consent judgments' consumer relief requirements include varying amounts of partial credit the servicers will receive for every dollar spent on the required relief activities. Because servicers will receive only partial credit for many of the relief activities, the agreement will result in benefits to borrowers in excess of $20 billion. The servicers are required to complete 75 percent of their consumer relief obligations within two years and 100 percent within three years.

In addition to the $20 billion in financial relief for borrowers, the consent judgments require the servicers to pay $5 billion in cash to the federal and state governments. Approximately $1.5 billion of this payment will be used to establish a Borrower Payment Fund to provide cash payments to borrowers whose homes were sold or taken in foreclosure between Jan. 1, 2008, and Dec. 31, 2011, and who meet other criteria.

The court documents filed today also provide detailed new servicing standards that the mortgage servicers will be required to implement. These standards will prevent foreclosure abuses of the past, such as robo-signing, improper documentation and lost paperwork, and create new consumer protections. The new standards provide for strict oversight of foreclosure processing, including third-party vendors, and new requirements to undertake pre-filing reviews of certain documents filed in bankruptcy court. The new servicing standards make foreclosure a last resort by requiring servicers to evaluate homeowners for other loss mitigation options first. Servicers will be restricted from foreclosing while the homeowner is being considered for a loan modification. The new standards also include procedures and timelines for reviewing loan modification applications and give homeowners the right to appeal denials. Servicers will also be required to create a single point of contact for borrowers seeking information about their loans and maintain adequate staff to handle calls.

The consent judgments provide enhanced protections for service members that go beyond those required by the Servicemembers Civil Relief Act (SCRA). In addition, the servicers have agreed to conduct a full review, overseen by the Justice Department's Civil Rights Division, to determine whether any service members were foreclosed or improperly charged interest in excess of 6 percent on their mortgage in violation of SCRA.

The oversight and enforcement authorities of the settlement's independent monitor are detailed in the court documents filed today. The monitor will oversee implementation of the servicing standards and consumer relief activities required by the agreement and publish regular public reports that identify any quarter in which a servicer fell short of the standards imposed in the settlement. The consent judgments require servicers to remediate any harm to borrowers that are identified in quarterly reviews overseen by the monitor and, in some instances, conduct full look-backs to identify any additional borrowers who may have been harmed. If a servicer violates the requirements of the consent judgment it will be subject to penalties of up to $1 million per violation or up to $5 million for certain repeat violations.

The consent judgments filed today resolve certain violations of civil law based on mortgage loan servicing activities. The agreement does not prevent state and federal authorities from pursuing criminal enforcement actions related to this or other conduct by the servicers. The agreement does not prevent the government from punishing wrongful securitization conduct that will be the focus of the new Residential Mortgage-Backed Securities Working Group. In the servicing agreement, the United States also retains its full authority to recover losses and penalties caused to the federal government when a bank failed to satisfy underwriting standards on a government-insured or government-guaranteed loan; the United States also resolved certain Federal Housing Administration (FHA) origination claims with Bank of America as part of this filing and with Citibank in a separate matter. The agreement does not prevent any action by individual borrowers who wish to bring their own lawsuits. State attorneys general also preserved, among other things, all claims against the Mortgage Electronic Registration Systems (MERS), and all claims brought by borrowers.

Investigations were conducted by the U.S. Trustee Program of the Department of Justice, HUD-OIG, HUD's FHA, state attorneys general offices and state banking regulators from throughout the country, the U.S. Attorney's Office for the Eastern District of New York, the U.S. Attorney's Office for the District of Colorado, the Justice Department's Civil Division, the U.S. Attorney's Office for the Western District of North Carolina, the U.S. Attorney's Office for the District of South Carolina, the U.S. Attorney's Office for the Southern District of New York, the Special Inspector General for the Troubled Asset Relief Program and the Federal Housing Finance Agency-Office of the Inspector General. The Department of the Treasury, the Federal Trade Commission, the Consumer Financial Protection Bureau, the Justice Department's Civil Rights Division, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, the Department of Veterans Affairs and the U.S. Department of Agriculture made critical contributions.

For more information about the mortgage servicing settlement, go to www.NationalMortgageSettlement.com. To find your state attorney general's website, go to www.NAAG.org and click on "The Attorneys General."

The joint federal-state agreement is part of enforcement efforts by President Barack Obama's Financial Fraud Enforcement Task Force. President Obama established the interagency Financial Fraud Enforcement Task Force to wage an aggressive, coordinated and proactive effort to investigate and prosecute financial crimes. The task force includes representatives from a broad range of federal agencies, regulatory authorities, inspectors general and state and local law enforcement who, working together, bring to bear a powerful array of criminal and civil enforcement resources. The task force is working to improve efforts across the federal executive branch, and with state and local partners, to investigate and prosecute significant financial crimes, ensure just and effective punishment for those who perpetrate financial crimes, combat discrimination in the lending and financial markets, and recover proceeds for victims of financial crimes. For more information about the task force visit: www.stopfraud.gov.

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State Consumer Relief Information
New Mexico, Program to Date

	RESCAP PARTIES			BANK OF AMERICA			CITI			CHASE			WELLS			TOTAL CONSUMER RELIEF - ALL SERVICERS		
	Aggregate Amount of Relief/ Benefit	No. of Borrowers	Average Amount of Relief/ Benefit	Aggregate Amount of Relief/ Benefit	No. of Borrowers	Average Amount of Relief/ Benefit	Aggregate Amount of Relief/ Benefit	No. of Borrowers	Average Amount of Relief/ Benefit	Aggregate Amount of Relief/ Benefit	No. of Borrowers	Average Amount of Relief/ Benefit	Aggregate Amount of Relief/ Benefit	No. of Borrowers	Average Amount of Relief/ Benefit	Aggregate Amount of Relief/ Benefit	No. of Borrowers	Average Amount of Relief/ Benefit
CONSUMER RELIEF																		
Completed 1st Lien Modification Forgiveness [1]	$154,500	2	$77,250	$6,836,386	102	$67,023	$749,918	14	$53,566	$1,578,039	39	$40,463	$1,633,002	46	$35,500	$10,951,845	203	$53,950
Completed Forgiveness of pre 3/1/2012 Forbearance [2]				$718,868	33	$21,784	$191,743	6	$31,957	$13,100	1	$13,100	$105,508	9	$11,723	$1,029,219	49	$21,004
Completed 2nd Lien Modification Forgiveness [3]	$47,000	2	$23,500	$18,428	1	$18,428	$325,586	21	$15,504	$9,335	1	$9,335	$13,804	4	$3,451	$414,153	29	$14,281
Completed 2nd Lien Extinguishments [4]	$818,110	14	$58,436	$25,961,554	577	$44,994	$4,122,247	77	$53,536	$2,856,736	48	$59,515	$3,566,971	97	$36,773	$37,325,618	813	$45,911
Short Sales Completed/ Deficiency Forgiven [5]	$451,674	9	$50,186	$24,237,910	362	$66,956	$744,329	11	$67,666	$7,386,22?	120	$61,552	$3,868,238	63	$61,401	$36,688,372	565	$64,935
Deeds in Lieu Completed/ Deficiency Forgiven [6]																		
Enhanced Borrower Transitional Funds Paid by Servicer (excess of $1,500) [7]				$800,683	91	$8,799	$15,000	1	$15,000	$583,000	31	$18,806	$26,050	9	$2,894	$1,424,733	132	$10,793
Servicer Payments to Unrelated 2nd Lien Holder for Release of 2nd Lien [8]							$9,325	1	$9,325	$10,400	2	$5,200	$13,000	1	$13,000	$32,725	4	$8,181
Forbearance for Unemployed Borrowers [9]																		
Deficiency Waivers [10]																		
Forgiveness of Principal Associated with a Property When No Foreclosure [11]							$84,326	3	$28,109							$84,326	3	$28,109
Cash Costs Paid by Servicer for Demolition of Property [12]																		
REO Properties Donated [13]													$32,661	1	$32,661	$32,661	1	$32,661
Refinances Completed - Estimated Consumer Relief [14]	$259,433	5	$51,887	$5,721,237	174	$32,881	$961,573	32	$30,049	$305,293	10	$30,529	$8,370,360	190	$44,055	$15,617,896	411	$38,000
Total Consumer Relief	**$1,730,717**	**32**	**$54,085**	**$64,295,066**	**1,340**	**$47,981**	**$7,204,047**	**166**	**$43,398**	**$12,742,124**	**252**	**$50,564**	**$17,629,594**	**420**	**$41,975**	**$103,601,548**	**2,210**	**$46,879**
CONSUMER RELIEF - IN PROCESS																		
1st Lien Modification Trials Offered/Approved [15]				$11,051,289	147	$75,179	$690,647	13	$53,127	$2,927,746	64	$45,746	$3,454,155	98	$35,246	$18,123,837	322	$56,285
1st Lien Modification Trials Started/In Process [16]				$10,045,908	137	$73,328	$694,081	13	$53,391	$2,438,799	58	$42,048	$1,994,471	48	$41,551	$15,173,259	256	$59,271
TOTAL CONSUMER RELIEF - ALL SERVICERS $103,601,548																		

NOTES:
- Any differences in adding are due to rounding.

DEFINITIONS:

[1] Completed 1st Lien Modification Forgiveness represents finalized first lien principal reduction permanent modifications (including converted trial modifications).
[2] Completed Forgiveness of pre 3/1/2012 Forbearance represents forgiveness of deferred principal from pre-settlement permanent modification of first lien mortgages. This line is distinct from Completed 1st Lien Modification Forgiveness line item.
[3] Completed 2nd Lien Modification Forgiveness represents finalized second lien principal reduction permanent modifications. Chase amended its Schedule Y amounts from March 1, 2012 through Dec. 31, 2012 as a result of its decision to no longer seek credit for 478 previously submitted second lien loans. As a result, it reports a reduction in its program to date numbers of $6.6 million.
[4] Completed 2nd Lien Extinguishments represents finalized second lien mortgage extinguishments (forgiveness of the entire balance and release of lien).
[5] Short Sales Completed/Deficiency Forgiven represents the forgiveness of first or second lien mortgage remaining balances to facilitate short sale transactions and release of liens.
[6] Deeds in Lieu Completed/Deficiency Forgiven represents the forgiveness of first or second lien mortgage remaining balances to facilitate transactions in which borrower deeds the residence to Servicer/investor in lieu of foreclosure and release of liens.
[7] Enhanced Borrower Transitional Funds Paid by Servicer represents transitional funds in an amount greater than $1,500 provided to homeowners to facilitate completion of short sales or deeds in lieu of foreclosure.
[8] Servicer Payments to Unrelated 2nd Lien Holder for Release of 2nd Lien represents payments to unrelated second lien holders for release of second lien mortgages in connection with short sale or deeds-in-lieu transactions.
[9] Forbearance for Unemployed Borrowers represents forgiveness of payment arrearages on behalf of unemployed borrowers or traditional forbearance programs for unemployed borrowers to keep them in their homes until they can resume payments.
[10] Deficiency Waivers represents waiver of valid claims on borrower deficiency balances on first or second lien mortgages and release of liens.
[11] Forgiveness of Principal Associated with a Property When No Foreclosure represents forgiveness of principal associated with a property and release of liens in connection with a decision not to pursue foreclosure.
[12] Cash Costs Paid by Servicer for Demolition of Property represents payments to demolish properties to prevent blight.
[13] REO Properties Donated represents properties owned by Servicers/investors that are donated to municipalities, nonprofits, disabled servicemembers, or families of deceased servicemembers.
[14] Refinances Completed represents eligible loans refinanced with reduced rates. The estimated benefit to borrowers from refinancing is the estimated annual benefit multiplied by 7.85, which represents the Servicers' weighted multiplier under the Settlement per Exhibit D 9.e.ii, and is consistent with what some of the Servicers are reporting in their filings with the U.S. Securities and Exchange Commission. The estimated annual benefit to borrowers is the product of the average annual interest rate reduction, the average unpaid principal loan balance, and the number of borrowers. See below for information on Refinance Solicitations/Offers/Approvals and Refinances Completed by each Servicer.

	RESCAP PARTIES			BANK OF AMERICA			CITI			CHASE			WELLS			TOTALS - ALL SERVICERS		
	Average Loan Balance	No. of Borrowers	Average Rate Reduction	Average Loan Balance	No. of Borrowers	Average Rate Reduction	Average Loan Balance	No. of Borrowers	Average Rate Reduction	Average Loan Balance	No. of Borrowers	Average Rate Reduction	Average Loan Balance	No. of Borrowers	Average Rate Reduction	Average Loan Balance	No. of Borrowers	Average Rate Reduction
Refinance Solicitations/Offers/ Approvals*	$415,770	11		$174,731	446		$127,684	65		$162,998	12		$151,806	458		$163,595	992	
Refinances Completed	$220,325	5	3.00%	$193,024	174	2.17%	$113,252	32	3.38%	$149,580	10	2.60%	$164,576	190	3.41%	$172,937	411	7.80%

* Refinance Solicitations/Offers/Approvals represents the first lien mortgages considered for refinancing where loan to value exceeds 80% and would not qualify for Servicer's generally available refinancing program as of 9/30/11. This includes mandatory solicitation borrowers under 9.a. of Exhibit D.

[15] 1st Lien Modification Trials Offered/Approved represents all first lien mortgages where trial modification offers were made to the borrower.
[16] 1st Lien Modification Trials Started/In Process represents all first lien mortgages for which any payment had been made in a trial modification after March 1, 2012. Trial may have been Offered/Approved in current or past quarter.

NMAGO NEWS RELEASE
Attorney General Gary K. King
Friday, August 1, 2014
CONTACT: Phil Sisneros 505-222-9174, Lynn Southard 505-222-9048

$8 Million in Relief Possible for Some NM Homeowners

AG King: Eligible Recipients Must Apply or Risk Losing Out

Settlement with Ocwen Mortgage Co. Over Illegal Foreclosure Practices

(ALBUQUERQUE)---Attorney General Gary King urges eligible New Mexicans to apply for monetary relief and direct payments from a national settlement with the largest non-bank mortgage servicer in the country.

"Affected homeowners need to find out if they qualify for direct payments or a principal reduction of their mortgage loan," says Attorney General King, whose office participated in the recent settlement on behalf of New Mexico consumers. "If you had a mortgage loan with Ocwen, Homeward Residential Holdings or Litton Loan Servicing and lost the home to foreclosure between 1/1/09 and 12/1/12, you may be eligible, however, you must file a claim by September 15, 2014." adds the AG.

Additionally, if homeowners currently have a loan serviced by Ocwen or the other named companies, and the home is worth less than what is still owed on the mortgage, they may be eligible for a principal reduction of the loan. AG King says the homeowners or their lawyers/counselors can contact Ocwen and their subsidiaries directly and ask if they are eligible. They can also contact the servicer at **1-800-337-6695** or email them at: **ConsumerRelief@Ocwen.com**. The NM Attorney General's Office may also be contacted for more information at: 505-222-9038.

Monetary relief for homeowners- Nationally - 2 billion dollars in first lien principal reductions and more than $125 million in cash payments to homeowners who lost their home to foreclosure. For New Mexico homeowners that will means the potential of approximately $8 million in relief and direct payments.

Ocwen, a publicly traded Florida corporation headquartered in Atlanta, Ga., is the largest non-bank mortgage servicer and the fourth-largest servicer overall in the United States. As a mortgage servicer, it is responsible for collecting payments from the mortgage borrower and forwarding those payments to the owner of the loan. It handles customer service, collections, loan modifications, and foreclosures.

Federal and state agencies involved in the settlement believe that Ocwen was engaged in significant and systemic misconduct that occurred at every stage of the mortgage servicing process. It was alleged that they:

- Took advantage of homeowners with servicing shortcuts and unauthorized fees;
- Deceived consumers about foreclosure alternatives and improperly denied loan modifications; and
- Engaged in illegal foreclosure practices.

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