

# SUMMARY OF REGULATION C VIOLATION

## 1999-2015 HMDA-LAR Public Raw Data Disclosures - JPMorgan Chase and Company Subsidiaries, Affiliate Institutions, and Chase Joint Venture Partnerships.

*(Multi-Colored, Highlighted Cells Show HMDA-CRA Regulation C, and Possible FRB-Regulation W, Section 23A Violations.)*

Year	HMDA-LAR Respondent and HMDA Supervisory Agency Information			Source: JPMorgan Bank, N. A., Subsidiaries, and Affiliates' HMDA-LAR Public Raw Data Disclosures: ✓ 1999-2012 HMDA-LAR Disclosures - National Archives and Records Administration (NARA), ✓ 2013-2015 HMDA-LAR Disclosures - CFPB HMDA "Exploring the Data Website".					
	HMDA-LAR Financial Institution/ Respondent Number.	HMDA-LAR Financial Institution/ Respondent Name.	Supervisory Agency <sup>1</sup> and Percentage of Quality Edit Failure Errors in Disclosure. (Max. 10% Allowable.)	Conventional Mortgage Applications Received.	Number & (Percent) of Loans Originated at Subprime Rates. <sup>2</sup>	FHA, VA, and FSA-RHS Mortgage Applications Received.	Number of Mortgage Applications Purchased <sup>3</sup>	Number of Loans Sold and Purchaser Codes (Loans Sold to GSEs, Ginnie Mae, Private Securitization, Affiliate Institutions <sup>4</sup> , and Others.)	Number of Loans not Originated or not Sold in Calendar Year.
1999	22-1092200	Chase Manhattan Mortgage Corporation (CMMC) (NJ) <sup>1</sup>	OCC (1.6%)	202725	Rate Spread Not Captured in HMDA-LAR	40891	131920	Loans Sold: 272663 Sold to: ①②③⑤⑥⑧⑨	26951 ⑩
	0000852218 <sup>II</sup>	Chase Manhattan Bank (NY)	FRB (10.2%)	26445	Rate Spread Not Captured in HMDA-LAR	671	613	None	None
	0000023160	Chase Manhattan Bank USA, N. A. (DE)	OCC (56.1 Edit Errors.)	166503	Rate Spread Not Captured in HMDA-LAR	2	4071	None	None

<sup>1</sup> The HMDA Supervisory Agencies - OCC, FRB, HUD, FIDIC, and CFPB - are required by Regulation C and the 2004 Frank-Dodd Act to verify and approved correctness, validity, and quality of annual HMDA-LAR Public Disclosure from the respondents for which they have HMDA supervisory authority.

<sup>2</sup> Rate Spreads of originated home mortgage loans were not required in HMDA-LAR submissions until 2004.

<sup>3</sup> HMDA-LAR Public Disclosures do not identify from whom these loans are purchased, however, in the case of JPM, these loans were likely purchased from affiliate institutions such as subsidiaries, JVPs, and LLCs/LPs.

<sup>4</sup> HMDA-LAR Public Disclosures do not identify the Affiliate Institutions to which originated loans are sold, but the like purchasers are JPM subsidiaries within servicing and securitization capabilities such as Chase Home Finance, LLC, and/or JP Mortgage. (List of Mortgage Loan Purchaser Codes can be found on final page of this document.)

2000	22-1092200	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	OCC (1.7%)	148538	Rate Spread Not Captured in HMDA-LAR	31896	101483	Loans Sold: 198100 Sold to: ①②③⑤⑥⑦⑧⑨	83617 ①
	0000852218	Chase Manhattan Bank (NY)	FRB (12.3%)	20752	Rate Spread Not Captured in HMDA-LAR	549	211	None	None
	0000023160	Chase Manhattan Bank USA, N. A. (DE)	OCC (49.6% Edit Errors.)	159620	Rate Spread Not Captured in HMDA-LAR	0	16549	None	None
2001	22-1092200	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	OCC (0.5%)	322609	Rate Spread Not Captured in HMDA-LAR	66822	147523	Loans Sold: 371199 Sold to: ①②③⑤⑥⑦⑧⑨	165755 ①
	0000852218	JPMorgan Chase Bank (NY)	FRB (12.7%)	62377	Rate Spread Not Captured in HMDA-LAR	1213	181	None	None
	0000023160	Chase Manhattan Bank USA, N. A. (DE)	OCC (72.2% Edit Errors.)	586540	Rate Spread Not Captured in HMDA-LAR (HUD-SP List)	0	19601	None	None
2002	0001612400 <sup>5</sup>	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	FRB (1.2%)	440907	Rate Spread Not Captured in HMDA-LAR	67793	161455	Loans Sold: 283783 Sold to: ①②⑤⑥⑧⑨	232218 ①
	0000852218	JPMorgan Chase Bank (NY)	FRB (10.6%)	50808	Rate Spread Not Captured in HMDA-LAR	1368	32	None	None
	0000023160	Chase Manhattan Bank	OCC (67.6% Edit Errors.)	239506	Rate Spread Not Captured in	0	4760	None	None

<sup>5</sup> Acquired by JPMorgan Chase Bank (NY) and assigned Respondent ID: 0001612400; Supervisory Agency FRB

		USA, N. A. (DE)			HMDA-LAR (HUD-SP List)				
2003	0001612400	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	FRB (1.2%)	672980	Rate Spread Not Captured in HMDA-LAR	83720	291874	Loans Sold: 793528 Sold to: ①②⑤⑥⑧⑨	255046 ⑩
	0000852218	JPMorgan Chase Bank (NY)	FRB (12.9%)	62320	Rate Spread Not Captured in HMDA-LAR	2010	173	None	None
	0000023160	Chase Manhattan Bank USA, N. A. (DE)	OCC (66.6% Edit Errors.)	159044	Rate Spread Not Captured in HMDA-LAR	0	2574	None	None
	0000000008	Bank One, N. A. (IL) <sup>6</sup>	OCC (30.9% Edit Errors.)	1716	Rate Spread Not Captured in HMDA-LAR	0	0	None	None
	0000007621	Bank One, N. A. (OH)	OCC (26.8% Edit Errors.)	481371	Rate Spread Not Captured in HMDA-LAR	4383	7224	Loans Sold 28004 Sold to: ①②⑤⑧⑦	None
2004	22-1092200 <sup>8</sup>	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	OCC (5.5%)	411975	8853 (2.2%)	45977	174513	Loans Sold: 402991 Sold to: ①②⑧⑨	229774 ⑩

<sup>6</sup> The 2003 Bank One HMDA-LAR Disclosures are being shown here as informational only. The merger between JPM and Bank One was not finalized until July 2004, but given that 1,035,885 conventional mortgage loan applications were received by Bank One in 2003, and only 271,480 conventional loan applications received during the 2004, it appears that none of Bank One's 2004 conventional applications, received prior to the merger were submitted via HMDA-LAR.

<sup>7</sup> In 2003, Bank One N. A. (OH) sold 28,004 mortgage loans to GSEs, commercial banks, affiliate institutions, and others.

<sup>8</sup> Subsidiary of newly-formed JPMorgan Chase Bank, National Association. Assigned Respondent ID:22-1092200; Supervisory Agency: OCC.

	0000000008 <sup>9</sup>	JPMorgan Chase Bank, N. A. (OH) <sup>10 1112 13</sup>	OCC (32.1% Edit Errors.)	271480 <sup>14</sup>	8813 (8.8%)	3381	100466	Loans Sold: 133814 Sold to: ①③⑥⑦⑧⑨	241512 ①
	0000023160 <sup>15</sup>	Chase Manhattan Bank USA, N. A. (DE) <sup>16</sup>	OCC (69.4% Edit Errors.)	97136	10283 (36.5% Subprime)	Only 7 FHA and VA Loans	6348	22.5% of 13722 Originated Loans Sold to: ⑧ (Note1)	89092 ①
	0000000008 (1/1/2004-6/30/2004)	Bank One, N. A. (IL) <sup>17</sup>	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)
	0000007621 (1/1/2004-6/30/2004)	Bank One, N. A. (OH) (aka: Bank One (DE))	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)
2005	22-1092200 <sup>18</sup>	Chase Manhattan Mortgage Corporation (CMMC) (NJ) <sup>III</sup> and Chase Home Finance, LLC.	No LAR Filed.)	None??? (CMMC had more than 45 thousand Conventional Applications in 2004.)	No LAR Submitted; but in 2006, listed by Bloomberg as Nation's 12 <sup>th</sup> largest Alt-A & Subprime Len)	None??? (CMMC had more than 41 thousand FHA/VA/FSA Applications in 2004.)	N/A	None	

<sup>9</sup> Institution/Respondent ID: 0000000008-1 was originally assigned to Bank One (IL), and had been used for all LAR submissions from this bank between 1999 and 2003. JPMorgan Chase Bank, N. A. was the surviving entity of this merger and per Regulation C, should have either continued to use Respondent ID 0000852218, or should have been assigned a new Respondent Institution ID..

<sup>10</sup> Granted National Association (NA) Bank status by OCC on July 2004.

<sup>11</sup> Acquired Bank One, National Association (IL), and Bank One, National Association (OH) July 1, 2004.

<sup>12</sup> Assumed HMDA Respondent ID: 0000000008-1 which previously was assigned to Bank One, NA (IL) 1999-2003.

<sup>13</sup> Acquired CMMC Origination and Servicing Rights via its ownership of Chase Home Finance, LLC.

<sup>14</sup> JPMorgan Chase Bank (NY) acquired Bank One in July 2004, and Bank One, N. A. (IL) submitted HMDA-LAR disclosures that included 1,035,885 conventional loan applications and 15,191 FHA/VA/FSA-RHS Applications; however, JPMorgan Chase Bank, N. A. 's 2004 HMDA-LAR disclosures, (which by law as the successor of the merger) should have also included Bank One, N. A. (OH)'s conventional loan applications received prior to the July 1, 2004 merger) was only 271,480 conventional home mortgage loan applications and 3381 FHA/VA/FSA-RHS home mortgage loan applications.

<sup>15</sup> All HMDA-LAR Public Disclosures for Respondent ID 0000023160 were submitted between 2004 through 2007 were submitted for the wrong JPMorgan Chase Institution. They were submitted and recorded under Respondent Institution: Chase Manhattan Bank USA, N. A. but should have been submitted for Chase Community and Consumer-Direct Banking. (No Respondent ID for Chase Community and Consumer-Direct Banking this was found in the HMDA-LAR database.)

<sup>16</sup> Merged with Bank One, National Association (OH), July 1, 2004.

<sup>17</sup> The 2003 Bank One HMDA-LAR Disclosures are being shown here as informational only. The merger between JPM and Bank One was not finalized until July 2004, but given that 492,491 conventional mortgage loan applications were received by Bank One (IL) in 2003, and only 271,480 conventional loan applications received during the 2004, it appears that none of Bank One's 2004 conventional applications, received prior to the July 1, 2004 merger were submitted via HMDA-LAR.

<sup>18</sup> As of January 1, 2005, Manhattan Mortgage Corporation was acquired by Chase Home Finance, LLC. Chase Manhattan Mortgage Corporation (CMMC), a subsidiary of JPMorgan Chase Bank, National Association, engages in the origination, purchase, servicing, and securitization of mortgages in the United States. It offers residential mortgage loans, as well as housing loans.

	0000000008	JPMorgan Chase Bank, N. A. (OH)	<i>OCC (34.8% Edit Errors)</i>	558066	14744 (4.2%)	26528	147692	Loans Sold: 401193 ①③⑧⑨	331092 ①
	0000023160	Chase Manhattan Bank USA, N. A. (DE) <sup>19 16</sup>	<i>OCC (85.3% Edit Errors.)</i>	116344 <sup>20</sup>	32637 (69.2% Subprime)	0	0	99.3% of 46857 Originated Loans Sold to: ⑧ (Note1)	69487 ①
		Chase Bank USA, N. A. (DE) <sup>21</sup>	<i>OCC (N/A)</i>	0	No LAR Disclosures Submitted	0		None	None
	0000000008	JPMorgan Chase Bank, N. A. (OH)	OCC (32.4%)	529086	24691 (7.8%)	22831	204632	Loans Sold: 388213 Sold to: ①②③⑧⑨	368337 ①
2006	0000023160	Chase Manhattan Bank USA, N. A. (DE)	<i>OCC (88.9% Edit Errors.)</i>	127532	51673 (89.4% Subprime)	0	0	99.1% of 57260 Originated Loans Sold to: ⑧ (Note1)	70272 ①
		Chase Bank USA, N. A. (DE)	OCC (N/A)	0	No LAR Filed. Disclosures Submitted	0	0	None	None
	0000000008	JPMorgan Chase Bank, N. A. (OH)	<i>OCC (31.1% Edit Errors.)</i>	498923	32282 (10.8%)	28575	236704	Loans Sold: 411149 Sold to: ③⑥⑧⑨	377629 ①
2007	0000023160	Chase Manhattan Bank USA, N. A. (DE)	<i>OCC (87.7% Edit Errors.)</i>	144649	55825 (95.8% Subprime)	0	0	99.4% of 57881 Originated Loans Sold: ⑧ (Note1)	86768 ①
		Chase Bank USA, N. A. (DE)	OCC (N/A)	0	No LAR Disclosures Submitted		0	None	None

<sup>19</sup> 2005 HMDA-LAR data submitted under wrong name; this bank's name was changed to Chase Bank USA, NA on March 1, 2005, and HMDA-LAR submissions for 2005, 2006, 2007, 2008 are shown under the name of Chase Manhattan Bank USA, NA, which no longer existed 2004. This is a violation of Regulation C, and this should have been detected by OCC, the bank's Supervisory Agency.

<sup>20</sup> 16875 of these mortgage loan applications appear to have been surreptitiously transferred to Chase Manhattan Bank USA, N. A. from some other JPMorgan affiliate institution (e. g., Chase Home Finance, LLC. or Chase Manhattan Mortgage Corporation (CMMC).

<sup>21</sup> Transmittal Sheets from NARA Database contains no records for Chase Bank USA, NA which is the responded name that should have been assigned to HMDA Financial Institution Identification Number. Bank

	0000008551	Washington Mutual Bank (NV) <sup>22</sup>	OTS (21.6%)	643765	54914 (21.0%)	0	163283	Loans Sold: 28403 Sold to ①③⑤⑥⑦⑨	223073 ①
	2276200003	Bear Stearns Residential Mortgage (AZ) <sup>23</sup>	OTS (20.8%)	67905	15696 (64.9%)	3	1924	Loans Sold: 21205 Sold to ②	2986 ①
2008	0000008551 1/1/2008 thru 7/1/2008) <sup>24</sup>	Washington Mutual Bank (NV) <sup>25</sup> (9/2008)	(No LAR Filed BY JPMorgan.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)
	2276200003 1/1/2008 thru 7/1/2008) <sup>26</sup>	Bear Stearns Residential Mortgage (AZ) <sup>27</sup> (9/2008)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)	(No LAR Filed.)
	0000000008	JPMorgan Chase Bank, N. A. (OH)	OCC (12.5%)	434300	7406 (2.9%)	111666	708639	Loans Sold: 565484 Sold to: ①⑤⑧	608831 ①
	0000023160	Chase Manhattan Bank USA, N. A. (DE)	(85.3% Edit Errors.)	14014	3970 (96.3% Subprime)	0	0	100% of 4122 Originated Loans Sold to: ③ (Note1)	9892 ①
Chase Bank USA, N. A. (DE)		OCC (N/A)	0	No LAR Disclosures Submitted	0	0	None	None	

<sup>22</sup> The 2007 Washington Mutual Bank HMDA-LAR Public Disclosures are being shown here as informational only. JPMorgan Chase Bank acquired Washington Mutual Bank in September 2008. However, the high percentage of (21.0%) mortgages originated at Rate Spread rates, is an area of concern.

<sup>23</sup> The 2007 Bear Stearns Residential Mortgage HMDA-LAR Public Disclosures are being shown here as informational only. JPMorgan Chase Bank acquired Bear Stearns Residential Mortgage in September 2008. More than sixty-four percent of Bear Stearns conventional mortgages were originated at rate spread interest rates.

<sup>24</sup> No HMDA-LAR Public Disclosures Submitted by JPMorgan Chase Bank for applications originated prior to the July 1, 2008 acquisition of Washington Mutual bank.

<sup>25</sup> The 2007 Washington Mutual Bank HMDA-LAR Public Disclosures are being shown here as informational only. JPMorgan Chase Bank acquired Washington Mutual Bank in September 2008. However, the high percentage of (21.0%) mortgages originated at Rate Spread rates, is an area of concern.

<sup>26</sup> No HMDA-LAR Public Disclosures Submitted by JPMorgan Chase Bank for applications originated prior to the July 1, 2008 acquisition of Bear Stearns Residential. (All mortgage loans originated for Bear Stearns Loan should be included in JPMorgan Chase Bank' purchased loan for 2008.)

<sup>27</sup> The 2007 Bear Stearns Residential Mortgage HMDA-LAR Public Disclosures are being shown here as informational only. JPMorgan Chase Bank acquired Bear Stearns Residential Mortgage in September 2008. More than sixty-four percent of Bear Stearns conventional mortgages were originated at rate spread interest rates. <sup>27</sup> No HMDA-LAR Public Disclosures Submitted by JPMorgan Chase Bank for applications originated prior to the July 1, 2008 acquisition of Bear Stearns Residential. (All mortgage loans originated for Washington Mutual Loan should be include in JPMorgan Chase Bank' purchased loan for 2008.)

2009	0000000008	JPMorgan Chase Bank, N. A. (OH)	OCC (11.7%)	365298	7568 (3.6%)	101774	437927	Loans Sold: 644833 Sold to: ①③⑥⑧⑨	260165 ①
2010	0000000008	JPMorgan Chase Bank, N. A. (OH)	(20.4% Edit Errors.)	472287	657 (0.2%)	75838	380375	Loans Sold: 687826 Sold to: ①③⑥⑦⑧⑨	240874 ①
2011	0000852218 <sup>IV</sup>	JPMorgan Chase Bank, N. A. (OH)	(31.1% Edit Errors.)	643571	6456 (1.5%)	56369	300092	Loans Sold: 663466 Sold to: ①③⑥⑧⑨	336566 ①
2012	0000852218	JPMorgan Chase Bank, N. A. (OH)	(15.9% Edit Errors.)	639150	10436 (2.4%)	65330	344095	Loans Sold: 801980 Sold to: ①③⑥⑧⑨	418651 ①
2013	0000852218	JPMorgan Chase Bank, N. A. (OH)	CFPB (15.0% Edit Errors.)	531925	10413 (2.9%)	92590	424060	Loans Sold: 719131 Sold to: ①③⑤⑥⑧⑨	329444 ①
2014	0000852218	JPMorgan Chase Bank, N. A. (OH)	CFPB (9.9%)	198665	2615 (2.0%)	24801	218333	Loans Sold: 229091 Sold to: ①③⑤⑥⑧⑨	220700 ①
2015	0000852218	JPMorgan Chase Bank, N. A. (OH)	CFPB (9.7%)	366860	2355 (0.6%)	94187	212216	Loans Sold: 366860 Sold to: ①③⑤⑥⑧⑨	51870 ①

**Totals - Applications, Originated Loans, Subprime Loans, Purchased Loans, and Sold Loans:**

1. Total Home Mortgage Loan Applications Received-----	12,584,279
a. Conventional Mortgage Applications Received -----	11,522,306
b. FHA, VA, and FSA-RHS Mortgage Applications Received -----	1,061,973
2. Rate Spread/Subprime Loans Originated -----	347,541
3. Number of Home Mortgage Loans Purchased -----	4,988,209
4. Number of Home Mortgage Loans Sold to ①②④③⑤⑥⑦⑧⑨ -----	8,515,146
5. Loans was not originated or was not sold in the calendar year ⑩ -----	3,603,072

**Mortgage Loans Purchaser Codes:**

- ⑩ - Loan was not originated or was not sold in the calendar year.
- ① - Fannie Mae.
- ② - Ginnie Mae.
- ③ - Freddie Mac.
- ④ - Farmer Mac.
- ⑤ - Private Securitization.
- ⑥ - Bank, S&L, or Savings Association.
- ⑦ - Insurance Company, Credit Union, Mortgage Bank, or Finance Company.
- ⑧ - Affiliate Institution.
- ⑨ - Other Type Purchaser.



## Chase Joint Venture Partnerships (JVPs) formed between 2006 and 2008

- ❖ Chase JVPs are majority-owned by Chase Ventures Holding, Inc., a wholly-owned subsidiary of JPMorgan Chase Bank, N. A. (Source: Office of the Comptroller of the Currency (OCC) Public Disclosure for CRA Evaluation, Dated: January 1, 2007.)
- ❖ JPMorgan Chase Bank, N. A. is listed as the Parent Company of all JVPs in list, and the registered addresses all JVPs was the same as 194 Wood Avenue South, Iselin, NJ 08830.)
- ❖ All JVPs Registered with HUD as FHA home mortgage loan originators between 2006 and 2008.
- ❖ Conventional and/or FHA home mortgage loans originated by JVPs are not included in HMDA-LAR Public Disclosures for JPMorgan Chase Bank, N. A.

HMDA-LAR Public Raw Data Disclosures for Chase Joint Venture Partnerships (JVPs)												
Years	HMDA Respondent ID	HMDA Respondent Name	Parent Name	Home Mortgage Loan Applications	Home Mortgage Loan Originations by Race						Total Home Mortgage Originations	Home Mortgage Loans Sold to JPMorgan Affiliate
					American Indian or Alaskan Native	Asian	African American	Native Hawaiian or Other Pacific Islander	White	Race Not Available		
2006-2008	26-1602421	ACCENT MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	164	0	0	0	0	46	41	87	83
2006-2008	25-1834994	AMERICAN ACCESS MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	272	0	7	4	0	200	10	221	166
2006-2008	05-0541360	BAILEY MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	287	0	8	1	0	179	1	189	175
2006-2008	31-1805337	BUCKS COUNTY LENDING GROUP LLC	JPMORGAN CHASE BANK, NA	191	0	2	3	1	152	2	160	155
2006-2008	26-2143790	CALIFORNIA PREMIERE LENDING	JPMORGAN CHASE BANK, NA	82	0	5	1	1	53	5	65	59
2006-2008	22-3566214	CAMBRIDGE MORTGAGE SERVICES	JPMORGAN CHASE BANK, NA	896	2	8	12	0	592	16	630	543
2006-2008	20-1961099	CHESCO FINANCIAL SERVICES, LLC	JPMORGAN CHASE BANK, NA	181	0	2	2	0	141	0	145	123
2006-2008	20-5251727	COMMUNITY LIFE MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	356	0	3	5	0	244	24	276	250
2006-2008	20-5965796	DIAMOND LENDING SERVICES LLC	JPMORGAN CHASE BANK, NA	85	1	1	1	1	24	1	29	29
2006-2008	20-0367622	EQUIBUILD MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	270	0	5	3	1	164	37	210	188
2006-2008	36-4524112	JP MORTGAGE LLC	JPMORGAN CHASE BANK, NA	697	2	3	7	0	420	78	510	486
2006-2008	26-0701831	JPE HOME FINANCE LLC	JPMORGAN CHASE BANK, NA	121	0	2	7	1	42	1	53	50
2006-2008	20-2971210	LIFESTYLE MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	29	0	2	1	0	16	4	23	19
2006-2008	26-1602363	MANHATTAN HOME FINANCE, LLC	JPMORGAN CHASE BANK, NA	91	1	0	0	0	59	8	68	55
2006-2008	20-8609407	OCEAN CREST LENDING LLC	JPMORGAN CHASE BANK, NA	106	0	0	0	0	38	11	49	44
2006-2008	26-1777273	ONE HOME MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	84	0	2	2	0	48	23	75	71
2006-2008	20-5424817	PRIMARY HOME FINANCE, LLC	JPMORGAN CHASE BANK, NA	238	1	0	0	0	164	7	172	155
2006-2008	23-3042457	PRIME ONE MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	341	0	4	35	0	228	8	275	231
2006-2008	20-2356201	RESIDENTIAL MORTGAGE GROUP	JPMORGAN CHASE BANK, NA	696	2	15	4	0	537	12	570	491
2006-2008	120-2548042	SIERRA HOME LOANS, LLC	JPMORGAN CHASE BANK, NA	6	0	0	0	0	6	0	6	2
2006-2008	20-2433622	SOUTH CENTRAL MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	244	0	5	1	1	167	10	184	170
2006-2008	20-0017254	TOTAL FINANCIAL SERVICES, LLC	JPMORGAN CHASE BANK, NA	24	0	0	0	0	13	3	16	10
2006-2008	52-2335728	TOWN AND COUNTRY MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	676	0	18	17	0	496	34	565	515
2006-2008	20-4651133	URBAN HOME MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	386	1	24	0	2	165	51	243	243
2006-2008	20-0258466	VALUE MORTGAGE, LLC	JPMORGAN CHASE BANK, NA	287	0	11	8	1	196	8	224	239
2006-2008	20-1961099	CHESCO FINANCIAL SERVICES, LLC	JPMORGAN CHASE BANK, NA	181		2	2		141		145	123
<b>Totals</b>				<b>6991</b>	<b>10</b>	<b>116</b>	<b>106</b>	<b>8</b>	<b>4194</b>	<b>387</b>	<b>5045</b>	<b>4675</b>
<b>Percentage</b>					<b>0.2%</b>	<b>2.3%</b>	<b>2.1%</b>	<b>0.2%</b>	<b>83.1%</b>	<b>7.7%</b>	<b>95.6%</b>	<b>92.7%</b>

Source: HMDA-LAR Public Raw Data Disclosures - National Archives and Records Administration (NARA)

<sup>I</sup> CMMC was created by a Joint Venture between Chase Manhattan Bank and Mellon Bank in 1997.

<sup>II</sup> Institution/Respondent ID: 0000852218-2 assigned to Chase Manhattan Bank of New York which was supervised by FRB.

<sup>III</sup> **SERIOUS REGULATION C VIOLATION:** CMMC was Acquired by Chase Home Finance, LLC in 2005 but no HMDA-LARs submissions were received from either of these entities from 2005, and 2011, when Chase Home Finance, LLC was merged into JPMorgan Chase Bank, N. A.

<sup>IV</sup> Submissions from JPMorgan Chase Bank, N. A. were submitted using Institution/Responded ID: 0000852218-9 and monitored by CFPB, even though this ID was initially assigned to Chase Manhattan Bank of New York, a FRB bank.

### **HMDA-LAR Financial Institution Number and Name Table**

***(Including Re-Use/Mis-Use of HMDA Respondent Numbers by Different JPMorgan Chase and Company Institutions.)***

<b>HMDA-LAR Financial Institution/ Respondent Number</b>	<b>HMDA-LAR Financial Institution/ Respondent Name</b>	<b>Supervisory Agency</b>		<b>Comment</b>
22-1092200	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	OCC	1999-2001	Acquired by Chase Home Finance, LLC ON 1/1/ 2005, (No HMDA-LAR Public Disclosures ever submitted by Chase Home Finance, LLC.)
0001612400	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	FRB	1002-2003	
	Chase Manhattan Mortgage Corporation (CMMC) (NJ)	OCC	2004	
0000852218	Chase Manhattan Bank (NY)	FRB	1999-2000	
	JPMorgan Chase Bank (NY)	FRB	2001-2003	
	JPMorgan Chase Bank, N. A. (OH)	OCC	2011-2015	
0000023160	Chase Manhattan Bank USA, N. A. (DE)	OCC	1999-2004	HMDA-LAR Public Disclosures Invalidly submitted under Respondent ID 0000023160 between 2005 and 2008.
	Chase Bank USA, N. A.	OCC	2005-2015	No HMDA-LAR Public Disclosures ever submitted under any Respondent ID.
0000007621	Bank One, N. A. (OH)	OCC	2003	Year prior to merger.
0000000008	Bank One, N. A. (IL)	OCC	2003	Bank One, N. A. not surviving entity but its Respondent ID: 0000000008 continued to be used by JPMorgan Chase Bank, N. A. between 2004 and 2010.
	JPMorgan Chase Bank, N. A. (OH)	CFPB	2004-2010	
0000008551	Washington Mutual Bank (NV) <sup>IV</sup>	OTS	2007	Year prior to acquisition.
227620003	Bear Stearns Residential Mortgage (AZ)	OTS	2007	Year prior to acquisition.

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## **Merger Activities of JPMorgan Chase Bank, N. A.**

Significant merger activity relating to JPMCB N.A. occurred during the evaluation period, which impacted the activities considered in our evaluation. On July 1, 2004, Bank One Corporation, a large financial holding company, merged with JPMCC. Then on November 13, 2004, Bank One, N.A., Illinois and Bank One, N.A., Ohio, the bank subsidiaries of Bank One Corporation, were merged with JPMorgan Chase Bank. Simultaneously, JPMorgan Chase Bank converted from a state to national charter to become JPMorgan Chase Bank, N.A. Finally, on January 1, 2005, Chase Manhattan Mortgage Company, previously a JPMCB N.A. affiliate, was merged into Chase Home Finance, LLC.

At the same time, Chase Home Finance, LLC was merged into Chase Home Finance, Inc., a wholly-owned subsidiary of JPMCB N.A.

## **Regulation C Requirements for Respondent Institutions involved in Mergers and/or Acquisitions**

When a merger or an acquisition takes place questions often arise about how and when to report HMDA data. The five scenarios described below should answer many questions. You can refer others to your federal supervisory agency for resolution:

1. Two institutions merge, producing a successor institution whose assets exceed the asset threshold for coverage. Both were previously exempt because of asset size. The successor institution's first HMDA data collection will be for the calendar year following the year of the merger. No data collection is required for the year of the merger.
2. Two institutions merge, one covered and one exempt. The covered institution is the surviving institution. For the year of the merger, data collection for loan applications, originations, and purchases is required for the covered institution's transactions and is optional for transactions handled in offices of the previously exempt institution.
3. Two institutions merge, one covered and one exempt. The exempt institution is the surviving institution, or a new institution is formed. Data collection for loan applications, originations, and purchases is required for transactions of the covered institution that take place prior to the merger. Data collection is optional for transactions taking place after the merger date.
4. Two covered institutions merge. The surviving or resulting institution must report complete data for the year in which the merger occurred; the institution has the option of filing a consolidated report or separate reports for that year.
5. If the institutions reported to different agencies before the merger, the reports for the year in which they merged and all subsequent reports must be submitted to the agency designated by the supervisory agency of the surviving or resulting institution to receive that institution's data.

## **Common Regulation C Reporting Violations**

In a December 5, 2005, memorandum, the FFIEC reported that the common reporting errors in the 2004 data pertained to HOEPA status, rate spread, and preapproval codes. (See [www.ffiec.gov/hmda/pdf/FFIECguidance2005.pdf](http://www.ffiec.gov/hmda/pdf/FFIECguidance2005.pdf).)

A limited review of HMDA examinations since the reporting of the new data revealed that errors in collecting and reporting data elements often resulted in violations of law. Deficiencies noted were similar to those addressed in the December 2005 FFIEC memorandum, with the most frequently cited violations pertaining to the HOEPA status and the rate spread information. For example, some banks incorrectly reported rate spread information for loans that were not subject to Regulation Z. Others inaccurately reported loans as being subject to HOEPA, had erroneous information pertaining to preapproval requests, or failed to collect the ethnicity of applicants.

While violations may reflect errors rather than willful violation of requirements, repeat violations of the same or similar nature in subsequent examinations can result in the assessment of civil money penalties. Further review indicated that the HMDA violations often stemmed from

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weaknesses in the banks' compliance management systems, including inadequate training, insufficient monitoring, and lack of appropriate audit procedures. Addressing these weaknesses can minimize the potential for future violations.

## **REGULATION C VIOLATIONS UNDETECTED BY SUPERVISOR AGENCY – OCC.**

1. Allowed Chase Manhattan Bank USA, N. A. (aka: Chase Bank USA, N. A.) to openly-operate a clandestine Subprime Lending Boiler Room from 2004 through 2008, that targeted African Americans and other economically-disadvantaged consumers.
2. Allowed the Bank Officers of *Chase Manhattan Bank USA, N.A.* submit invalid, and possibly fraudulent LAR Certifications between 2005 and 2008 under the *Chase Manhattan Bank USA, N.A. respondent* name; even though this bank's name was changed to Chase Bank USA, N. A. by the OCC in January 2005.
3. Allow a non-FHA certified subprime and Alt-A lender: Chase-Direct Non-Prime Lending Division to submit more than five-hundred thousand applications using Respondent ID assigned to and OCC-supervised National Bank: Chase Manhattan Bank USA, N. A. (No further HMDA-LAR submissions received from this National Bank, after this "subprime boiler room" was closed down in 2008.)
4. *The 2005 LAR submitted for Chase Manhattan Bank USA, N.A. (aka: Chase Bank USA, N. A.), included 16,875 application records with duplicate sequence numbers. (These applications appeared to been created by another financial institution, and haphazardly appended to LAR submission for Chase Manhattan Bank USA, N. A.: Respondent Institution - 00000023160-1.)*
5. Allowed Chase Manhattan Bank USA, N. A. (aka: Chase Bank USA, N. A.) to submit LARs containing more than one half million application subprime and Alt-A records, without flagging any of these records as HOEPA Loans.
6. Allowed Institutions to submit annual LARs riddled with more than 80% quality edit failure errors between 2004 and 2008.
7. Allowed meagered responded - CMMC, and non-bank/non-submitter – CHF not submit LARs containing thousands of applications.
8. The merger between JPMCB and Bank One was not finalized until July 2004; but given that 63,220 conventional mortgage loans were received by JPMorgan Chase Bank (NY) in 2003, and 1,035,885 conventional mortgage loan applications were received by Bank One in 2003; only 271,480 conventional loan applications received during the 2004 by the merged entities. (It appears that none of hundreds of thousands of home mortgage loan applications received by JPMorgan Chase Bank (NY) and Bank One, prior to the July 2004 merger were submitted via HMDA-LAR.)
9. Washington Mutual Bank submitted 643,765, and Bear Stearns submitted 67,905 loan applications in 2003: However, in violation of Regulation C; JPMorgan Chase Bank, N. A. submitted no home mortgage loan applications for either of these respondents between January 1, 2008 and September 30, 2008.

## **NOTE1: OTHER POSSIBLE VIOLATIONS INCLUDING REGULATION W SECTION 223.15: "MEMBER BANK PURCHASE OF LOW-QUALITY ASSET FROM AN AFFILIATE"**

In general. A member bank may not purchase a low-quality asset from an affiliate unless, pursuant to an independent credit evaluation, the member bank had committed itself to purchase the asset before the time the asset was acquired by the affiliate.

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HNDA-LAR Public Raw Data Disclosures show that 78.7% of all home mortgage loans sold to JPMorgan Affiliates, were non-conforming, subprime mortgage loans. Many, if not most, of these non-conforming home mortgage loans were later classified as “Toxic Mortgages” by the DOJ in the November 2013 settlement of its 13 billion dollar lawsuit against JPMorgan Chase and Company.