| **ISSUE** | **INSTITUTION** | **VIOLATIONS** | **ACTION** | **AGENCY** | **DATE** | **PENALTY/****CORRECTIVE ACTION** |
| --- | --- | --- | --- | --- | --- | --- |
| [Flood](file:///C%3A%5CUsers%5CRobin%5CDownloads%5C18-0089k%20-Notice.pdf) | Park Bank,(Holmen, WI) | * Engaged in a pattern or practice of committing violations of 12 C.F.R. Part 339
	+ Failed to maintain adequate flood insurance
	+ Failed to notify borrower of insufficient coverage before force placing
	+ Failed to obtain adequate flood insurance at origination
	+ Failed notice of insufficient insurance
	+ Failed to force place insurance
	+ Failed to maintain an escrow account for designated loan
	+ Failed to provide flood notice (2)
 | CMP | FDIC | 12/19/18 | CMP: $7,850 |
| [Flood](file:///C%3A%5CUsers%5CRobin%5CDownloads%5C18-0106k.pdf) | Prairie State Bank And Trust (Springfield, IL) | * Bank violated Section 339.3(a) of the FDIC Rules and Regulations, 12 C.F.R. § 339.3(a), by failing to obtain flood insurance at origination in two instances, and failing to obtain or maintain adequate flood insurance in eleven instances; and Section 339.7(c) of the FDIC Rules and Regulations, 12 C.F.R. § 339.7, by failing to properly force place flood insurance in nine instances.
 | CMP | FDIC | 12/4/18 | CMP: $12,416 |
| [FCRA/](https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcfp_state-farm-bank_consent-order.pdf)[Regulation V](https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcfp_state-farm-bank_consent-order.pdf) | State Farm Bank, FSB(Bloomington, IL) | * Obtained consumer reports without a permissible purpose in violation of § 604(f) of the Fair Credit Reporting Act (FCRA), 15 U.S.C. § 1681b(f);
* Furnished inaccurate information about

consumers’ credit to CRAs that it knew or had reasonable cause to believe was inaccurate in violation of § 23(a)(1)(A) of FCRA, 15 U.S.C. § 1681s-2(a)(1)(A); * Failed to promptly update or correct information furnished to CRAs that incomplete or inaccurate in violation of § 623(a)(2) of FCRA, 15 U.S.C § 1681s-2(a)(2);
* Furnished information to CRAs without providing notice that the information was disputed by the consumer in violation of § 623(a)(3) of FCRA, 15 U.S.C. § 1681s-2(a)(3);
* Failed to establish and implement

reasonable written policies and procedures regarding the accuracy and integrity of information provided to CRAs in violation Regulation V, 12 C.F.R. 1022.42(a). | Consent Order | CFPB | 12/6/18 | State Farm Bank must:* Not violate the Fair Credit Reporting Act or Regulation V
* Implement and maintain reasonable written policies, procedures, and processes to address the practices at issue in the consent order, and prevent future violations.
 |
| [UDAAP](https://www.consumerfinance.gov/about-us/newsroom/bureau-consumer-financial-protection-files-complaint-and-proposed-settlement-village-capital-investment-llc/) | Village Capital and Investment, LLC.(Henderson, NV) | * Misled veterans regarding its Interest Rate Reduction Refinancing Loans—loans that allow veterans to refinance their mortgages at lower interest rates with a loan guaranteed by the Department of Veterans Affairs. Specifically, the Bureau alleges that Village Capital misled veterans by overstating the benefits of refinancing.
 | Complaint/Proposed Stipulation- Pending | CFPB | 12/4/18 | If entered by the court**:**Restitution: $268,869 CMP: $260,000. * Prohibit Village Capital from misrepresenting the terms or benefits of mortgage refinancing.
 |
| [Flood](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20181128a1.pdf) | MyBank(Belen, NM) | * Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, that implements the requirements of the National Flood Insurance Act.
 | CMP | FRB | 11/26/18 | CMP: $49,000 |
| [UDAAP](https://s3.amazonaws.com/files.consumerfinance.gov/f/documents/bcfp_santander-consumer-usa_consent-order_2018-11.pdf) | Santander Consumer USA, Inc.(Dallas, TX) | * Engaged in deceptive acts and practices in marketing its S-GUARD GAP add-on product, in violation of sections 1031 and 1036 of the Consumer Financial Protection Act of 2010 (CFPA), 12 U.S.C. §§ 5531, 5536;
* Misrepresented to consumers the impact of receiving a loan extension, including by obscuring that the additional interest accruing during the extension period would become due immediately upon the next scheduled payment, in violation of sections 1031 and 1036 of the CFPA, 12 U.S.C. §§ 5531, 5536.
 | Consent Order | CFPB | 11/7/18 | * Clearly and prominently disclose the terms of its loan extensions and the add-on product;

CMP: $2.5 millionRestitution: $9.29 million to certain consumers who purchased the add-on product. |
| [Flood](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20181113a1.pdf) | The First State Bank Of Dongola, (Dongola, IL) | * A pattern or practice of violations of Regulation H, 12 C.F.R.§ 208.25, that implements the requirements of the Act
 | CMP | FRB | 11/7/18 | CMP: $15,000 |
| [UDAAP](https://www.consumerfinance.gov/policy-compliance/enforcement/actions/cash-express-llc/) | Cash Express, LLC(Cookeville, TN) | * Deceptively threatened in collection letters that it would take legal action against consumers, even though the debts were past the date for suing on legal claims, and it was not Cash Express’s practice to file lawsuits against these consumers.
* Misrepresented that it might report negative credit information to consumer reporting agencies for late or missed payments, when the company did not actually report this information.
* Abusively withheld funds during check-cashing transactions to satisfy outstanding amounts on prior loans, without disclosing this practice to the consumer during the initiation of the transaction.
 | Consent Order | CFPB | 10/24/18 | * Barred from automatically taking money from check-cashing transactions unless certain conditions are met.
* Cash Express is further barred from making misrepresentations about its consumer reporting activities and its intention or likelihood of filing suit to collect a debt.

Restitution: $32,000 CMP: $200,000  |
| [TILA/ Regulation Z](file:///C%3A%5CUsers%5CRobin%5CDownloads%5C18-0011k%20%282%29.pdf) | Republic Bank and Trust Company(Louisville, KY) | * The FDIC considered the matter and determined that the Bank violated section 122(a) of the Truth in Lending Act, 15 U.S.C. § 1632(a), and section I026.5(a)(l) of Regulation Z, 12 C.F.R. § 1026.S(a)(l), by failing to clearly and conspicuously disclose required information related to the Bank's Elastic line of credit product, offered pursuant to a contract with Elevate@Work, L.L.C.,
* Deposit processing violations
 | CMP | FDIC | 10/18/18 | CMP: $300,000 |
| [UDAAP](https://www.consumerfinance.gov/policy-compliance/enforcement/actions/bluestem-brands-inc/) | Bluestem Brands, Inc. | * Consumer debts were sold to debt buyers and Bluestem engaged in unfair acts and practices by substantially delaying forwarding post sale payments made by consumers to Bluestem.
 | Consent Order | CFPB | 10/4/18 | Update processes, systems, and controls to ensure timely ID and forwards Direct Pays to the appropriate debtBuyers, compliance plan.CMP: $200,000 |
| [Flood](file:///C%3A%5CUsers%5CRobin%5CDownloads%5C18-0158k%20%281%29.pdf) | Gibsland Bank and Trust Company(Gibsland, LA) | * The Bank engaged in a pattern or practice of committing 24 violations of section 102(b)(l) of the FDPA, 42 U.S.C. § 4012a(b)(l), and section 339.3(a) of the FDIC Rules and Regulations, 12 C.F.R. § 339.3(a), for failure to obtain flood insurance at or before loan origination or renewal.
 | CMP | FDIC | 10/1/18 | CMP: $9,600 |
| [FHA/Fair Lending](https://www.hud.gov/press/press_releases_media_advisories/HUD_No_18_107) | Loan Depot.com, LLC(Foothill Ranch, CA)and Appraisal Management Services of America, Inc.(Fountain Valley, CA) | * Alleged the lender refused to refinance homes because they were Native American and home was on Native American Land.
* Appraisal Management Services of America informed loanDepot.com it could not provide an appraisal on the home because it was on “Indian land.”
 | Conciliation Agreement | HUD | 9/21/18 | Loan Depot.com:* $30,000 to each homeowner (2);
* $40,000 loan subsidy program;
* $240,000 for outreach programs for Native Americans on or around reservations.

Loan Depot.com:* Revise policies regarding underwriting of home mortgage loans on land located within the boundaries of American Indian reservations to ensure consistency with the Fair Housing Act.

Appraisal Management Services:* Revise policies regarding appraisals for mortgages on homes located on American Indian reservations.

No longer contract with appraisers who refuse to conduct appraisals on reservations. |
| [CMS](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=6705002d-fb08-48c3-be2c-28c7c2675839) | Peoples Bank and Trust Company (Ryan, OK) | * Weaknesses in the Bank's Compliance Management System
 | Consent Order | FDIC | 9/17/18 | Develop CMS commensurate with level of risk. BofD/Sr.Mgmt must ensure Bank:* Demonstrates clear expectations about compliance, within the Bank and to third-party providers;
* Adopts clear policies;
* Has Compliance Off. with authority;
* Has adequate resources;
* Identifies risks across products, services, activities;

Conduct audits and reports to BofD. |
| [FHA](https://www.hud.gov/press/press_releases_media_advisories/HUD_No_18_101)[DOJ](https://www.justice.gov/crt/case/united-states-v-advocate-law-groups-florida-pa-md-fla) | Advocate Law Groups of Florida, P.A., Jon B. Lindeman, Jr., and Ephigenia K. Lindeman | * Targeted Hispanic families through deceptive ad campaigns
* Entice families to pay significant upfront fees /sign contracts predominantly written in English.
* Instructed homeowners to stop making mortgage payments
* Threatened fines, or foreclosure if borrower sought to terminate their relationship and Failed to obtain favorable mortgage modifications while charging thousands of dollars in up-front and recurring monthly fees.
 | Charge Of Discrimina-tion/ Complaint filed by DOJ | HUD/DOJ | 9/11/18/10/29/18 | Pending |
| [UDAAP](https://www.consumerfinance.gov/policy-compliance/enforcement/actions/future-income-payments-llc/) | Future Income Payments, LLC | * Alleges that FIP represented to consumers that their pension-advance products were not loans, were not subject to interest rates, and were comparable in cost to, or cheaper than, credit-card debt when, in actuality, the pension-advance products were loans, and were subject to interest rates that were substantially higher than credit-card interest rates.
 | Formal Complaint | CFPB | 9/13/18 | Pending |
| [Flood](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20180830a1.pdf) | The Bank of New York Mellon (New York, NY) | * Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25.
 | CMP | FRB | 8/28/18 | CMP: $16,000 |
| [FHA/Fair Lending](https://www.hud.gov/PRESS/PRESS_RELEASES_MEDIA_ADVISORIES/HUD_NO_18_085)[FHA/Fair Lending](https://www.hud.gov/sites/dfiles/FHEO/images/2018all.pdf)(All HUD actions for 2018) | Facebook | * Violating the Fair Housing Act by allowing landlords and home sellers to use its advertising platform to engage in housing discrimination.
 | Formal Complaint | HUD | 8/17/18 | Charge of Discrimination issued 3/28/19 (See 2019 Lending Enforcement Actions chart.) |
| [Mortgage Loan Servicing](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20180810a.pdf) | Citigroup (New York, NY) | * Citigroup identified/reported evidence that in 2015: (a) mortgage-related affidavits were executed by CitiFinancial employees making assertions regarding the ownership of the mortgage note (“Lost Note Affidavits”) based on personal knowledge or review of relevant books/records, without such personal knowledge or review the relevant books/records; and (b) Lost Note Affidavits were not properly notarized as they were not signed or affirmed in the presence of a notary. CitiFinancial exited the mortgage servicing business in 2017.
 | CMP | FRB | 8/10/18 | CMP: $8.6 million |
| [UDAAP/TIL](https://www.consumerfinance.gov/about-us/newsroom/bureau-consumer-financial-protection-settles-triton-management-group/) | Triton Management Group | * Failed to properly disclose finance charges associated with their auto title loans in Mississippi.
* Advertisements failed to disclose the annual percentage rate and other information required by the Truth in Lending Act.
 | Consent Order | CFPB | 7/19/18 | CMP: $ $1,522,298 Penalty suspended with restitution payment of $500,000 |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=15befb0b-db78-47d8-870d-86ab7848933e) | Southwest Capital Bank(Albuquerque, NM) | * Failure to obtain flood insurance at or before loan origination or renewal in four instances;
* Failure to maintain flood insurance for the term of the loan in two instances;
* Failure to notify the borrower to obtain flood insurance when the Bank determines a designated loan is not covered by flood insurance in three instances; and
* Failure to purchase flood insurance on the borrower's behalf within 45 days after notification in three instances.
 | CMP | FDIC | 7/16/18 | CMP: $10,800 |
| [TILA](https://www.consumerfinance.gov/about-us/newsroom/bureau-consumer-financial-protection-settles-citibank-na/) | Citibank(Sioux Falls, SD) | * Violated the Truth in Lending Act by failing to reevaluate and reduce the annual percentage rates (APRs) for approximately 1.75 million consumer credit card accounts consistent with regulatory requirements, and by failing to have reasonable written policies and procedures to conduct the APR reevaluations consistent with regulation.
 | Consent Order | CFPB | 6/29/18 | Restitution: $335 million(no CMP assessed due to self- identification and reporting of the violation and self-initiated remediation.)  |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=52490a58-bebc-4699-84e6-c006ba329f84) | The Bank of Holly Springs(Holly Springs, MS) | * Bank engaged in a pattern or practice of committing violations of section 102(b )(1) of the FDPA, 42 U.S.C. § 4012a(b)(l), and section 339.3(a) of the FDIC Rules and Regulations, 12 C.F.R. § 339.3(a) by failing to obtain flood insurance coverage at or before loan origination or renewal on seven (7) loans secured by a building or mobile home that is located or to be located in a special flood hazard area,
 | CMP | FDIC | 6/16/18 | CMP: $7,000 |
| [UDAAP and FCRA](https://www.consumerfinance.gov/about-us/newsroom/bureau-consumer-financial-protection-settles-security-group-inc/) | Security Group, Inc.(Spartanburg, SC) | * Violated the Consumer Financial Protection Act by making improper in-person and telephonic collection attempts on consumer installment loans and retail sales installment contracts.
* Violated the Fair Credit Reporting Act by regularly furnishing inaccurate and incomplete information about consumers to credit reporting agencies.
 | CMP | CFPB | 6/13/18 | CMP: $5 million |
| [Regulation O Violation by Insider](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=43b72615-9fc2-467e-923e-a3755d70c7b8) | Valley Bank(Moline, IL)Robert Fick (Director) | * Fick violated Regulation O of the Board of Governors of the Federal Reserve ("Regulation O"), 12 C.F.R. Part 215, concerning certain loans from the Bank to Respondent and his related interests.
* Fick violated or caused the Bank to violate 12 C.F.R. § 363.
 | CMP | FDIC | 5/18/18 | CMP assessed against Robert Fick: $15,000  |
| [Fair Lending](https://www.justice.gov/opa/pr/justice-department-reaches-settlement-minnesota-bank-resolve-allegations-lending) | Kleinbank(Minneapolis, MN) | * Bank engaged in lending discrimination by “redlining” predominantly minority neighborhoods in and around the Twin Cities of Minneapolis-St. Paul, Minnesota.
 | Settlement | DOJ | 5/8/18 | * Invest $300,000 in a loan subsidy fund to increase the amount of credit that KleinBank extends to residents of predominantly minority neighborhoods,
* Invest $300,000 in advertising, outreach, financial education, and credit repair in order to improve the bank’s visibility in, and successful expansion into, its new service area.
* Employ a community development officer to oversee the development of the bank’s lending in predominantly minority neighborhoods
* Conduct fair lending training
 |
| [Flood](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20180501a1.pdf) | The Bank of Fayette County(Piperton, TN) | * Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, that implements the requirements of the Flood Disaster Protection Act.
 | CMP | FRB | 5/1/18 | CMP: $12,000 |
| [Flood](https://www.occ.gov/static/enforcement-actions/ea2018-030.pdf) | PNC Bank(Pittsburgh, PA) | * Pattern or practice of violations of the Flood Act and its implementing regulations, specifically 12 C.F.R. § 22.3(a);
 | CMP | OCC | 5/1/18 | CMP: $207,245 |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=f34f92d8-5073-4d32-85dd-1459e9bcfc6b) | Sussex Bank(Franklin, NJ) | * Bank engaged in a pattern or practice of committing violations of the FDPA and/or the notice requirements under section 1364 of the National Flood Insurance Act of 1968, 42 U.S.C. 4104a, (12 C.F.R. Part 339). On 20 occasions violated the FDPA and 12 C.F.R. § 339.3(a), which requires that the building, mobile home, and personal property securing a designated loan be covered by flood insurance for the tem1 of the loan.
 | CMP | FDIC | 4/10/18 | CMP: $5,000 |
| [UDAP/ UDAAP](https://www.consumerfinance.gov/about-us/newsroom/bureau-consumer-financial-protection-announces-settlement-wells-fargo-auto-loan-administration-and-mortgage-practices/) | Wells Fargo(Sioux Falls, SD) | * Unfairly failed to follow the mortgage-interest-rate-lock process it explained to some prospective borrowers; and
* Operated its Force-Placed Insurance program in an unfair manner.
 | Consent Order/CMP | CFPB/OCC | 4/20/18 | CMP: $1 billion* Submit Compliance Risk Management and Audit Plan
* Submit remediation Plan
 |
| [UDAP](https://www.bankersonline.com/penalty/158084) (FDIC Link broken) | Cross River Bank,and Freedom Financial Asset Management, LLC(Teaneck, NJ) | Bank committed violations of law and/or regulations, including: * UDAP, Section 5 of the Federal Trade Commission Act (“Section 5”), 15 U.S.C. § 45(a)(1);
* Section 1026.17(c) of Regulation Z, 12 C.F.R. Part 1026;
* Section 1005.10(e)(1) of Regulation E, 12 C.F.R. Part 1005.
* Bank engaged in unsafe or unsound banking practices by failing to ensure an adequate compliance management system (“CMS”) was in place, including sufficient resource allocation, and operated without effectively overseeing and supervising the Bank’s products and services offered in conjunction with third parties.
* FFAM, in its role in originating and servicing Consolidation Plus Loans (“C+ Loans”) and Freedom Plus Loans to consumers, committed violations of law and/or regulations, including, but not limited to, engaging in UDAP in violation of Section 5 of the Federal Trade Commission Act (“Section 5”), 15 U.S.C. § 45(a)(1); Section 1026.17(c) of Regulation Z, Section 1005.10(e)(1) of Regulation E.
 | Consent Order/Agreement to Pay | FDIC | 3/28/18 | CMP: $1,135,250Restitution: $20,000 |
| [Military Lending](https://www.enforcementwatch.com/2018/04/04/doj-brings-suit-against-california-auto-lender-under-scra/) | California Auto Finance | * Servicemember notified California Auto Finance that she would be entering the military the following month. Despite this advance notice, California Auto Finance repossessed servicemember’s vehicle without a court order on her first day of active military training.
* Alleges California Auto Finance had no process to determine customers’ military status – such as checking the Department of Defense’s publicly available database – prior to repossessing their cars.
 | Formal Complaint | DOJ | 3/28/18 | 3/6/19 California Auto Finance agreed to enter into a court-enforceable consent order to resolve allegations that it illegally repossessed two servicemembers’ cars without court orders while they were on active duty.[Proposed Consent Decree](https://www.justice.gov/crt/case/united-states-v-california-auto-finance-cd-cal):California Auto Finance would adopt new repossession policies, pay one servicemember $30,000, and pay a $50,000 civil penalty to the United States. |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=48a8b4f9-c50c-4ff1-b550-7e46a8e013d9) | Crest Savings Bank(Wildwood, NJ) | * On 9 occasions violated requirement that the building, mobile home, or personal property securing a designated loan be covered by flood insurance for the term of the loan;
* On 14 occasions violated requirement that if at any time during the term of the loan the building or mobile home is not covered by flood insurance the bank or its servicer must notify the borrower that the borrower should obtain, at the borrower's expense, flood insurance that meets such requirements for the remaining term of the loan and, if the borrower fails to obtain such flood insurance within 45 days after notification, the bank or its servicer must purchase such insurance on the borrower's behalf.
 | CMP | FDIC | 3/19/18 | CMP: $10,000 |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=977f09a0-744c-4cb0-bbdc-a40097fae84d) | Monroe Bank and Trust(Monroe, MI) | * Failing to obtain flood insurance on a building securing a designated loan at the time of the origination of two (2) loans;
* Failing to obtain adequate flood insurance for twenty two (22) loans;
* Failing to maintain flood insurance for two (2) loans;
* Failing to follow force placement flood insurance procedures for thirteen (13) loans.
 | CMP | FDIC | 3/9/18 | CMP: $46,800 |
| [Military Lending](https://www.justice.gov/opa/pr/justice-department-obtains-over-2-million-servicemembers-who-terminated-their-motor-vehicle) | BMW Financial Services | * Individuals who lease vehicles from BMW FS, including servicemembers, often contribute an up-front monetary amount at lease signing, in the form of a cash payment, credit for a trade-in vehicle, or rebates or other credits. A portion of this up-front amount can be applied to the first month of the lease and certain up-front costs such as licensing and registration fees. The remainder, which is called the capitalized cost reduction (CCR) amount, operates to reduce the monthly payment the lessee must make over the term of the lease.
* The Department’s investigation revealed that BMW FS had failed to refund any portion of the pre-paid CCR amounts to 492 servicemembers who had lawfully terminated their auto leases.
 | Settlement | DOJ | 2/22/18 | * Requires refund to each servicemember portions of the pre-paid CCR amount based on how many days were remaining in the lease.
* Pay indirect damages to each servicemember of three times the refund or $500, whichever is larger.
* Deposit $2,165,518.84 into an escrow account to compensate the 492 servicemembers whose rights were violated under the SCRA.
* Pay $60,788 to the United States Treasury.
* Revise policies and procedures to ensure that servicemembers who terminate their auto leases early receive a full refund of all eligible pre-paid CCR amounts.
 |
| [Flood](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20180215b1.pdf) | Clear Mountain Bank (Bruceton Mills, WV) | * Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, that implements the requirements of the Flood Disaster Protection Act.
 | CMP | FRB | 2/12/18 | CMP: $14,000 |
| [Flood](https://www.federalreserve.gov/newsevents/pressreleases/files/enf20180112b1.pdf) | Goldman Sachs Bank(New York, NY) | * Pattern or practice of violations of Regulation H, 12 C.F.R. § 208.25, that implements the requirements of the Flood Disaster Protection Act.
 | CMP | FRB | 1/12/18 | CMP: $90,000 |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=19107e4e-a35e-4437-b95c-e5cad773d41c) | Bank of Lake Mills (Lake Mills, MI) | * Failing to obtain flood insurance on a building securing a designated loan at the time of the origination of four loans;
* Failing to obtain adequate flood insurance at the time of the origination of one loan;
* Failing to provide to borrowers a Notice of Special Flood Hazard and Availability of Federal Disaster Relief Assistance when making, increasing, extending or renewing a loan on one occasion;
* Failing to provide to borrowers a Notice of Special Flood Hazard and Availability of Federal Disaster Relief Assistance within a reasonable time before the completion of the transaction on five (5) loans.
 | CMP | FDIC | 1/11/18 | CMP: $5,000 |
| [Flood](https://www5.fdic.gov/EDOBlob/Mediator.aspx?UniqueID=8ea203ee-e8e7-412a-9fcf-14b1a8b696b5) | Hantz Bank(Southfield, MI) | * Failing to obtain flood insurance at origination in four instances;
* Failing to maintain adequate flood insurance in two instances;
* Failing to properly force place flood insurance in two instances;
* Failing to provide notice to borrowers that the collateral for the loan was in a designated special flood hazard area in six instances.
 | CMP | FDIC | 1/10/18 | CMP: $14,800 |

2018 YTD\* (released as of 12/28/18) LENDING COMPLIANCE RELATED ENFORCEMENT ACTIONS

(NUMBER BY PENALTY TYPE AND REGULATOR)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| LAW/REGULATION | FDIC | FRB | OCC | CFPB | HUD | DOJ | NCUA | **TOTAL** |
| FAIR LENDING | - | - | - | - | 3 | 1 | - | **4** |
| FLOOD | 10 | 5 | 1 | - | - | - | - | **16** |
| MILITARY LENDING | - | - | - | - | - | 2 | - | **2** |
| TILA/RESPA | 1 | 1 | - | 2 | - | - | - | **4** |
| UDAP/UDAAP | 1 | - | 1 | 7 | - | - | - | **9** |
| OTHER | 2 | 1 | - | 2 | - | - | - | **5** |
| **TOTAL** | **14** | **7** | **2** | **11** | **3** | **3** | **0** | **40** |

NOTE: Enforcement actions may include violation of more than one law or regulation.

\*Lending compliance enforcement actions against financial institutions and others (non-individuals). Intended for educational purposes. Not guaranteed to be comprehensive.