

## Housing Discrimination Complaint

### Case Number:

#### 1. Complainants:

California Reinvestment Coalition (CRC)  
474 Valencia St, Ste 230  
San Francisco, CA 94103

#### 2. Complainant Representatives:

Kevin Stein  
California Reinvestment Coalition  
474 Valencia St, Ste 230  
San Francisco, CA 94103

#### 3. Other Aggrieved Parties:

#### 4. The following is alleged to have occurred or is about to occur:

- Discriminatory refusal to sell
- Discriminatory financing (includes real estate transactions)
- Discriminatory terms, conditions, privileges, or services and facilities
- Redlining

#### 5. The alleged violation occurred because of:

- National Origin
- Color
- Race

6. **Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):**

CA

7. **Respondents:**

CIT Bank, National Association, dba OneWest Bank  
888 East Walnut Street  
Pasadena, CA 91101

CIT Group, Inc  
1 CIT Drive  
Livingston, NJ 07039

8. **The following is a brief and concise statement of the facts regarding the alleged violation:**

Complainant California Reinvestment Coalition is a nonprofit corporation. Complainant alleges that Respondent CIT Group, by and through its CIT Bank, N.A. subsidiary, the successor to OneWest Bank, and its subsidiaries and affiliates (hereinafter and collectively, "Respondent") violated and continues to violate the Fair Housing Act by providing residential real estate related transactions in a manner that discriminates because of race, color and national origin.

Specifically, Complainant alleges that since at least 2011, Respondent discriminated in the marketing and origination of housing-related products, as evidenced by the low number of mortgages it made to African-American, Asian-American, and Latino borrowers in comparison to the demographics of the counties in Respondent's CRA assessment area and to the average industry market share. Complainants also allege Respondent discriminated on the basis of race, national origin and/or color, in locating and maintaining most of its bank branches in areas that serve majority-white communities and do not serve areas of high minority concentration. Complainant alleges that Respondent's practices amount to redlining and deny equal access to housing-related services, including mortgages, to borrowers because of their race, color and national origin in violation of the Fair Housing Act.

Specifically, complainant alleges that in the 6 counties that comprise Respondent's CRA assessment area:

- In African American majority neighborhoods: 0 Respondent branches; .7% of industry branches
- In Asian American majority neighborhoods; 1.4% of Respondents branches; 6.6% industry branches
- In Latino majority neighborhoods: 14.9% Respondent's branches; 19.6% of industry branches

In addition, Complainant alleges that market share and other analyses of Home Mortgage Disclosure Act (HMDA) data and data provided to federal banking regulators show that, since at least 2011, Respondent made few loans to Asian American, African American, and Latino borrowers and communities in absolute terms, in relation to the demographics of the counties in Respondent's CRA assessment area, and/or in relation to the industry as a whole. For example, for home loans originated in Respondent's six county CRA assessment area, Respondent had the following market shares in 2014:

- Respondent market share for all home loans - .03%
- Respondent market share for loans originated in majority minority census tracts - .02%
- Respondent market share for loans originated to Asian American borrowers - .02%
- Respondent market share for loans originated to Latino borrows .01%
- Respondent market share for loans originated to African American borrows - 0% (no loans originated to African American borrowers)

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9. **The most recent date on which the alleged discrimination occurred:**

, and is continuing.

10. **Types of Federal Funding Identified:**

11. **The acts alleged in this complaint, if proven, may constitute a violation of the following sections:**

804a or f, 805, and 804b or f of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.



On Behalf of CRC

2/14/17

Date

**NOTE : HUD WILL FURNISH A COPY OF THIS COMPLAINT TO THE PERSON OR ORGANIZATION AGAINST WHOM IT IS FILED.**