

COMPLAINT NARRATIVE

CHASE MANHATTAN BANK USA, N. A. OPERATED A CLANDESTINE SUBPRIME MORTGAGE LENDING DIVISION THAT WAS UNKNOWN TO HUD AND OCC; AND THIS CENTER SPECIFICALLY TARGETED ECONOMICALLY DISTRESSED CONSUMERS, INCLUDING MORE THAN THIRTY-TWO THOUSAND AFRICAN AMERICANS BETWEEN 2004 AND 2008.

ATTACHMENTS

<Y:\rightnow\Incident\1947691\CLAIM TWO.pdf> (8.1 MB)

<Y:\rightnow\Incident\1947691\1999-2014 JPM Institutons - HMDA-LAR Public Disclosure Summary.pdf> (255 KB)

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