



# REPORT

CDBG CONTRACT BETWEEN  
THE CITY OF KALAMAZOO AND FAIR HOUSING CENTER OF SOUTHWEST MICHIGAN  
Prepared by: FHCSWM Staff

The City of Kalamazoo contracted with the Fair Housing Center of Southwest Michigan to conduct two systemic housing investigations during the 2017-2018 year. A systemic housing investigation is an investigation of alleged discrimination that is pervasive or institutional in nature, or where the collection and analysis of data to develop a complaint will involve complex issues, novel questions of fact or law, or will potentially affect a large number of persons. The two systemic investigations focus on real estate agents and race discrimination, and lending institutions and home mortgage lending discrimination.

# Home Mortgage Lending Institutions Investigation

**Background** - The Fair Housing Act prohibits discrimination in the sale, rental, and financing of residential dwellings, and in other residential real estate related transactions, based on race, color, national origin, religion, sex, familial status, and disability (protected classes). For this investigation, the City of Kalamazoo contracted with the Fair Housing Center of Southwest Michigan to investigate discrimination in the financing of residential dwellings on the basis of race.

A lender commits discriminatory lending practices when they:

- Refuse to make a mortgage loan due to the applicant's membership in a protected class
- Refuse to provide information regarding mortgage loans due to the applicant's membership in a protected class
- Impose different terms or conditions on a mortgage loan due to the applicant's membership in a protected class
- Discriminates in appraising property due to the applicant's membership in a protected class
- Steers an applicant toward a bad mortgage loan product due to the applicant's membership in a protected class
- Provides inferior servicing of a mortgage loan due to the applicant's membership in a protected class

**Home Mortgage Disclosure Act** - The Home Mortgage Disclosure Act ("HMDA") requires lending institutions to collect data about loan applicants. Currently, the Consumer Financial Protection Bureau oversees lender's compliance with HMDA. From the HMDA data, there were 1226 home purchase "total applications" submitted to lenders in the City of Kalamazoo in 2017. 'Total applications' equals the total number of loans originated, applications approved but not accepted, applications denied, applications withdrawn, and files closed for incompleteness; excludes loans purchased, pre-approval requests denied and pre-approval requests approved but not accepted.

The representation of loan types were 898 Conventional loans, 292 FHA-insured, and 36 VA-guaranteed. Racial demographics for applicants were 7 American Indian or Alaska Native, 19 Asian, 124 Black or African American, 980 White, and 96 applications with unavailable race data. Additionally, of the 1226 home purchase applications, 42% of the applicants were female, 53% were male, and 4% of the applications had undisclosed or unavailable sex data.

Some analysis of the data reveals, overall the City had a 14.3% denial rate, where denial rate represents the 'applications denied' divided by the number of 'total applications'. The denial rate differs between the races, though. White applications were denied 11% of the time, however borrowers of color were denied 28% of the time. Black or African-American borrowers were denied 34.6% of the time. In a City to Kalamazoo County comparison, White applicants were denied 7.8% of the time throughout the County, and Black or African-American applicants were denied 25% of the time.

The most exclusive census tract within the City is 15.07, where White applicants were denied 65.1% of the time and Black or African-American applicants were denied 61.7% of the time. In census tract 2.02, part of the Northside Neighborhood, zero loans were originated for the year of 2017.

**Methodology of Investigation** - For each test, two testers were assigned, one Black tester, one White tester. Both testers were assigned to visit the mortgage lending institution to inquire about 1) how much home they could afford based on their financial data and 2) what loan products are available based on the same financial data. The purpose of these paired tests was to determine whether comparably qualified Black and White home mortgage borrowers receive the same information, service, treatment, and access to available mortgage lending options. For this systemic investigation, nine local lending institutions were investigated, and seven of which were successful investigations.

Both Black and White tester profiles were composed of two gainfully employed individuals, husband and wife, and one child. Both Black and White tester profiles included employment at Kalamazoo’s major companies, and positions that pay at or above median income for Kalamazoo-Metro area. Both Black and White testers are looking to purchase a home that is Kalamazoo Promise eligible. Both Black and White tester profiles had good credit, low debt to income ratio, no history of money judgements, substantial assets available for down payment, and all financial aspects a lender would consider as a “prime” borrower. In fact, the only difference between the Black and White tester profiles is the Black tester has slightly better credit, income, and savings, while the White tester had slightly higher debt.

Structuring the investigation in such a way is meant to rule out potential discrimination on the basis of a borrower’s qualifications. If lenders consider only testers’ financial data, then Black testers should receive both larger loan amounts and better interest rates.

**Table of Analysis** - In the following table, the seven separate lending institutions investigated are analyzed. Agencies are labeled as agency 1, 2, 3..and so on, in an effort to maintain anonymity. The table outlines the differences of service, treatment, and access to available financing options experienced by Black and White testers.

Note: for all agencies except for agency #5, testers met with the same agent.

<b>Service, Treatment, and Access</b>	
<b>Agency #</b>	<b>Summary of Differences</b>
<b>1</b>	<ul style="list-style-type: none"> <li>● Agent only asked Black tester the length of their debts.</li> <li>● Agent only asked White tester if they are a veteran, their preferred down payment, if they have any money judgements, utility bill estimate, and age.</li> <li>● Agent only told White tester that moving to Kalamazoo Public Schools might be a “culture shock”.</li> <li>● For Black tester, agent recommended a purchase price range of \$240,000-\$315,000, a house payment between \$1,500 and \$2,000, down payment of 15%, hypothetical interest rate of 5%, and estimated cash-to-close (minus down payment) of \$6,000.</li> <li>● For White tester, agent recommended a purchase price of \$200,000, a house payment between \$1,480 and \$1,550, down payment of 10%, did not provide a hypothetical interest rate, and estimated cash-to close (minus down payment) of \$5,000.</li> </ul>

<p style="text-align: center;">2</p>	<ul style="list-style-type: none"> <li>● Agent only asked Black tester if they have looked at properties and for their preferred price range, and for spouse’s credit information.</li> <li>● Agent only asked White tester their preferred area to live in, full name, DOB, phone number, information on money judgements, citizenship, child support, and if house will be used as a primary residence.</li> <li>● Agent only told Black tester that he has recommendations.</li> <li>● Agent openly labeled only the White tester, as non-Hispanic, White, male, with a female wife.</li> <li>● Black tester made an error and stated that he would like his purchase price to be less than \$210,000. Agent recommended a purchase price of \$200,000, a house payment of \$900, down payment of 20%, 4.625% interest rate, and estimated cash-to-close (minus downpayment) of \$6,000.</li> <li>● For White tester, agent recommended a purchase price range of \$220,000 to \$250,000, a house payment between \$1,264 and \$1,473, down payment of 20%, hypothetical interest rate of 4.75%, and no estimated cash-to-close.</li> </ul>
<p style="text-align: center;">3</p>	<ul style="list-style-type: none"> <li>● Agent refused to provide Black tester any estimate without a credit check. Agent said once tester provides necessary documents they can confirm if the information is true.</li> <li>● Agent provided an estimate to White tester without a credit check. Agent said tester has “no reason to lie” about credit score.</li> <li>● Agent only asked Black tester about their place of employment, mix of debts, age.</li> <li>● Agent only asked White tester if they have a house picked out, family size, credit information, if they have a real estate salesperson.</li> <li>● Agent rambled (unprompted and unprovoked) for over 20 minutes to Black tester about his opinion on things not related to lending. Examples include: <ul style="list-style-type: none"> <li>○ “Bimbo, whorish, bi****”, in reference to Michael Jordan’s infidelity.</li> <li>○ “Politics divide us...There is no such thing as racism...Every culture has been enslaved.”</li> <li>○ Agent spoke of a professor who would try to upset students and make them walk out of class. The professor would stereotype students who were Black, White, and Chinese. Agent listed stereotypes professor would use, such as Black students’ hair and tennis shoes and Chinese students only being here to read and write.</li> <li>○ Agent stated his opinion on many things, including politics, politicians, power, wealth, and slavery. Eg. Immigration: agent’s opinion is that although children shouldn’t be taken from the families, people shouldn’t break the law, and you shouldn’t let just anyone into your home.</li> </ul> </li> <li>● Agent told White tester only that they can get a loan based on the property of interest.</li> <li>● For Black tester, agent provided <i>hypothetical</i> numbers of a purchase price range of \$100,000 to \$200,000, house payment \$800 to \$1,500, a “lower the better” down payment, 5.125% interest rate, and estimated cash-to-close of \$6,000. Numbers provided were not based on tester’s financial information.</li> <li>● For White tester, agent recommended a purchase price range of \$100,000 to \$432,000, a house payment between \$800 and \$3,250, a “lower the better” down payment, no estimated interest rate, and cash-to-close of \$6,000. Numbers were based off of tester’s financial information.</li> </ul>

<p style="text-align: center; font-size: 24pt;">4</p>	<ul style="list-style-type: none"> <li>● Agent only told White tester about an agency exclusive program that allows borrowers to lock in a lower interest rate.</li> <li>● Agent only told White tester about paying a premium for PMI, which saves over \$5,000 in the long run.</li> <li>● For Black tester, agent recommended 3 options: <ul style="list-style-type: none"> <li>○ 30 year fixed, \$250K purchase price, \$1,570 payment, 20% down payment, 4.99% interest rate, \$6,330 to cash-to-close.</li> <li>○ 20 year fixed, \$250K purchase price, \$1,810 payment, 20% down, 4.875% interest rate, \$6,320 cash-to-close.</li> <li>○ 15 year fixed, \$250K purchase price, \$2,020 payment, 20% down, 4.375% interest rate, \$6,280 cash-to-close.</li> </ul> </li> <li>● For White tester, agent recommended 4 options: <ul style="list-style-type: none"> <li>○ 30 year w/ monthly PMI, \$300K purchase price, \$2,160 payment, 10% down payment, 4.75% interest rate, \$7,690 cash-to-close.</li> <li>○ 30 year w/ single PMI, \$300K purchase price, \$2,060 payment, 10% down payment, 4.75% interest rate, \$13,310 cash-to-close.</li> <li>○ 30 year w/ monthly PMI, \$250K purchase price, \$1,910 payment, 10% down payment, 4.75% interest rate, \$7,510 cash-to-close.</li> <li>○ 30 year w/ single PMI, \$250K purchase price, \$1,820 payment, 10% down payment, 4.75% interest rate, \$12,190 cash-to-close.</li> </ul> </li> </ul>
<p style="text-align: center; font-size: 24pt;">5</p>	<ul style="list-style-type: none"> <li>● Agent asked Black tester only if they are a veteran, place of employment</li> <li>● Agent asked White tester only their preferred price range, type of employment, current rent, length of employment, previous employment, and wife's employment.</li> <li>● Black tester waited 9 minutes to be greeted. Agent said, "What's going on". Tester was provided loan options by a sales associate.</li> <li>● White tester waited under 1 minute to be greeted. Agent was referred to a loan officer.</li> <li>● Agent used zip code 49009 for Black tester estimates.</li> <li>● Agent used unknown zip code for White tester estimates.</li> <li>● Agent told Black tester only about ability to borrow a home equity line of credit after home is owned.</li> <li>● For Black tester, agent recommended a purchase price range of \$180,000-\$250,000, a house payment between \$1,572 and \$2,017, down payment of 20%, no recommended interest rate, and no estimated cash-to-close.</li> <li>● For White tester, agent recommended a purchase price range of \$200,000 to \$350,000, a house payment between \$1,418 and \$2,850, down payment between 10-20%, 4.75% interest rate, and \$5,950 cash-to-close.</li> </ul>
<p style="text-align: center; font-size: 24pt;">6</p>	<ul style="list-style-type: none"> <li>● Agent asked Black tester only for their full name, SSN, and email address.</li> <li>● Agent asked White tester only for their credit information.</li> <li>● Agent recommended the same real estate salesperson to both Black and White testers, but agent told White tester only that they recommend other real estate salespersons for higher end homes outside of the downtown area.</li> <li>● Agent told both Black and White testers that taxes are high in Westnedge Hill neighborhood, but told White tester only that they can save on taxes and still be in KPS if buying in Oshtemo, Kalamazoo, and Texas townships.</li> <li>● Agent told Black tester only that they can accommodate evenings and weekends.</li> </ul>

	<ul style="list-style-type: none"> <li>● Agent told White tester only that part of the loan process is pinpointing an area.</li> <li>● For Black tester, agent recommended a purchase price range of \$250,000 to \$300,000, a house payment between \$1,500 and \$2,000, down payment between 15-20%, 4.75% interest rate, and \$7,500 cash-to-close.</li> <li>● For White tester, agent recommended a purchase price range of \$315,000 to \$350,000, a house payment between \$2,000 and \$2,396, 15% down payment, no estimated interest rate, and \$6,500 cash-to-close.</li> </ul>
7	<ul style="list-style-type: none"> <li>● Agent asked both Black and White testers about their preferred neighborhoods.</li> <li>● For Black tester, agent recommended 3 options: <ul style="list-style-type: none"> <li>○ \$275K purchase price, \$1,520 payment, 20% down payment, 4.5% interest rate, and \$6,357 cash-to-close.</li> <li>○ \$300K purchase price, \$1,739 payment, 15% down payment, 4.5% interest rate, and \$6,422 cash-to-close.</li> <li>○ \$325K purchase price, \$1,850 payment, 15% down payment, 4.5% interest rate, and \$6,461 cash-to-close.</li> </ul> </li> <li>● For White tester, agent recommended 4 options: <ul style="list-style-type: none"> <li>○ \$150K purchase price, \$1,078 payment, 10% down, 4.625% interest rate, and \$4,767 cash-to-close.</li> <li>○ \$175K purchase price, \$1,209 payment, 10% down, 4.625% interest rate, and \$4,869 cash-to-close.</li> <li>○ \$200K purchase price, \$1,345 payment, 10% down, 4.625% interest rate, and \$5,002 cash-to-close.</li> <li>○ \$225K purchase price, \$1,482 payment, 10% down, 4.625% interest rate, and \$5,135 cash-to-close.</li> </ul> </li> </ul>

### Comments

- Two agents made steering comments only to White tester.
- Five agents offered greater access to available dwellings to White testers. Two agents offered greater access to dwellings to Black testers. By offering a higher quote, many more housing options become available to housing seekers.
- Four agents offered additional services to White testers that they did not offer to Black testers.
- Three agents offered a better interest rate to Black testers.
- One agent offered a better interest rate to White tester.
- One agent refused to provide only the Black tester an estimate.
- Three agents offered more detailed information to Black testers.
- Two agents offered more detailed information to White testers.

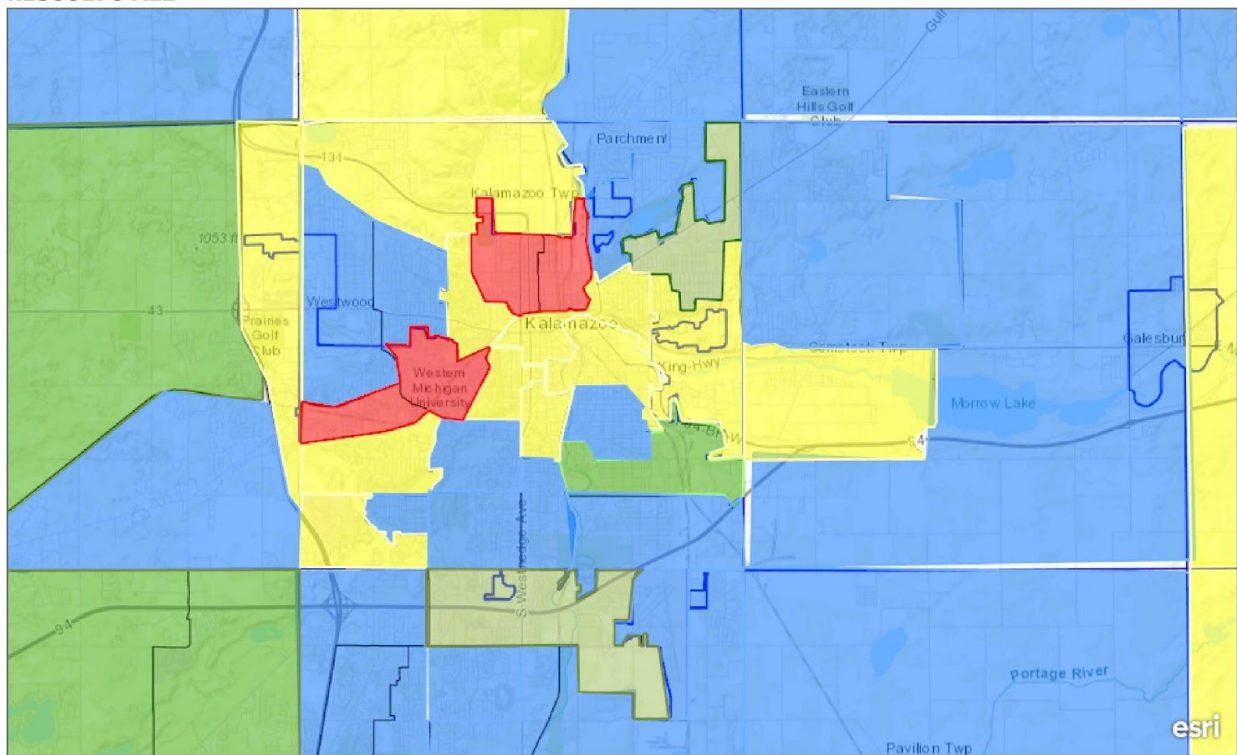
## Home Mortgage Disclosure Act - Agency Specific Data

Agency #	Loans Originated - Race
1	American Indian or Alaska Native - 0.75% Asian - 0.75% Black or African American 4.89% Information Not Provided - 2.65% White - Hispanic or Latino - 1.5% White - Not Hispanic or Latino - 88%
2	American Indian or Alaska Native - 0% Asian - 3.8% Black or African American - 1.27% Information Not Provided - 0.4% White - Hispanic or Latino - 2.53% White - Not Hispanic or Latino - 92%
3	American Indian or Alaska Native - 1% Asian - 1.5% Black or African American - 8.63% Information not Provided - 2% White - Hispanic or Latino - 2.54% White -Not Hispanic or Latino - 83.75%
4	American Indian or Alaska Native - 0.86% Asian - 1.72% Black or African American - 3.45% Information not Provided - 6.9% White - Hispanic or Latino - 3.45% White -Not Hispanic or Latino - 83.6%
5	American Indian or Alaska Native - 0% Asian - 3.7% Black or African American - 0% Information not Provided - 16.7% White - Hispanic or Latino - 0% White -Not Hispanic or Latino - 77.8%
6	American Indian or Alaska Native - 0.36% Asian - 4.32% Black or African American - 2.16% Information not Provided - 1.08% White - Hispanic or Latino - 2.78% White -Not Hispanic or Latino - 88.4%
7	New institution - no data for 2017



## Home Mortgage Disclosure Act - Compiled Data of *Tested Sites*

### Loans Originated - City of Kalamazoo View



### Percentage of All Originating Mortgages in Kalamazoo County

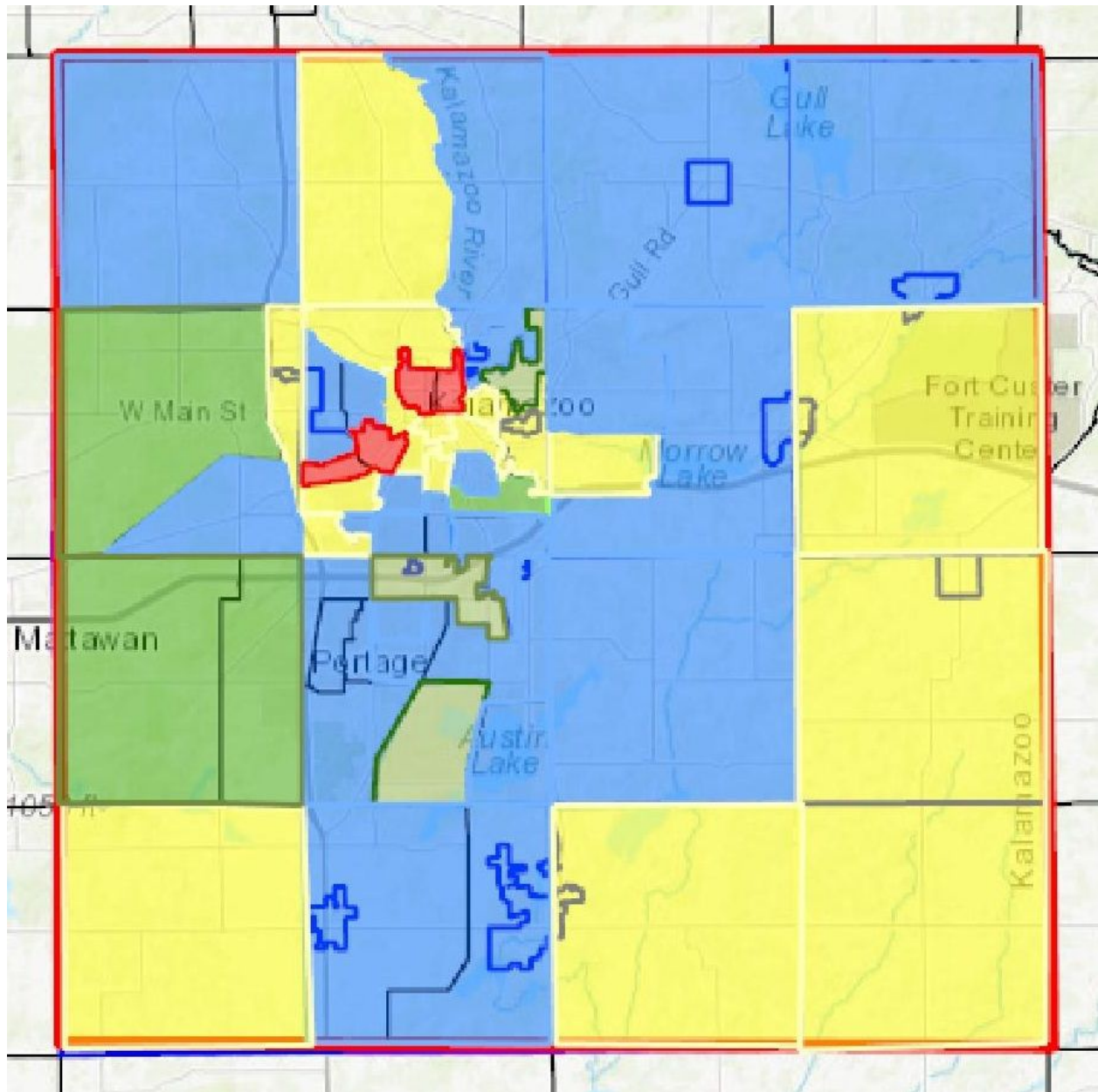
**Green - 3% and greater**

**Blue - 1.01% to 2.83%**

**Yellow - 0.01% - 1.0%**

**Red - no originating mortgages**

## Loans Originated - Kalamazoo County View



### Percentage of All Originating Mortgages in Kalamazoo County

Green - 3% and greater

Blue - 1.01% to 2.83%

Yellow - 0.01% - 1.0%

Red - no originating mortgages

## Compiled HMDA Data of Tested Sites & Compiled Data of all Financial Institutions

For the tested sites, **no** originating mortgages were made to applicants in census tracts 2.02, 3, 15.04, and 15.07.

Census tract 2.02 is composed of 76.2% Black or African American residents, and 10.4% White residents. Owner-occupied housing represents 39% of the total number of housing units. In 2017, **no** originating mortgages were reported from any lending institution.

Census tract 3 is composed of 80.1% Black or African American residents, and 8.5% White residents. Owner-occupied housing represents 27% of the total number of housing units. In 2017, **six** originating mortgages were reported from six lending institutions, including Huntington, Honor Credit Union, Flagstar Bank, Fifth Third, Quicken Loans, and Northern Mortgage Services. Two applicants were Black or African American, two applicants were White, and two were unknown.

Census tract 15.04 is composed of 10.8% Black or African American residents, and 75.9% White residents. Owner-occupied housing represents 15% of the total number of housing units. Census tract 15.04 also contains Western Michigan University's campus. In 2017, **one** originating mortgage was reported from lending institution Lake Michigan Credit Union to a White applicant.

Census tract 15.07 is composed of 14.4% Black or African American residents, and 71.9% White residents. Owner-occupied housing represents 10% of the total number of housing units. In 2017, **eight** originating mortgages were reported from three lending institutions, including Huntington (2), Lake Michigan Credit Union (1), and 21st Mortgage (5). Three applicants were Black, four applicants were White, and one unknown. 21st Mortgage advertises that they specialize in manufactured and mobile home lending.

*Census statistics derived from 2010 U.S. Census data.*

**Minimum Loan Requirements** - For the final part of the lending institution investigation, the Center conducted 12 phone and email tests. Each test was composed of one test part. The purpose of these tests was to gather information on policy and practice of minimum loan amounts required by lending institutions supplying mortgages within the City of Kalamazoo.

Test ID	Summary
k1800170-1	An agent responded to the inquiry and told tester how to apply.
k1800170-2	No agent responded to inquiry.
k1800170-3	An agent responded and said they have no required minimum loan amount, but that there might be obstacles with specific homes.
k1800170-4	No agent responded to inquiry.
k1800170-5	An agent responded and said they have no required minimum loan amount, but the loan must adhere to government regulations for "Qualifying Mortgage" status. The agent went on to explain that the loan cannot be so small that the attendant fees make up too high a percentage of the loan amount. The agent said they do not see Qualifying Mortgage issues until the loan is around the \$20,000 range, though applications are reviewed case by case.
k1800170-6	An agent responded and said they have no required minimum loan amount, but each state may have their own requirements for "high cost" loans. Agent explained that fees are the same regardless of the purchase price. Agent said an person with excellent credit and 20% down payment would get a low purchase price loan much more easily, because they would have better terms and a better rate.
k1800170-7	An agent replied and said they typically have a minimum loan amount for a Mortgage Loan of \$40,000.
k1800170-8	After a second attempt, a customer service agent said that they have no minimum loan requirement, but there may be issues with other costs involved.
k1800170-9	An agent responded and said they do not have a minimum amount for a mortgage, but to keep in mind any repairs each loan program many require would need to be completed prior to close.
k1800170-10	An agent responded and said they can originate mortgages for \$50,000 and up.
k1800170-11	No agent responded to inquiry.
k1800170-12	An agent responded and said they have no minimum loan amount required.

# Real Estate Sales Investigation

**Background** - The Fair Housing Act prohibits discrimination in the sale, rental, and financing of residential dwellings, and in other residential real estate related transactions, based on race, color, national origin, religion, sex, familial status, and disability (protected classes). For this investigation, the City of Kalamazoo contracted with the Fair Housing Center of Southwest Michigan to investigate discrimination in real estate sales on the basis of race.

A real estate salesperson commits discriminatory sales practices when they take the following actions based on a client's membership in a protected class:

- Refuses to sell after the making of a bona fide offer
- Refuses to negotiate in the sale of a dwelling
- Makes unavailable the sale of a dwelling
- Discriminates in the terms, conditions, or privileges of sale of a dwelling
- Makes, prints, or publishes (or causes to be made, printed, or published), any notice, statement, or advertisement, with respect to the sale of a dwelling that indicates and preference, limitation, or discrimination.
- Falsely represents availability of sale of a dwelling

Currently, and during the time of this investigation, most of the United States and in the City of Kalamazoo, real estate sales are at a peak. Therefore, overall access to available dwellings, regardless of race, is very low in comparison to the previous 10 years.

**Methodology of Investigation** - For each test, two testers were assigned, one Black tester, one White tester. Both testers were assigned to visit a real estate agent and gather information and evidence on the service, treatment, and access to available dwellings. The purpose of these paired tests was to determine whether comparably qualified Black and White prospective real estate sales consumers receive the same information, service, treatment, and access to available dwellings.

Both Black and White tester profiles were composed of two gainfully employed individuals, husband and wife, and one child. Both Black and White tester profiles included employment at Kalamazoo's major companies, and positions that pay at or above median income for Kalamazoo-Metro area. Both Black and White testers were prequalified for a home purchase. Both Black and White testers are looking to purchase a home that is Kalamazoo Promise eligible. Both testers were looking for the same type of home, with the same amount of bedrooms. In fact, the only difference between the Black and White tester profiles is the Black tester was prequalified for a higher amount.

Structuring the investigation in such a way is meant to rule out potential discrimination on the basis of a client's qualifications. If real estate salespersons consider only testers' specified preferences and indications, of home description and pre approval amount, then Black testers should receive more access to available dwellings.

**Table of Analysis** - In the following table, the eight separate agents investigated are analyzed. Agents are labeled as A, B, C...and so on, in an effort to maintain anonymity. The table outlines the differences of service, treatment, and access to available dwellings experienced by Black and White testers. For some tests, testers followed up with agents requesting additional options.

Note: for all agencies, testers met with the same agent.

<b>Service, Treatment, and Access</b>	
<b>Agent</b>	<b>Summary of Differences</b>
<b>A</b>	<ul style="list-style-type: none"> <li>● Agent only asked Black tester the following questions: Are you pre approved? Pre approved at this price? Where are you from? Do you work locally? Are you married with kids? Who is your lending agent? Where did you go to school? How old are you?</li> <li>● Agent only asked White tester the following question: Are you looking at other homes?</li> </ul>
<b>B</b>	<ul style="list-style-type: none"> <li>● Agent only asked Black tester if they are in Kalamazoo for School.</li> <li>● Agent only asked White tester if they are looking at other properties, and which School District they prefer.</li> <li>● Black tester received 21 additional listings located in Zip Codes: 49001, 49008 (5), 49006 (4), 49004 (3), 49009 (8)</li> <li>● White tester received 6 additional listings located in Zip Codes: 49008 (5), and 49006.</li> <li>● All 6 listings received by White tester were also received by Black tester.</li> </ul>
<b>C</b>	<ul style="list-style-type: none"> <li>● Agent only asked Black tester the following questions: Age of child? Kalamazoo Promise Area?</li> <li>● Agent only asked White tester the following questions: When are you ready to purchase? What is your price range?</li> <li>● Agent suggested to Black tester that it is a really good investment house to flip.</li> <li>● Agent offered to White tester only: to show a couple of homes after the open house, and to show tester more homes during a future weekend.</li> <li>● Black tester received 7 additional listings located in Zip Codes: 49001, 49009 (2), 49008 (3), 49006.</li> <li>● White tester received 26 additional listings located in Zip Codes: 49009 (5), 49008 (4), 49004 (2), 49080 (3), 49071, 49009 (2), 49079, 49024 (2), 49002 (4), 49083.</li> <li>● Agent emailed both Black and White testers 3 similar listings located in Zip Codes: 49001, and 49008 (2)</li> </ul>
<b>D</b>	<ul style="list-style-type: none"> <li>● Agent only asked Black tester the following questions: Are you from this area? Are you working with a lender? Are you currently living in Kalamazoo?</li> <li>● Agent only asked White tester the following questions: Is this the area you want to live in?</li> <li>● Agent informed both Black and White testers about the property's income potential and that it is a duplex.</li> </ul>

	<ul style="list-style-type: none"> <li>● Agent offered to show Black tester’s fiance the house on a later date.</li> <li>● Agent told White tester only about the potential to negotiate the sales price.</li> <li>● Agent told White tester about their website that makes it easy to track and communicate about different listings.</li> </ul> <p>Note: this property is located in Stuart/Northside Neighborhood.  Note: White tester disclosed that he was working with a lender.</p>
E	<ul style="list-style-type: none"> <li>● Agent discussed with Black tester only: When are you getting married? Inventory will be better in Spring. It is a great “starter home”. Lots of people interested.</li> <li>● Agent offered with White tester only: additional properties that were re-listed.</li> <li>● Agent did not respond to Black tester’s follow-up email.</li> <li>● Agent did respond to White tester’s follow-up email.</li> <li>● Agent did not respond to Black tester’s follow up email.</li> <li>● Agent replied to White tester’s follow up email, offering several new listings in addition to re-listed properties.</li> </ul>
F	<ul style="list-style-type: none"> <li>● Agent discussed financing with Black tester only, implying it would be necessary to move forward</li> <li>● Agent provided more details about the house and its construction to Black tester</li> <li>● Agent did not reply to Black or White testers’ follow up email.</li> </ul>
G	<ul style="list-style-type: none"> <li>● Agent asked White tester only if they are moving to the area, or moving up.</li> <li>● Agent called White tester to get more information about what they are looking for in a house.</li> <li>● Black tester received 54 additional listings located in Zip Codes: 49009 (11), 49006 (11), 49004 (7), 49008 (10), 49001 (11), 49048 (5).</li> <li>● White tester received 57 additional listings located in Zip Codes: 49004 (5), 49009 (8), 49001 (14), 49048 (7), 49008 (7), 49007 (4), 49006 (12).</li> <li>● Agent emailed both Black and White testers 37 similar listings located in Zip Codes: 49009 (7), 49006 (10), 49004 (4), 49008 (3), 49001 (10), 49048 (3).</li> </ul>
H	No differences determined. Agent did not reply to Black or White testers’ follow up email.

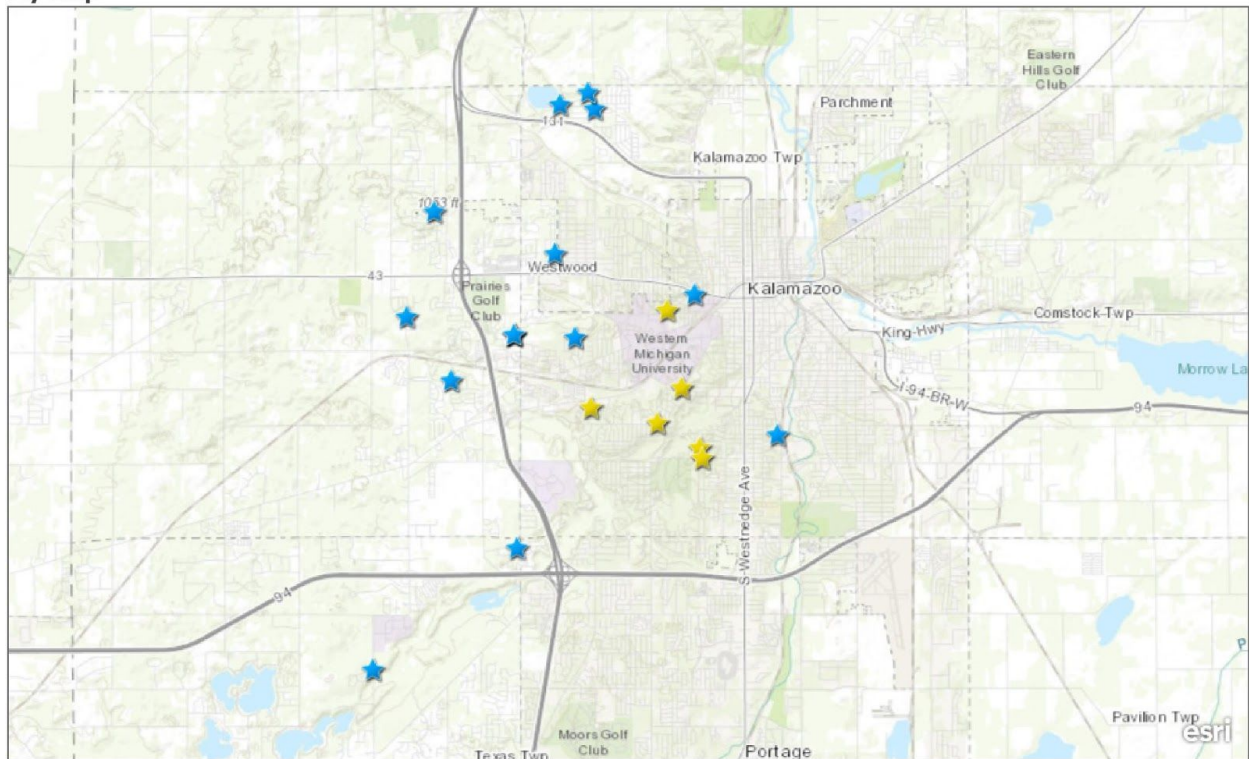
**Comments**

- Three agents brought up pre-approval with the Black tester, and did not bring up pre-approval with the White tester.
- Two agents asked White tester probing questions, asking if they are looking for additional dwellings.
- Two agents asked White tester what area/school district they prefer. One agent asked Black tester if they are looking for a Kalamazoo Promise home.
- Three agents asked the Black tester where they are from. One agent asked White tester if they are moving to the area.

- Three agents offered immediate access to additional dwellings to the White tester only.
- One agent discussed ability to negotiate the sale of the dwelling with the White tester only.
- Black testers received 82 additional listings total, White testers received 89 additional listings total.
- Black and White testers received 46 additional listings total.
- One agent replied to White tester's follow-up email and did not follow-up with Black tester's email.
- One agent called White tester only to get additional information before sending more listings.
- Black testers received listings in 6 different zip codes
- White testers received listings in 12 different zip codes

## Case by Case Maps - Real Estate Sales

k1800133CD

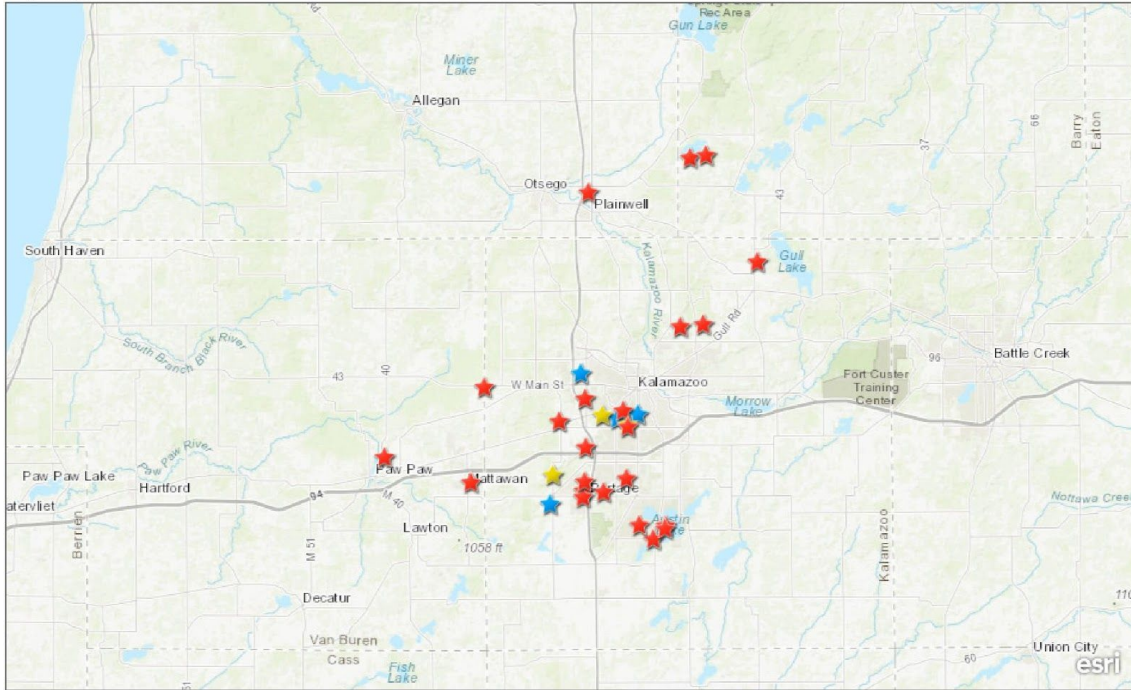


**Blue Star - Black Listings**

**Yellow Star - Similar Listings**

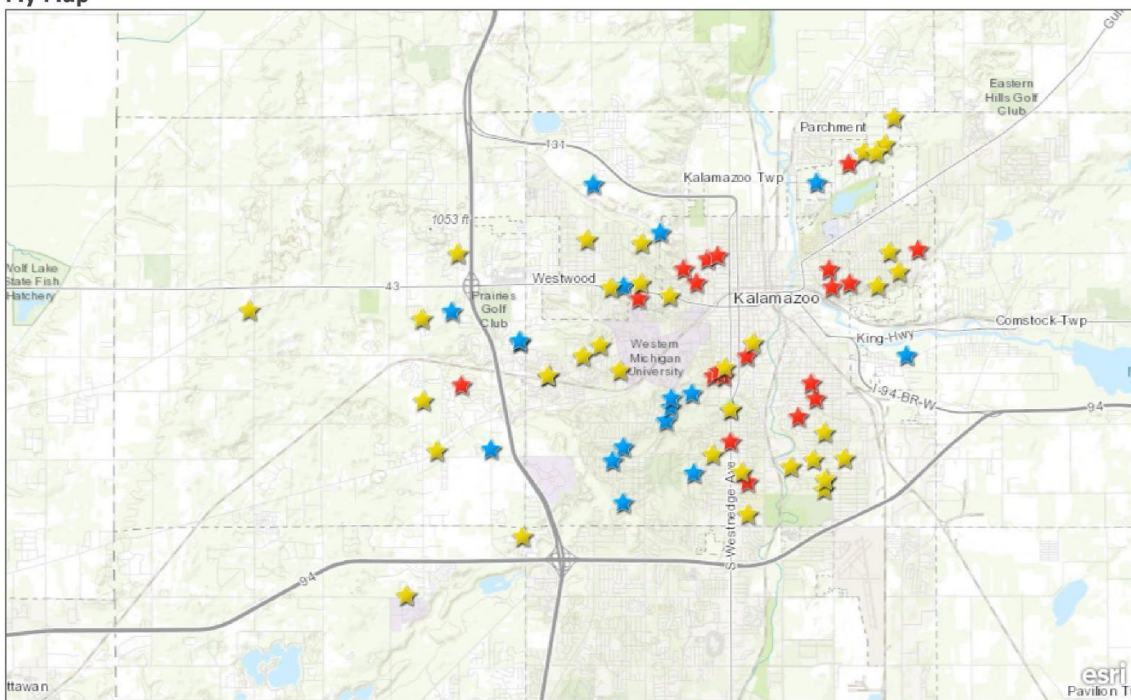


k1800133EF



Blue Star - Black Listings; Red Star - White Listings; Yellow Star - Similar Listings

k1800133UV



**Data Suppression Notes:**

<b>OTHER</b>	
<b>Test ID</b>	<b>Summary</b>
k1800170IJ	TEST ERROR
k1800170KL	TEST ERROR

*Test Error: only one tester was able to meet with mortgage loan officer.*

<b>Other</b>	
<b>Test ID</b>	<b>Information</b>
k18000133GH	TEST ERROR
k1800133KL	TEST ERROR
k1800133OP	TEST ERROR
k1800133QR	TEST ERROR
k1800133YZ	TEST ERROR

*Examples of test errors include unpredictable situations where only one or no tester was able to make contact with an agent. This can occur if a mistake is made by tester, but is generally due to a cancellation or change of schedule made by the agent made before meeting both testers in person.*

<b>Lending Institutions</b>		<b>Real Estate Sales</b>	
<b>Chart ID</b>	<b>Test #</b>	<b>Chart ID</b>	<b>Test #</b>
<b>1</b>	k1800170AB	<b>A</b>	k1800133AB
<b>2</b>	k1800170CD	<b>B</b>	k1800133CD
<b>3</b>	k1800170EF	<b>C</b>	k1800133EF
<b>4</b>	k1800170GH	<b>D</b>	k1800133IJ
<b>5</b>	k1800170MN	<b>E</b>	k1800133MN
<b>6</b>	k1700170OP	<b>F</b>	k1800133ST
<b>7</b>	k1800170QR	<b>G</b>	k1800133UV
		<b>H</b>	k1800133WX

