



U.S. Department of Justice

Civil Division
Federal Programs Branch
20 Massachusetts Avenue N.W. Rm 7214
Washington, DC 20530

Catherine H. Gibson
Trial Attorney

Tel: (202) 305-8613
Fax: (202) 616-8470

February 24, 2011

VIA ELECTRONIC MAIL

Paul J. Orfanedes, Esq.
Julie B. Axelrod, Esq.
Judicial Watch
425 3rd Street, S.W.
Suite 800
Washington, D.C. 20024

Re: *Judicial Watch v. Department of Justice*, 1:10cv1783 (D.D.C.)

Dear Julie:

Pursuant to the Court's Scheduling Order of December 30, 2010, I enclose a letter from the Civil Rights Division and documents responsive to your Freedom of Information Act request related to United States v. AIG Federal Saving Bank and Wilmington Finance that Defendant asserts are not exempt from production under FOIA.

If you have any questions about the enclosed materials, please do not hesitate to contact me at (202) 305-8613.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine H. Gibson".

CATHERINE H. GIBSON
Trial Attorney
Federal Programs Branch
Civil Division

Enclosures

settlements,² and the case law in that context establishes the appropriateness of such distributions in a context, like fair housing, fair lending and accessibility cases, where compensation of victims and deterrence are purposes of the underlying statutes. **During the period from the early 1990s until 2004 and then again since Fall 2009,** the Division has entered into such court-ordered settlements. Under the Division's current practice, the defendants propose the organization that would receive unclaimed funds, and if the United States approves, the parties jointly submit the defendant's proposal to the court for final approval.

From May 2004 to the fall of 2009, the Division followed a different practice, including in its consent orders the requirement that any unclaimed settlement funds must revert to the defendants.

In the fall of 2009, the Division returned to its longstanding practice of distributing the remaining funds to further the purposes of the consent order and the underlying statutes. At the same time, the Division also resumed its practice of consistently entering into consent decrees with requirements for defendants to establish consumer financial education funds in its fair lending settlements. The Division views these funds as important and effective remedial measures, in light of the well-documented fact that the lending process is a complicated one, even for educated consumers. As a result, improved financial literacy and increased information about the lending process can help protect consumers from becoming the victims of lending discrimination.³

Since the Division's return in the fall of 2009 to the policy of distributing settlement fund remainders to organizations that further the goals of the consent order and underlying statutes, the Division has entered into a total of 3 consent decrees that require the payment of left-over funds to be distributed to third party organizations:⁴

to which disbursements may be paid to further the goals of the consent decree, relevant case law guides our determination of the appropriate form and amount of relief.

² In the class action context, a *cy pres* distribution refers to a procedure whereby the "the court, guided by the parties' original purpose, directs that the unclaimed funds be distributed 'for the indirect prospective benefit of the class.'" See *Powell v. Georgia-Pacific Corp.*, 119 F.3d 703, 706 (8th Cir. 1997) (quoting 2 Newberg and A. Conte, *Newberg on Class Actions*, Sect. 10.17 at 10-41 (3d. Ed. 1992)).

³ See, e.g., http://islandia.law.yale.edu/ayres/forbes_0609.html See also Ian Ayres, *Further Evidence of Discrimination in New Car Negotiations and Estimates of Its Cause*, 94 *Mich. L. Rev.* 109 (1995); Ian Ayers & Peter Siegelman, *Race and Gender Discrimination in Bargaining for a New Car*, 85 *Am. Econ. Rev.* 304 (1995).

⁴ The Section has entered into numerous other pattern or practice consent decrees since the fall of 2009, but in those cases, either all the victims were identified in the decree itself leaving no need for a victim fund, or the decree was negotiated primarily between 2004 and Fall 2009, when the policy of returning unclaimed settlement funds to defendants remained in effect.

- In *United States v. QuikTrip Corporation*, the Division reached a comprehensive settlement under the Americans with Disabilities Act with QuikTrip Corporation, a private company that owns and operates more than 550 gas stations, convenience stores, travel centers, and truck stops in the Midwest, South and Southwestern United States. Under the consent decree, QuikTrip will create a \$1.5 million compensatory damages fund for individuals who were victims of discrimination based on disability. Any remaining funds unclaimed by victims will be paid to non-profit organizations serving the interests of individuals with disabilities. Two organizations were designated to receive any remaining funds: Wounded Warriors, an organization serving disabled veterans, and Centers for Independent Living.
- In *United States v. Sterling* (C.D. Cal.) \$40,000 of the \$2,625,000 victim fund will be divided between the victim fund administrator and the Southern California Housing Rights Center. The Housing Rights Center was chosen pursuant to a provision in the *Sterling* consent decree, which directed that any money remaining in the fund after all victims of discrimination have been compensated should be disbursed to a qualified organization mutually agreed upon by the United States and Defendants, subject to the approval of the Court, for the purpose of conducting fair housing enforcement or educational activities in Los Angeles County, with a particular focus on the City of Los Angeles. The Housing Rights Center is a well-established fair housing organization that is not affiliated with ACORN. While the *Sterling* consent order does not provide for any specific reporting or auditing requirements for the \$40,000 disbursement, as a recipient of a FY 2009 Fair Housing Initiatives Program (FHIP) Award from the Department of Housing and Urban Development (HUD), the Housing Rights Center's programs are monitored by HUD.
- In *United States v. AIG Federal Savings Bank* (D. Del.),⁵ as your letter notes, the consent decree requires defendants to provide a minimum of \$1 million, including any money remaining in the victim fund after all victims of discrimination are compensated, to qualified organizations to provide credit counseling, financial literacy, and other related educational programs. The *AIG Federal Savings Bank* consumer education funds have not yet been disbursed. The provisions in our consent decrees requiring funding for consumer financial education are discussed more fully below.
- During calendar years 2008, 2009 and 2010 as of July 29, 2010, a total of \$12,848,500 has been paid into settlement funds in pattern or practice cases brought under the Fair Housing Act and ECOA. Of this amount, \$4,980,000 has been paid to individual victims of discrimination by defendants; \$226,500 has been returned to

⁵ The complaints and consent orders in these cases, as well as all other Division cases referenced in this letter, are available at <http://www.justice.gov/crt/housing/fairhousing/caseslist.htm>.

defendants; \$40,000 has been distributed to an outside organization (see above); and the remaining \$7,602,000 is pending distribution.⁶

Your letter also references two recent fair lending cases in which the consent orders require the defendants to fund specified levels of consumer financial education. In *United States v. Nara Bank, et al.* (C.D. Cal.), the consent order provides that the defendant shall dedicate "at least 400 staff hours" to an ongoing financial literacy training effort and shall maintain a financial commitment of "at least One Hundred Thousand Dollars" each year of the agreement to a combination of specified financial education programs. The *AIG Federal Savings Bank* consent order also provides that the defendants shall propose the organizations that will receive these funds, shall consult with the United States and shall obtain Court approval for distribution of the fund. As with all of the Division's cases, the specific terms of the consent order, including the order's provisions for selecting organizations to receive the funds, were negotiated between the parties in the context of the entire consent order. In both of these cases, the consent orders build on defendants' pre-existing consumer financial education commitments in an effort to achieve the maximum efficiency and effectiveness for these programs.

We are confident that in neither case is there any danger that the consumer financial education requirements will divert funds from identified individual victims who can be located. In the *Nara Bank* case, the financial literacy provisions are entirely separate from the victim compensation fund, and in the *AIG FSB* case, the consent order specifically provides that any remainder in the settlement fund that is used for consumer financial education purposes shall be distributed only after all of the efforts to identify and compensate individual victims are completed. Further, in fair lending settlements involving defendants that are depository institutions supervised by federal bank regulatory agencies, the Division has a long history of working cooperatively with those agencies to ensure appropriate oversight of the defendant banks in implementing and executing the programs required by the consent orders.

In sum, the policy change of 2009 reflected a return to the longstanding practice that had been in effect in the Division since the early 1990s. The practice was and continues to be successful in fostering the goals of our civil rights laws and preventing further violations through education. We are confident that the programs are administered appropriately and do not divert compensation intended for victims.

⁶ Your letter asks whether, prior to the selection of an organization for distribution from a settlement fund remainder, the Division consults with the Office for Victims of Crime within the Department of Justice's Office of Justice Programs. The Office for Victims of Crime administers the Crime Victims Fund, a fund that provides money for states and victim assistance programs that compensate and assist victims of crimes such as domestic violence, child abuse, and sexual assault. The Division does not engage in such consultation, but rather consults with other agencies and organizations engaged directly in work related to the statutes underlying our cases, in order to draw on resources and expertise in the areas directly related to the remedial issues in those cases.

The Honorable Charles E. Grassley
Page 5

We hope this information is helpful. Please do not hesitate to contact this office if we may be of further assistance with this, or any other matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Keith Burton for".

Ronald Weich
Assistant Attorney General

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, Plaintiff,)
)
 v.)
)
AIG FEDERAL SAVINGS BANK and)
WILMINGTON FINANCE, INC.,)
Defendants.)
_____)

No. 10cv178-JJF

CONSENT ORDER

I. INTRODUCTION

This Consent Order (Order) is submitted jointly by the parties for the approval of and entry by the Court simultaneously with the filing of the United States' complaint (Complaint) in this action. The Order resolves the claims of the United States that the Defendants, AIG Federal Savings Bank (AIG FSB) and Wilmington Finance, Inc. (WFI), (collectively, "Defendants") have engaged in a pattern or practice of conduct in violation of the Fair Housing Act (FHA), 42 U.S.C. §§ 3601-3619, and the Equal Credit Opportunity Act (ECOA), 15 U.S.C. §§ 1691-1691f, by allowing wholesale mortgage brokers¹ to charge African-American borrowers higher direct broker fees for residential real estate-related loans than white borrowers. Defendants deny these allegations. The parties submit this Order to resolve fully and finally all claims asserted or that could have been asserted arising out of or relating to the matters referred to in the Complaint.

¹ For purposes of this Order, wholesale mortgage brokers are independent third-party entities in which the Defendants have no ownership interest and no exclusive relationship, who act as an intermediary with borrowers to procure home-mortgage loan applications for funding by Defendants, and who are paid a fee directly by borrowers for such services. The wholesale mortgage brokers at issue in this lawsuit entered into broker agreements with one or both Defendants regarding their procurement of home-mortgage loan applications for funding by a Defendant.

Defendants AIG FSB and WFI represent that they have ceased their wholesale home-mortgage lending operations in 2006 and 2008, respectively, and WFI represents that it is currently winding down its business operations. Under the provisions of this Order, the Defendants agree that if either Defendant re-enters the wholesale lending business, that Defendant will implement policies and procedures designed to ensure that direct broker fees for their residential loan products are assessed in a nondiscriminatory manner consistent with the requirements of the FHA and ECOA. In addition, Defendants will compensate certain African-American borrowers based on an agreed upon formula to identify such borrowers by reference to, among other factors, the direct mortgage broker fees they paid.

There has been no factual finding or adjudication with respect to any matter alleged by the United States. The parties have entered into this Order to avoid the risks and burdens of litigation, and to resolve voluntarily the claims in the United States' Complaint relating to Defendants' alleged violations of fair-lending laws. The parties agree that full implementation of the terms of this Order will provide a fair and reasonable resolution of the claims of the United States in a manner consistent with the Defendants' legitimate business interests.

II. BACKGROUND

AIG FSB is a wholly-owned subsidiary of American International Group, Inc. It is a federal savings bank with its principal place of business at One Alico Plaza, 600 King Street, Wilmington, Delaware. WFI is a wholly-owned subsidiary of American International Group, Inc. It is a Delaware corporation with its principal place of business at 401 Plymouth Road, Plymouth Meeting, Pennsylvania. Between approximately July 2003 and May 2006, pursuant to an agreement between AIG FSB and WFI, WFI provided various services for loans that were made and funded by AIG FSB.

In 2006 and 2007 the Office of Thrift Supervision (OTS) conducted examinations of the lending practices of AIG FSB to evaluate compliance with, among other laws, the FHA and the ECOA. Based on analysis of 2005 HMDA lending data, the OTS found reason to believe that AIG FSB had displayed a pattern or practice of charging minority borrowers higher broker fees than similarly situated non-minority borrowers. The OTS referred this matter to the United States Department of Justice (DOJ) for appropriate enforcement pursuant to 15 U.S.C. § 1691e(g).

The United States contends that Defendants engaged in a pattern or practice of discrimination on the basis of race or color by allowing wholesale mortgage brokers to charge higher direct broker fees² to African-American borrowers than to white borrowers for loans originated and funded by AIG FSB and/or WFI. The Defendants deny all allegations and claims of discrimination on both factual and legal grounds and maintain that at all times they conducted their lending and other activities in compliance with the fair-lending laws. There has been no factual or legal finding or adjudication with respect to any matter alleged by the United States. Accordingly, the entry of this Order is not, and is not to be construed as, a precedent, admission, or finding of any violation of the FHA or the ECOA by the Defendants. Rather, both parties have agreed to the entry of this Order to resolve voluntarily the claims asserted by the United States in order to avoid the costs, risks, and burdens of litigation.

III. REMEDIAL ORDER

A. General Nondiscrimination Injunction

² "Direct" broker fees (sometimes called "up-front" broker fees) means fees paid directly by the borrower to the broker for services rendered by the broker to the borrower in connection with securing a real estate-related loan. A borrower typically pays these fees at closing either with cash brought to the closing, or out of the loan proceeds. Direct broker fees do not include amounts paid by the lender to the broker or miscellaneous fees, such as appraisal costs and title searches.

1. The Defendants, including all of their officers, employees, agents, assignees, successors in interest, and all those in active concert or participation with any of them, are hereby enjoined from engaging in any act or practice in wholesale home mortgage lending that discriminates on the basis of race or color in any aspect of a residential real estate-related transaction in violation of the Fair Housing Act, 42 U.S.C. §§ 3604 and 3605, or in any aspect of a credit transaction in violation of the Equal Credit Opportunity Act, 15 U.S.C. § 1691(a)(1). This prohibition includes, but is not limited to, the adoption, performance, or implementation of any policy, practice, or act that results in race or color discrimination against residential mortgagors in the assessment of direct mortgage broker fees.

2. Unless otherwise stated herein, the remedial provisions of this Order shall be implemented within thirty days of the effective date of this Order and shall continue throughout its term. The effective date of this Order shall be the date on which it is approved and entered by the Court.

B. Applicability of Specific Provisions

3. Each Defendant represents that it is not currently in the business of wholesale home-mortgage lending³ and has no plans to re-enter this line of business. Moreover, AIG FSB represents that it currently maintains at least annual fair-lending training appropriate to the nature of its lending activities. AIG FSB shall maintain during the period of this Order at least annual fair lending training appropriate to the nature of its lending activities and regarding the requirements of the FHA and ECOA. Based on the representations and obligations above, the provisions of paragraphs 4-9 shall apply to each Defendant, and to each Defendant's officers, employees, agents, and representatives and all those in active concert or participation with any of

³ "Wholesale home-mortgage lending" means providing home-mortgage loans in conjunction with wholesale mortgage brokers acting as an intermediary with the borrower.

them with respect to wholesale home-mortgage lending operations, only if that Defendant re-enters the business of wholesale home-mortgage lending during the term of this Order. In the event of such re-entry, the Defendant must notify the United States within thirty days of re-entry, and paragraphs 4-9 must be implemented within ninety days of re-entry.

C. Pricing Policy and Procedures

4. AIG FSB and WFI shall each develop and implement, as part of a loan-pricing policy, specific, nonracial standards for the assessment of direct broker fees on residential real estate-related loans that AIG FSB or WFI underwrites, originates, or funds that are designed to avoid unlawful race discrimination by the Defendants. The loan pricing policy shall also require written documentation of such fees be maintained in each loan file and be among the application documents submitted to either Defendant. These requirements shall be made part of any broker agreement between a wholesale mortgage broker and either Defendant. AIG FSB and WFI have represented that when they have engaged in the wholesale home-mortgage lending business they had in place limits on the amount of yield-spread premiums (YSPs) that may be earned by mortgage brokers on loans. Defendants also shall incorporate YSP limits into their loan-pricing policies.

5. Defendants' loan-pricing policies shall require them to post and prominently display in each location where loan applications are received by the Defendant a notice of non-discrimination (a sample of which is attached as Exhibit A). Defendants shall impose the posting requirements described in this paragraph on all brokers who submit loan applications to the Defendants.

6. Defendants' policy shall require brokers to make the following disclosures to applicants, to the extent not inconsistent with applicable law: (a) the full amount of the direct broker fee, any YSP and all other forms of broker compensation, and that such compensation

may or may not be negotiable between the broker and borrower, and (b) a notice of non-discrimination that provides substantially the same information as is contained in Appendix A. Such disclosures shall be in writing, signed by the broker and the borrower (if the borrower executes), and submitted by the broker to be made part of the loan file by AIG FSB or WFI. This disclosure shall be made as early as practicable but not later than 48 hours prior to the closing of the loan.

7. Defendants' loan-pricing policies shall require all wholesale mortgage brokers from whom they accept wholesale home-mortgage loan applications to comply with the requirements established in paragraphs 4-6. Defendants' policies shall also require an appropriate manager, under the supervision of a designated senior official of AIG FSB or WFI, to review applications received from wholesale mortgage brokers for compliance with loan-pricing policies. Any loan that is not in compliance with the pricing policy may not be funded. All reviews shall be documented and kept in the loan file.

D. Monitoring Program

8. Each Defendant shall develop and implement direct broker-fee monitoring programs designed to ensure compliance with this Order. The programs shall be designed to monitor loans sourced through wholesale mortgage brokers and funded by AIG FSB or WFI for potential racial disparities in direct broker-fee levels. Each program also shall require a quarterly review by senior managers of the Defendant with respect to all wholesale home-mortgage loans originated during the preceding quarter by that Defendant. Each such quarterly review shall be documented and presented to the Defendant's respective Board for review and approval not later than sixty days after the end of each quarter. Each quarterly review shall include, but not be limited to, a direct broker-fee analysis designed to detect significant race disparities in such fees with respect to all wholesale loans funded by the Defendant.

a. In the event that any such review discloses significant disparities, the Defendant in question shall attempt to determine the reason(s) for those disparities (if any) and shall promptly take corrective action to address significant disparities that were attributable to a policy or practice of the Defendant, and not justified by legitimate business need. Corrective action shall include, as warranted, financial remediation for borrowers, modifications to the Defendant's pricing policies and/or monitoring programs as appropriate, and modification or termination of broker relationship(s). Defendant shall document all such disparities, determinations, and actions taken and shall provide the quarterly reviews and any documentation and analysis relating thereto to the United States on a quarterly basis.

b. In the event that any such review discloses significant disparities with respect to any particular broker's direct broker fee pricing practices, the Defendant shall require the broker to explain the non-discriminatory reason(s) for those disparities. If there is no reasonable, nonracial explanation for the noted disparities, Defendant shall undertake good faith efforts to require the broker to take prompt corrective action to address the disparities.

If the United States raises any objections to the Defendant's determinations or remedial actions, Defendant and the United States shall meet and confer to consider appropriate steps to address the concerns raised by the United States' review. If the parties are unable to come to an agreement regarding such objections, any party may bring the dispute to this Court for resolution. In that event, the fact that a Defendant's policies and monitoring programs were not objected to by the United States under paragraph 9 of the Order shall be relevant to determining the proper course of action.

E. Notification to the United States and Right to Object

9. Each Defendant shall provide a copy of the loan policies required under paragraphs 4-7 and descriptions of the monitoring programs required under paragraph 8, to counsel for the United States within ninety days of any return to the business of wholesale home-mortgage lending by that Defendant.⁴ The United States shall have thirty days from receipt of these documents from each Defendant to raise any objections to the relevant Defendant's policies and programs, and, if it raises any, the parties shall confer to resolve their differences. In the event they are unable to do so, any party may bring the dispute to this Court for resolution. Until the Court resolves such a dispute, the disputed policies and programs will not go into effect. Subsequent proposed material revisions to these policies and programs, pursuant to paragraphs 7 and 8 or otherwise, shall be submitted to the United States for objection and resolution in the manner provided for in this paragraph.

F. Consumer Education

10. Through the funding mechanism set forth in paragraph 21, Defendants shall provide a minimum of \$1,000,000 to qualified organization(s) to provide credit counseling, financial literacy, and other related educational programs targeted at African-American borrowers. The Defendants will consult with and obtain the non-objection of the United States in selecting recipient(s) of these funds, and the parties shall obtain the Court's approval prior to distribution of the fund.

G. Equal Credit Opportunity Training Program

⁴ All material required by this Order to be sent to counsel for the United States shall be sent by commercial overnight delivery service addressed as follows: Chief, Housing and Civil Enforcement Section, Civil Rights Division, U.S. Department of Justice, 1800 G Street NW, Washington, DC 20006, Attn: DJ 188-15-11, or by facsimile to 202-514-1116.

11. Each Defendant shall, at least annually, provide training with respect to their responsibilities and obligations under the FHA, the ECOA, and this Order to all management officials, loan officers, and any other employees, or agents who: (a) participate in the pricing of wholesale home-mortgage real-estate loans, or (b) have significant involvement in wholesale home-mortgage lending, including contact with or oversight of brokers. In the event that either Defendant re-enters the business of wholesale home-mortgage lending, that Defendant shall provide training within 30 days after that Defendant's new loan policy is implemented, and during this training, each Defendant shall provide to each participant: (a) a copy of this Order and of the relevant Defendant's new loan pricing policy; and (b) training on the terms of this Order, the relevant new loan pricing policy, the requirements of the Fair Housing and Equal Credit Opportunity Acts, and his or her responsibilities under each.

12. In the event that either Defendant re-enters the wholesale home-mortgage lending business, that Defendant shall secure from each employee or agent specified in the preceding paragraph a signed statement acknowledging that he or she has received a copy of this Order and the loan pricing policy and has completed the initial equal credit opportunity training. These statements shall be substantially in the form of Appendix B (Acknowledgment) and Appendix C (Equal Credit Opportunity Training). During the term of the Order, each new employee or agent whose responsibilities include those set forth in paragraph 11, shall be provided a copy of this Order and given an opportunity to have any questions answered, and shall sign the acknowledgment form statement (Appendix B) within ten days of beginning his or her employment in that position. Defendants shall retain these statements for the duration of the Order, and make them available to the United States upon request.

13. In the event that either Defendant re-enters the wholesale home-mortgage lending business, that Defendant shall offer all brokers from whom it accepts wholesale home-mortgage loan applications the opportunity to undergo fair lending training similar to the training described in paragraph 11 of this Order. Defendants shall retain documentation of any training or requests for training for the duration of the Order, and make such documentation available to the United States upon request.

14. In the event that either Defendant re-enters the wholesale home-mortgage lending business, the training required by this Section shall be conducted by independent qualified third parties approved in advance by the United States. Any expenses associated with this training program shall be borne by the Defendant re-entering the business.

H. Satisfaction of United States' Claims for Monetary Relief

15. Defendants shall deposit in an interest-bearing escrow account the total sum of \$6.1 million for the purpose of paying damages to aggrieved persons who may have suffered as a result of the alleged violations of the Fair Housing and Equal Credit Opportunity Acts (the "Settlement Fund"). The Defendants shall provide written verification of the deposit to the United States within five days of the effective date of this Order. Any interest that accrues shall become part of the Settlement Fund and be utilized and disposed of as set forth herein.

16. Within 30 days of the effective date of this Order, the United States shall request any information it believes will assist in identifying aggrieved persons and determining any damages. Defendants shall, within 15 days, supply, to the extent that it is within their control, such information as requested. Requested data may be supplied as a supplement to the database already provided to the United States by Defendants in the course of the United States' investigation.

17. The United States shall, upon reasonable notice, be allowed access to the Defendants' records and files to verify the accuracy of the data provided and to otherwise identify persons entitled to the payments from the Settlement Fund.

18. Within 90 days of the Effective Date of this Consent Order, the United States shall provide to Defendants a list of aggrieved persons and an amount each individual shall receive from the Settlement Fund to compensate for both economic and non-economic damages these persons may have suffered, subject to the conditions set forth in paragraph 19 below. Defendants shall have fifteen days in which to review the list and the United States shall consider in good faith any issues raised by Defendants.

19. Payments from the Settlement Fund to aggrieved persons shall be subject to the following conditions, provided that the details in administration of the Settlement Fund set forth in paragraphs 16, 17, 18, and 20, can be modified by agreement of the parties and without further Court approval:

(a) No aggrieved person shall be paid any amount from the Settlement Fund until he or she has executed and delivered to Defendants a written release, as set forth in Appendix D, of all claims, legal or equitable, that he or she might have against the released persons and entities regarding the claims asserted by the United States in this lawsuit, so long as such claims accrued prior to the entry of this Order; and

(b) No person shall be eligible for payment from the Settlement Fund with respect to a loan if such person has previously received remediation with respect to such loan and has executed a release in exchange for such remediation; and

(c) The total amount paid by the Defendants collectively to the aggrieved persons shall not exceed the amount of the Settlement Fund, including accrued interest.

20. The Defendants shall, no later than 45 days after receiving the compensation list referred to in paragraph 18, notify each identified person eligible for compensation by a letter (using their best efforts to locate each person). The form of this letter shall be subject to the review and approval of the United States. At a minimum, the letter shall state that the identified person is eligible for compensation in the indicated amount provided he or she executes and returns to Defendants a copy of the agreed-upon release, which release shall be enclosed with the notice along with an addressed and postage-paid return envelope. Each letter shall identify the loan(s) the identified person has or had with AIG FSB or WFI. The letter shall explain the complaint resolution program referenced in paragraph 22 of this Order. If the parties are unable to agree on the terms of the letter, any party may bring the dispute to the Court for resolution. Any letters that are returned with a forwarding address shall promptly be re-sent to that new address. Defendants shall provide an accounting of these notifications, indicating the name and address to which each was dispatched, within the 45-day period referred to in this paragraph. Defendants shall issue checks in the amount indicated on the compensation list to all identified persons who execute and return the releases. Defendants shall issue and mail such checks no later than 21 days after the receipt of the release. Defendants shall set forth reasonable deadlines for requirements of return of releases, and for the timely deposit of checks, subject to approval of the United States, so that the compensation is distributed and checks are presented for payment or become void prior to the date that is one year from the date the initial notifications are sent. The Defendants shall provide, as part of the reporting required in paragraph 25, an accounting of releases received, checks sent, and notifications for which no response has been received or that were reported to be undeliverable. The United States may make its own efforts to locate aggrieved persons.

21. Any moneys not distributed from the Settlement Fund including accrued interest within one year of the date the initial notifications are sent to persons deemed to be aggrieved by the United States pursuant to paragraph 19 (Remaining Moneys) shall be distributed for educational purposes as provided for in paragraph 10. In the event the Remaining Moneys total less than \$1,000,000 at that time, Defendants shall replenish the Settlement Fund so that it contains \$1,000,000 for distribution for those educational purposes.

22. In addition to the above, during the period of this Order the Defendants shall maintain a robust complaint resolution program to address consumer complaints regarding wholesale home-mortgage loans originated by the Defendants. Documentation regarding such complaint resolution program, including documentation of individual complaints and resolutions, if any, shall be made available to the United States on a quarterly basis and included in the semi-annual reports referenced in paragraph 25. A person shall not be deemed ineligible for the complaint resolution program on the basis of having executed the release described in paragraph 19(a), but there is no requirement under this Order that any complaint necessarily be resolved for or against Defendants.

IV. EVALUATING AND MONITORING COMPLIANCE

23. For the duration of this Order, both AIG FSB and WFI shall retain all records relating to their obligations hereunder, including their wholesale home-mortgage lending activities, as well as their compliance activities as set forth herein. The United States shall have the right to review and copy such records upon request, including loans files and electronic data for loans made during the period of this Order.

24. Each Defendant shall provide to counsel for the United States the data on its lending that is submitted to the Federal Financial Institutions Examination Council (FFIEC) pursuant to the Home Mortgage Disclosure Act and the Community Reinvestment Act. The data

will be provided in the same format in which it is presented to the FFIEC, within thirty days of its submission to the FFIEC each year, for the duration of this Order, including the record layout.

25. In addition to the submission of any other plans or reports specified in this Order, both AIG FSB and WFI shall submit semi-annual reports to the United States on their progress in completing the requirements of paragraphs 3-22 of this Order. Each such report shall provide a complete account of each Defendant's actions to comply with each requirement of this Order during the previous year, an objective assessment of the extent to which each quantifiable obligation was met, an explanation of why any particular component fell short of meeting its goal for that year, and any recommendations for additional actions to achieve the goals of this Order. Each Defendant shall submit its first report no later than 180 days after entry of this Order, and every 180 days thereafter for so long as the Order is in effect. In addition, if applicable, each Defendant shall attach to the semi-annual reports representative copies of training materials disseminated pursuant to this Order.

26. In the event AIG FSB seeks to transfer or assign its charter or either AIG FSB or WFI seeks to transfer or assign all its operations in a transaction that requires the approval of a federal bank or thrift regulatory agency, AIG FSB or WFI must notify counsel for the United States at the same time it notifies the regulatory agency. If such notification is made and the relevant regulatory agency approves such transaction, this Order shall terminate with respect to that Defendant upon consummation of the transfer or assignment transaction, except that the requirements of paragraphs 10 and 15-21 of this Order shall continue in force against the Defendant's successor in interest until such time as those requirements are completed. In the event either AIG FSB or WFI seeks to transfer or assign all or part of its operations in a transaction that does not require the approval of a federal bank or thrift regulatory agency and the

successor or assign is engaged in or intends to carry on a wholesale mortgage-lending business, the relevant Defendant shall, as a condition of sale, obtain the written agreement of the successor or assign to be bound by any obligations remaining under this Order which are applicable to that Defendant for the remaining term of this Order. Nevertheless, in the event of a proposed, arms-length transaction of transfer or assignment of operations affecting AIG FSB or WFI, the Defendants may petition the United States to waive the requirement for a successor or assign to be bound under this Order, and the United States, after such review, may, in its discretion, waive such requirement. The Defendants shall supply such information as the United States may request to enable the United States to effectively review the waiver petition.

V. ADMINISTRATION

27. The requirements of this Order shall be in effect for three years, except as specified elsewhere in this Order, at which time they will expire and be of no further applicability. Notwithstanding the above, this Order may be extended further upon motion of the United States to the Court, for good cause shown. Upon satisfaction of paragraphs 10 and 15-21, or upon making arrangements, in which the United States concurs, that all procedures and requirements of these paragraphs will be satisfied, any Defendant may seek and obtain a separate dismissal of the case against it in the event the Order no longer applies to it or upon demonstration to the Court that it has permanently ceased its business operations.

28. Any time limits for performance fixed by this Order may be extended by mutual written agreement of the parties. Other modifications to this Order may be made only upon approval of the Court, upon motion by either party. The parties recognize that there may be changes in relevant and material factual circumstances during the term of this Order which may impact the accomplishment of its goals. The parties agree to work cooperatively to discuss and attempt to agree upon any proposed modifications to this Order resulting therefrom.

29. In the event that any disputes arise about the interpretation of or compliance with the terms of this Order, the parties shall endeavor in good faith to resolve any such dispute between themselves before bringing it to this Court for resolution. The United States agrees that if it reasonably believes that any Defendant has violated any provision of this Order, it will provide the appropriate Defendant written notice thereof and allow thirty days to resolve the alleged violation before presenting the matter to this Court. In the event of either a failure by a Defendant to perform in a timely manner any act required by this Order or an act by a Defendant in violation of any provision hereof, the United States may move this Court to impose any remedy authorized by law or equity, including attorneys' fees and costs.

30. Each Defendant's compliance with the terms of this Order, or the termination of this Order with respect to a Defendant in accordance with its provisions, shall fully and finally resolve all claims of the United States relating to the alleged violations by that Defendant of the fair lending laws, as alleged in the Complaint in this action, including all claims for equitable relief and monetary damages and penalties. Each party to this Order shall bear its own costs and attorney's fees associated with this litigation.

31. The Court shall retain jurisdiction for the duration of this Order to enforce the terms of the Order, after which time the case shall be dismissed with prejudice.

SO ORDERED, this 19 day of March, 2010.


UNITED STATES DISTRICT JUDGE

The undersigned hereby apply for and consent to the entry of this Order:

For Defendant AIG Federal Savings Bank

For Defendant Wilmington Finance, Inc.


MICHAEL B. MIERZEWSKI


THOMAS M. HEFFERON

Arnold & Porter LLP
555 Twelfth Street, NW
Washington, DC 20004-1206
Tel: (202) 942-5995
Fax: (202) 942-5999
michael.mierzewski@aporter.com

Goodwin Procter, LLP
901 New York Ave., NW
Washington, D.C. 20001
Tel: (202) 346-4029
Fax: (202) 346-4444
thefferon@goodwinprocter.com

For Plaintiff United States

STEVEN H. ROSENBAUM
Chief

DONNA M. MURPHY
Deputy Chief


HOWARD R. GRIFFIN
Attorney


ROBIN L. DULL
Attorney

U.S. Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
950 Pennsylvania Ave. NW
Northwest Building
Washington, DC 20530
howard.r.griffin@usdoj.gov
robin.dull@usdoj.gov
Tel: (202) 514-4741
Tel: (202) 305-7780

APPENDIX A

**We do Business in Accordance with
Federal Fair Lending Laws**

**UNDER THE EQUAL CREDIT OPPORTUNITY
ACT, IT IS ILLEGAL TO DISCRIMINATE IN ANY
CREDIT TRANSACTION:**

**On the basis of race, color, national origin, religion,
sex, marital status, or age;**

Because income is from public assistance; or

**Because a right has been exercised under the Federal
Consumer Credit Protection Laws.**

**IF YOU BELIEVE YOU HAVE BEEN
DISCRIMINATED AGAINST, YOU SHOULD SEND
A COMPLAINT TO:**

Office of Thrift Supervision

OR

U.S. Department of Justice

Washington, DC 20530

Tel: 1-800-896-7743

Website:

<http://www.usdoj.gov/crt/housing>

APPENDIX B

Employee Acknowledgment

I acknowledge that on _____, 2010, I was provided copies of the Consent Order entered by the Court in United States v. AIG Federal Savings Bank, et al., (D. Del.), and the loan policy developed pursuant thereto. I have read and understand these documents and have had my questions about these documents answered. I understand my legal responsibilities and shall comply with those responsibilities.

Signature

Print Name

Job Title

Date

APPENDIX C

Employee Training Certification

I certify that on _____, 2010, I received training with respect to my responsibilities under the Consent Order entered by the Court in United States v. AIG Federal Savings Bank, et al., (D. Del.), and the federal fair lending laws. I have had the opportunity to have my questions about them answered. I understand my legal responsibilities not to discriminate under the federal fair lending laws, including the Equal Credit Opportunity Act and the Fair Housing Act, and shall comply with those responsibilities.

Signature

Print Name

Job Title

Date

APPENDIX D

Release

In consideration for the parties' agreement to the terms of the Consent Order entered in United States v. AIG Federal Savings Bank and Wilmington Finance, Inc. (D. Del.), and the payment to me of \$ _____, pursuant to the Consent Order and effective upon that payment, I hereby release and forever discharge all claims, rights, remedies, and recoveries related to the facts at issue in the litigation referenced above or in any way related to that litigation, and release and forever discharge all claims, rights, remedies, and recoveries arising from housing and credit discrimination alleged in that litigation in connection with my loan(s), known and unknown, up to and including the date of execution of this release.

I understand that this releases those claims, rights, remedies and recoveries against AIG Federal Savings Bank and/or Wilmington Finance, Inc., and against any and all entities, parents, predecessors, successors, subsidiaries, and affiliates related to either of those companies, and against any and all of the past and present directors, officers, agents, managers, supervisors, shareholders, and employees and their heirs, executors, administrators, successors in interest, or assigns of either of those companies in connection with my loan(s).

Executed on _____, 2010.

Signature

Print Name

Address

Cooper, Tink (CRT)

From: Schultz, Vicki (CRT)
Sent: Friday, February 11, 2011 4:48 PM
To: Cooper, Tink (CRT); Hermilla, Nelson (CRT)
Cc: Rodriguez, Leon (CRT); Halperin, Eric (CRT)
Subject: FW: Consent Order Entered
Attachments: 4 -- Consent Order.pdf

7th

From: Rosenbaum, Steven (CRT)
Sent: Monday, March 22, 2010 12:14 PM
To: Schultz, Vicki (CRT); Halperin, Eric (CRT)
Cc: Murphy, Donna (CRT)
Subject: AIG: Consent Order Entered

FYI ...

From: Murphy, Donna (CRT)
Sent: Monday, March 22, 2010 11:59 AM
To: Rosenbaum, Steven (CRT)
Cc: Griffin, Howard R (CRT); Dull, Robin (CRT)
Subject: FW: AIG: Consent Order Entered

Steve – The AIG consent order was entered on Friday.

Donna

From: Dull, Robin (CRT)
Sent: Monday, March 22, 2010 11:54 AM
To: Murphy, Donna (CRT)
Cc: Griffin, Howard R (CRT); Bloch, Farrell (CRT); Dyer, Jane W (CRT); Popowich, Janice (CRT)
Subject: AIG: Consent Order Entered

Donna:

Judge Farnan signed an order granting our unopposed motion in AIG on Friday, and entered the consent order today (attached). I'll email the defendants to let them know.

Robin

Robin L. Dull
Trial Attorney
United States Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
(o) (202) 305-7780
(f) (202) 514-1116

Overnight/Courier address (preferred):

1800 G Street, N.W., Suite 7060
Washington, D.C. 20006

Mailing address (significant delays due to security screening):
950 Pennsylvania Ave., N.W. – NWB
Washington, D.C. 20530

10-4123

United States Senate

WASHINGTON, DC 20510

July 8, 2010

Via Electronic Transmission

The Honorable Eric H. Holder, Jr.
Attorney General
United States Department of Justice
950 Pennsylvania, Ave, NW
Washington, DC 20530

Dear Attorney General Holder:

As a senior member of the Senate Committee on the Judiciary (Committee), it is my duty to conduct oversight of the United States Department of Justice (Department). I write today regarding the Department's recent change in policy regarding the use of Settlement Funds and consent orders within the Civil Rights Division (Division).

When the Division enters into a settlement agreement to end a civil action where damages are available, it will often require the defendant to establish a settlement fund, from which aggrieved individuals will be compensated. Once all identified victims are compensated, there is often a portion of the settlement fund unspent. In past years, it was the policy of the Department to return this amount to the defendant. Yet my office has learned that the Division has recently changed this policy. Specifically, in certain cases the Division appears to be using consent orders and settlement funds to fund outside organizations unconnected to the litigation.

In a recent civil case alleging violations of the Fair Housing Act and Equal Credit Opportunity Act, the Department entered into a consent order with the defendants requiring them to deposit \$6.1 million into an interest-bearing escrow account. From this account, the defendants are required to provide a minimum of \$1 million to "qualified organizations" selected by the defendant and approved by the Department to provide "credit counseling, financial literacy, and other related educational programs." In the event that less than \$1 million remains in the fund after the payment of damages to individuals identified by the Department, the defendant is required to replenish the fund for the purposes of financing the "qualified organizations."

In another case regarding the Equal Credit Opportunity Act, the Department entered into a consent order with the defendant requiring that they dedicate "at least 400 staff hours" and "at least ONE (One) Hundred Thousand Dollars" each year of the agreement to a specified consumer financial education and financial literacy program.

While these settlements may appear reasonable on their face, I am concerned that this change in policy has the potential to divert compensation intended for victims to third party interest groups that were not wronged by the defendant. Absent proper safeguards and internal controls, this policy change could drastically alter the way victims are

compensated and could set the Department down a path where third party interest groups are compensated to a greater level than victims. Moreover, as a staunch supporter of victims' rights, I want to know what this change in policy means for individual victims and for advocacy groups that are both selected and not selected to serve as "qualified organizations."

In order to better understand the rationale behind the policy shift and to determine how this policy will impact victims of civil rights violations, I ask that you provide answers to the following questions:

- 1) When did the Department change the policy and start requiring defendants in civil rights actions to compensate third party organizations?
- 2) Has the Deputy Attorney General or the Assistant Attorney General for the Civil Rights Division issued any internal guidance regarding the selection and appointment of a "qualified organization"? If so, provide a copy. If not, why not and will the Department issue such guidance in the future?
- 3) Provide a detailed explanation for this change in policy and provide copies of all internal memoranda/material related to the change.
- 4) How many settlements have utilized this new policy and required a defendant to pay a third party "qualified organization" since the implementation of this new policy?
- 5) Provide an explanation for how the Division calculates settlement funds, including, but not limited to any internal guidance or memoranda.
- 6) What, if any, qualifications are taken into consideration when determining whether an organization should be designated a "qualifying organization"? What protections and safeguards are in place to oversee the use of funds by the "qualified organization" to ensure that monies that could otherwise be used for victim compensation are used in a manner free of fraud, waste, and abuse?
- 7) What, if any, transparency and accountability does the Department place on "qualified organizations", including reporting and audit requirements?
- 8) Has the Department considered the creation of a fund to compensate victims of Civil Rights Violations in a manner similar to the Crime Victims Fund? If so, has the Department formulated a legislative proposal to that effect?
- 9) Prior to the selection of an organization as a "qualified organization," does the Division consult with the Office of Victims of Crime at the Department? If not, has consideration been given to such a consultation with the Office of Victims of Crime? If not, why not?
- 10) For the Division's settlements during calendar years 2008, 2009, and as of the date of this letter for 2010, provide:

- a) The total amount paid into settlement funds;
- b) Of this amount, the total paid to individuals as victims of the defendant's activity;
- c) The total amount returned to defendants;
- d) The total amount given to outside organizations either from the settlement fund or as otherwise required by the settlement;
- e) Please provide an accounting for each instance in which an outside organization, which was not a party to the litigation, has been funded or otherwise supported through a settlement by the Division. For each instance, provide the identity of the outside organization that was funded or otherwise supported; and
- f) In each of these years, has the Association of Community Organizations for Reform Now (ACORN), or any entity affiliated—financially or otherwise—with ACORN, received funds or support through a Division settlement? (A copy of ACORN-affiliated organizations is attached)

Thank you for your cooperation and attention to this important matter. Please respond to the questions set forth in this letter no later than July 29, 2010. If you have any questions, please do not hesitate to contact Christopher Armstrong or Jason Foster at (202) 224-4515. All formal correspondence should be sent electronically in PDF format to Brian_Downey@finance-rep.senate.gov or via facsimile to (202) 228-2131.

Sincerely,



Charles E. Grassley
United States Senator

Attachment



MEMORANDUM

November 4, 2009

Subject: Federal Funding to the Association of Community Organizations for Reform Now (ACORN) and Related Organizations

From: Meredith Peterson
Information Research Specialist
7-8990

In response to multiple requests for information on federal funding for the Association of Community Organizations for Reform Now (ACORN) and its affiliated organizations, CRS has prepared the following memorandum.

To identify organizations affiliated with ACORN, CRS contacted ACORN to request a list of affiliates. ACORN provided CRS with a list of "associated" organizations, which they defined as organizations that share a common mission with ACORN. ACORN also provided a list of related organizations, which they defined as organizations that use or used a common mailing address with ACORN, organizations for which one or more of the directors served at some point on the ACORN Board of Directors, and organizations that have ACORN in their name. CRS researched federal funding awards to all of the organizations named by ACORN, as well as federal funding to "allied" organizations formerly listed on the ACORN Website. These organizations are listed in the **Appendix**.

To identify federal funding that may have been received by ACORN or its affiliates, CRS has compiled information from publicly available sources. These sources do not include information about subgrants and may not include all federal grants awarded directly to ACORN or its affiliates. Due to these limitations, this memorandum may not provide a complete account of federal funding received by ACORN or its affiliates.

For federal funding information, CRS searched several sources, including the *Federal Register*, USAspending.gov, and federal agency websites. **Table 1** presents the results of this search. The table lists awards *announced* by federal agencies. Except where noted, CRS did not verify with the agency or the grantee that the funding was actually provided. A brief discussion of the sources CRS consulted follows.

USAspending.gov

The Federal Funding Accountability and Transparency Act of 2006 (P.L. 109-282) requires the creation of a single searchable website for the public to find information on federal funding awards, including the name of the entity receiving the award, the amount of the award, and the funding agency. The website

USAspending.gov was created to provide this information to the public. Data on grants, loans, insurance, and direct subsidies comes from the Federal Assistance Award Data System (FAADS). FAADS is a repository of data on federal financial assistance award transactions made by 33 federal agencies covering about 600 assistance programs.

However, USAspending.gov does not yet provide a complete and accurate account of federal assistance awards. According to the Office of Management and Budget, "data submitted for posting to USAspending.gov in the past has contained duplicates, missing transactions and data elements, and other data quality problems."¹ In addition to data quality problems, "funds reported in FAADS may differ from those reported in various accounting or finance systems. Some differences are due to agency reporting practices, while others result from differences in effective reporting dates or interpretations of definitions and requirements."²

For this research, CRS used USAspending.gov to identify federal agencies and programs that may have awarded funding to ACORN or ACORN affiliates. However, the award information presented in Table 1 is based on federal agency award announcements rather than award transactions from USAspending.gov.

Federal Register

Section 102(a)(4)(C) of the Department of Housing and Urban Development Reform Act of 1989 (P.L. 101-235) requires the Department of Housing and Urban Development (HUD) to announce grant awards in the *Federal Register*.³ CRS searched the *Federal Register* for grants awarded by HUD to ACORN, its state chapters, related organizations as named by ACORN, and allied organizations formerly listed on the ACORN Website (see the Appendix).

Federal Agency Websites

CRS also conducted general searches of federal agency websites. CRS performed additional searches on the websites of federal agencies cited in media reports as providing funding to ACORN, including the Department of Justice (DOJ), the Environmental Protection Agency (EPA), and the Federal Emergency Management Agency (FEMA), Department of Homeland Security (DHS), and HUD.

Congressional Quarterly (CQ)

To identify congressionally directed funding to ACORN or organizations affiliated with ACORN that may have been included in the conference reports for appropriations bills, CRS searched CQ's database of committee reports (108th – 111th Congresses). CQ's database allows searching in committee report tables, which often include information on congressionally directed funding.

¹ Guidance on Data Submission under the Federal Funding Accountability and Transparency Act (FFATA) (OMB, June 2009). http://www.whitehouse.gov/omb/assets/memoranda_fy2009/m09-19.pdf

² *Federal Assistance Award Data System Users' Guide for Federal FY2008*. (U. S. Census Bureau, March 2009) <http://ftp2.census.gov/govs/faads/guide2008.pdf>

³ This requirement applies to grants made directly by HUD. Recipients of HUD funding may choose to subgrant funds to other entities and those subgrants are not reflected in the *Federal Register*.

Table 1. Selected Federal Funding to ACORN and its Related Organizations
FY1990-FY2008

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Associates	Albuquerque, NM	HUD	Fair Housing Initiatives Program (Education and Outreach General Component)	\$99,974	FY2008	14.408	HUD Website
New York Agency for Community Affairs	Nassau County, NY	HUD	Fair Housing Initiatives Program (Education and Outreach General Component)	\$99,427	FY2008	14.408	HUD Website
ACORN Institute	New Orleans, LA	FEMA	Fire Prevention and Safety Grants	\$997,402*	FY2008	97.044	FEMA Website
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Comprehensive)	\$1,623,570	FY2008	14.169	HUD press release
ACORN Housing Corporation	National	Neighborworks	National Foreclosure Mitigation Counseling Program (Legal Assistance)	\$1,200,000	FY2008	n/a	Neighborworks Website
ACORN Housing Corporation	National	Neighborworks	National Foreclosure Mitigation Counseling Program (Counseling)	\$16,000,000	FY2008	n/a	Neighborworks Website
ACORN Housing Corporation	National	Neighborworks	National Foreclosure Mitigation Counseling Program (Counseling)	\$7,850,939	FY2008	n/a	Neighborworks Website
ACORN Housing Corporation	Saint Paul, MN	HUD	Fair Housing Initiatives Program (Education and Outreach General Component)	\$100,000	FY2007	14.408	72 FR 65345
New Mexico ACORN Fair Housing	Albuquerque, NM	HUD	Fair Housing Initiatives Program (Education and Outreach General Component)	\$99,757	FY2007	14.408	72 FR 65345
American Institute for Social Justice	Denver, CO	HUD	Fair Housing Initiatives Program (Education and Outreach General Component)	\$99,887	FY2007	14.408	HUD Website
Arkansas Community Housing Corporation	Little Rock, AR	HUD	Fair Housing Initiatives Program (Education and Outreach General Component)	\$99,948	FY2007	14.408	HUD Website
ACORN Institute	New Orleans, LA	DHS	Fire Prevention and Safety Grants	\$450,484	FY2007	97.044	FEMA Website
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Comprehensive)	\$1,628,829	FY2007	14.169	73 FR 16036

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Institute	Washington, DC	HUD	Resident Opportunities for Self Sufficiency (Family and Homeownership Program)	\$124,324	FY2007	14.870*	73 FR 66665
ACORN Tenant Union Tenant Organizing Project	Las Vegas, NV	HUD	Resident Opportunities for Self Sufficiency (Family and Homeownership Program)	\$124,965	FY2007	14.870	73 FR 66665
ACORN Institute	Columbus, OH	HUD	Resident Opportunities for Self Sufficiency (Family and Homeownership Program)	\$189,171	FY2007	14.870	73 FR 66665
ACORN Fair Housing, A Project for the American Institute for Social Justice*	Washington, DC	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$99,080	FY2006	14.408	72 FR 2001
New Mexico ACORN Fair Housing	Albuquerque, NM	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$99,724	FY2006	14.408	72 FR 2001
American Environmental Justice Project	Baltimore, MD	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$99,716	FY2006	14.408	HUD Website
ACORN Associates	Albuquerque, NM	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/Subprime Lending Component)	\$49,997	FY2006	14.408	72 FR 2001
Louisiana ACORN Fair Housing Organization, A Project of ACORN Community Land Association	New Orleans, LA	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/ Fair Housing Awareness Component)	\$100,000	FY2006	14.408	72 FR 2001
Project Vote	New Castle County, DE	U.S. Election Assistance Commission (EAC)	Help America Vote College Poll Worker Program	\$16,876	FY2006	90.400	EAC Website
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Comprehensive Counseling)	\$1,821,596	FY2006	14.169	73 FR 12189
ACORN Institute	Dallas, TX	HUD	Resident Opportunities and Self-Sufficiency (Family and Homeownership Program)	\$179,916	FY2006	14.870	72 FR 74320

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Institute	Dallas, TX	HUD	Resident Opportunities and Self-Sufficiency (Family and Homeownership Program)	\$124,915	FY2006	14.870	72 FR 74320
ACORN Institute	Dallas, TX	HUD	Resident Opportunities and Self-Sufficiency (Family and Homeownership Program)	\$124,693	FY2006	14.870	72 FR 74320
ACORN Housing	St. Paul, MN	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative)	\$100,000	FY2005	14.408	70 FR 73785
ACORN Institute	Dallas, TX	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative)	\$96,953	FY2005	14.408	70 FR 73785
Arkansas Community Housing Corporation	Lititz Rock, AR	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative)	\$100,000	FY2005	14.408	HUD Website
Missouri Tax Justice Research Project	St. Louis, MO	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative)	\$100,000	FY2005	14.408	70 FR 73785
American Institute for Social Justice	Washington, DC	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/Homeownership Component)	\$100,000	FY2005	14.408	70 FR 73785
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Comprehensive Counseling)	\$1,197,255	FY2005	14.169	71 FR 14236
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Colonias)	\$78,354	FY2005	14.169	71 FR 14236
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Predatory Lending)	\$323,439	FY2005	14.169	71 FR 14236
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Homeownership Voucher)	\$275,000	FY2005	14.169	71 FR 14236
NY ACORN programs	Brooklyn, NY	DOJ	Juvenile Justice Programs (congressionally directed funding)	\$140,000	FY2005	16.541	H.Rept 108-792
ACORN Associates	New Orleans, LA	HUD	Operation Lead Elimination Action Program	\$1,999,920	FY2005	14.903	71 FR 34384
ACORN Institute	Washington, DC	HUD	Resident Opportunities and Self Sufficiency (Resident Service Delivery Models—Family)	\$362,378	FY2005	14.870	73 FR 4891

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Housing Corporation	Illinois	HUD	Self-Help Homeownership Opportunity Program	\$527,000	FY2005	14.247	71 FR 51207
ACORN Fair Housing, A Project Of American Institute	Washington, DC	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$80,000	FY2004	14.408	71 FR 53107
ACORN Housing Corporation	St. Paul, MN	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$80,000	FY2004	14.408	71 FR 53107
ACORN Institute	New Orleans, LA	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$80,000	FY2004	14.408	71 FR 53107
ACORN Housing Corporation of Texas	Houston, TX	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$49,865	FY2004	14.408	71 FR 53107
Arkansas Community Housing Corporation	Little Rock, AR	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/Homeownership Component)	\$50,000	FY2004	14.408	HUD Website
American Environmental Justice Project	Baltimore, MD	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$80,000	FY2004	14.408	HUD Website
ACORN Community Land Association	Albuquerque, NM	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/Hispanic Fair Housing Awareness Component)	\$99,775	FY2004	14.408	71 FR 53107
ACORN Housing Corporation of Arizona	Phoenix, AZ	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/Hispanic Fair Housing Awareness Component)	\$99,840	FY2004	14.408	71 FR 53107
ACORN Community Land Association of Louisiana	Baltimore, MD	HUD	Fair Housing Initiatives Program (Fair Housing Organizations Initiative/Establishing New Organizations Component)	\$200,000	FY2004	14.408	71 FR 53107
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Comprehensive)	\$1,812,471	FY2004	14.169	70 FR 22668
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Predatory Lending)	\$325,000	FY2004	14.169	70 FR 22668

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Section 8)	\$275,000	FY2004	14.169	70 FR 22668
ACORN Associates	New Orleans, LA	HUD	Operation Lead Elimination Action Program	\$2,000,000	FY2004	14.903	70 FR 20927
Louisiana Environmental Justice Project (LEJP)*	New Orleans, LA	EPA	Collaborative Problem-Solving Cooperative Agreements	\$100,000	FY2003	66.306	EPA Website
ACORN Fair Housing	Washington, DC	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$ 79,988	FY2003	14.408	71 FR 53112
ACORN Institute, Inc	New Orleans, LA	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$ 79,896	FY2003	14.408	71 FR 53112
ACORN Housing Corporation	St. Paul, MN	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$ 80,000	FY2003	14.408	71 FR 53112
ACORN Community Land Association of LA	New Orleans, LA	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$ 80,000	FY2003	14.408	71 FR 53112
Arkansas Community Housing Corp.	Little Rock, AR	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/Fair Housing and Minority Homeownership Component)	\$100,000	FY2003	14.408	71 FR 53112
ACORN Housing Corporation of AZ	Phoenix, AZ	HUD	Fair Housing Initiatives Program (Hispanic Fair Housing Awareness Component)	\$95,000	FY2003	14.408	71 FR 53112
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Comprehensive)	\$2,024,511	FY2003	14.169	69 FR 8219
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Predatory Lending)	\$380,282	FY2003	14.169	69 FR 8219
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (Section 8)	\$250,962	FY2003	14.169	69 FR 8219
ACORN Associates	New Orleans, LA	HUD	Operation Lead Elimination Action Program	\$ 999,974	FY2003	14.903	68 FR 66121
ACORN Tenant Union--Training & Organizing Project	Washington, DC	HUD	Resident Opportunity & Self Sufficiency (Resident Service Delivery Models--Family)	\$278,636	FY2003	14.870	71 FR 59515

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Tenant Union-Training & Organizing Project	Washington, DC	HUD	Resident Opportunity & Self Sufficiency (Resident Service Delivery Models--Family)	\$230,500	FY2003	14.870	71 FR 59515
ACORN Fair Housing	Washington, DC	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$100,000	FY2002	14.408	71 FR 52563
ACORN Housing Corporation	St. Paul, MN	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$100,000	FY2002	14.408	71 FR 52563
ACORN Community Land Association of LA	New Orleans, LA	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$100,000	FY2002	14.408	71 FR 52563
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program	\$1,167,044	FY2002	14.169	68 FR 1621
ACORN Housing Corporation	Illinois	HUD	Self-Help Homeownership Opportunity Program	\$351,000	FY2002	14.247	71 FR 51205
ACORN Housing Corporation	St. Paul, MN	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$100,000	FY2001	14.408	71 FR 52559
Arkansas Community Housing Corporation	Little Rock, AR	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$100,000	FY2001	14.408	HUD Website
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program	\$1,032,192	FY2001	14.169	67 FR 2228
ACORN Fair Housing, a Project of the American Institute for Social Justice	Washington, DC	HUD	Fair Housing Initiatives Program (Education and Outreach Initiative/General Component)	\$300,000	FY2000	14.408	66 FR 56695
ACORN Housing Corporation	Chicago, IL	HUD	Housing Counseling Program (noncompetitive award)	\$300,000	FY2000	14.169	66 FR 18783
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program (competitive award)	\$597,474	FY2000	14.169	66 FR 18784
Arkansas Institute for Social Justice ^b	Baltimore, MD	EPA	Environmental Justice Small Grants Program	\$15,000	FY1999	66.604	EPA Website

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program	\$1,000,000	FY1998	14.169	64 FR 33493
ACORN Housing Corporation	Chicago, IL	HUD	Self-Help Homeownership Opportunity Program	\$751,500	FY1998	14.247	64 FR 7206
ACORN Tenant Union Training and Organizing Project	Washington, DC	HUD	Tenant Opportunities Program	\$ 99,900	FY1998	14.853	64 FR 18040
Arkansas ACORN Fair Housing	Little Rock, AR	HUD	Fair Housing Initiatives Program (Education And Outreach Initiative--Community Tensions Component)	\$100,000	FY1997	14.408	63 FR 8465
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program	\$1,000,000	FY1997	14.169	63 FR 45832
ACORN Tenant Union Training Project	Brooklyn, NY	HUD	Tenant Opportunities Program	\$ 250,000	FY1997	14.853	63 FR 17204
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program	\$900,000	FY1996	14.169	61 FR 55811
ACORN Housing Corporation	New Orleans, LA	Corporation for National and Community Service (CNCS)	AmeriCorps	\$1,419,893	FY1995	94.006	CNCS Website
ACORN Housing Corporation	Philadelphia, PA	HUD	Housing Counseling Program	\$ 850,500	FY1995	14.169	60 FR 55037
ACORN Tenant Union	Brooklyn, NY	HUD	Tenant Opportunity Program Technical Assistance Grant	\$100,000	FY1995	14.853	61 FR 5015
ACORN	St. Louis, MO	EPA	Environmental Justice Small Grants Program	\$6,665	FY1994	66.604	EPA Website
ACORN Housing Corporation	Dallas, TX	HUD	Fair Housing Initiatives Program	\$ 120,000	FY1994	14.408	59 FR 63369
ACORN Housing Corporation	Phoenix, AZ	HUD	Fair Housing Initiatives Program	\$ 100,000	FY1994	14.408	59 FR 63369

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
Louisiana Fair Housing Organization, d/o Louisiana ACORN	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$ 250,000	FY1994	14.408	59 FR 63369
ACORN Tenant Union	Washington, DC	HUD	Tenant Opportunities Program Technical Assistance Grant	\$100,000	FY1994	14.853	61 FR 26193
South-Central ACORN Tenant Union	Dallas, TX	HUD	Tenant Opportunities Program Technical Assistance Grant	\$100,000	FY1994	14.853	61 FR 26193
ACORN New England Fair Housing Project	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$95,000	FY1993	14.408	59 FR 35942
ACORN Peachtree Coalition for Fairness in Housing	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$95,000	FY1993	14.408	59 FR 35942
ACORN Midwest Fair Housing Consortium	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$95,000	FY1993	14.408	59 FR 35942
ACORN Southern Fairness in Housing Coalition	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$ 95,000	FY1993	14.408	59 FR 35942
ACORN Missouri Consortium for Fair Housing	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$ 95,000	FY1993	14.408	59 FR 35942
ACORN Fair Housing for Washington Coalition	New Orleans, LA	HUD	Fair Housing Initiatives Program	\$ 95,000	FY1993	14.408	59 FR 35942
ACORN Housing Corp of Illinois	Chicago, IL	HUD	HOPE for Homeownership of Single Family Homes Program	\$893,750	FY1993	n/a	59 FR 13498
ACORN Housing Corporation	Little Rock, AR	HUD	HOPE for Homeownership of Single Family Homes Program	\$447,890	FY1992	n/a	57 FR 48038
ACORN Housing Corporation	Phoenix, AZ	HUD	HOPE for Homeownership of Single Family Homes Program	\$1,683,213	FY1992	n/a	57 FR 48038

Recipient Name	Recipient Location	Agency	Program	Amount	Funding Year	CFDA Number	Source
ACORN Housing Corporation of Illinois	Chicago, IL	HUD	Neighborhood Development Demonstration Program	\$50,000	FY1992	n/a	58 FR 43648
ACORN Housing Corporation	Phoenix, AZ	HUD	Neighborhood Development Demonstration Program	\$50,000	FY1992	n/a	58 FR 43648
ACORN Housing Corporation	Phoenix, AZ	HUD	Neighborhood Development Demonstration Program	\$50,000	FY1991	n/a	56 FR 46005
ACORN Housing Corporation	Phoenix, AZ	HUD	Neighborhood Development Demonstration Program	\$50,000	FY1990	n/a	55 FR 43040

Sources: Federal Register, HUD Website, EPA Website, FEMA Website, CNCS Website, Neighborworks America, H. Rept. 108-792, Catalog of Federal Domestic Assistance (CFDA).

Notes: Awards are listed in reverse chronological order and then alphabetically by program title.

- a. This award was announced just prior to the passage of the first Continuing Resolution Appropriations Resolution (CR, P.L. 111-68) which included a provision prohibiting federal funding under the CR or "any prior Act" to ACORN or "any of its affiliates, subsidiaries, or allied organizations." This provision was extended to December 18, 2009, by the second CR (P.L. 111-88). According to FEMA, no grant was awarded and the grant will not be restored when the CR expires.
- b. A list of the locations of expected subgrantees for the February 2008 awards is available at http://www.nw.org/network/nfmcq/documents/ProjectedRevised_LocationofNFMCAwardesandSubGrantees.pdf; locations of expected subgrantees for the December 2008 awards is at <http://www.nw.org/network/nfmcq/documents/RD2DetailedStateProfileSummaryReport1201608.pdf>.
- c. The National Foreclosure Mitigation Counseling Program was created by the Consolidated Appropriations Act of 2008 (P.L. 110-161) in December 2007. The legislation appropriated \$180 million for the program and named NeighborWorks America to act as the administrator. An additional \$180 million was appropriated for the program through the Housing and Economic Recovery Act of 2008 (P.L. 110-289), including \$30 million for legal assistance. The Omnibus Appropriations Act of 2009 (P.L. 111-8) appropriated \$50 million for NFMCA.
- d. In FY2008, Resident Opportunities and Self Sufficiency (ROSS)-Family & Homeownership and ROSS-Elderly/Persons with Disabilities were combined into one ROSS-Service Coordinators program.
- e. Listed as American Institute for Social Justice in the Federal Register.
- f. USA Spending gov lists this award to N.Y Agency For Community Affairs, an organization included in the affiliates list provided by ACORN. Location information is from USA Spending gov.
- g. ACORN's list of affiliates names the Environmental Justice Training Project. EPA's grant announcement contact information is Stephen Bradberry, 1024 Elysian Fields Ave. New Orleans, LA, laacornmohe@acorn.org
- h. ACORN's list of affiliates names the American Institute of Justice incorporated in Arkansas. The grant announcement indicates that "the Institute for Social Justice sponsor's [sic] the Washington/Baltimore ACORN Environmental Empowerment Project, which works to increase lead poisoning awareness amongst the communities. The goal is to expand the outreach efforts by doing presentations for parents on lead poisoning, doing regional training for grassroots leaders, and building partnerships between advocacy organizations, neighborhood institutions, and ACORN members."

- i. Corporation for National Service Inspector General Audit of ACORN Housing Corporation, <http://www.cnscig.gov/PDF/AuditReports/fy96/96-21.pdf>. This award was terminated prior to the end of the award period.
- j. Award announcement notes that this award was combined with a similar project in another region.
- k. This organization name is not listed by ACORN. The address in the award announcement is the address given on the ACORN Website for ACORN National Research: 4415 San Jacinto St, Dallas, TX.
- l. These organization names are not listed by ACORN. The address in the award announcement is the address given on the ACORN Website for ACORN National: 1024 Elysian Fields, New Orleans, LA.

Appendix.

ACORN State Chapters

Arkansas ACORN

Arizona ACORN

California ACORN

Colorado ACORN

Connecticut ACORN

DC ACORN

Delaware ACORN

Florida ACORN

Louisiana ACORN

Massachusetts ACORN

Maryland ACORN

Michigan ACORN

Minnesota ACORN

Missouri ACORN

North Carolina ACORN

New Jersey ACORN

New Mexico ACORN

Nevada ACORN

New York ACORN

Ohio ACORN

Oregon ACORN

Pennsylvania ACORN

Rhode Island ACORN

Texas ACORN

Washington ACORN

ACORN Associated Organizations

ACORN describes these organizations as independent entities that share a common mission with ACORN. According to ACORN, these organizations may be linked in several ways. Organizations with employees may provide retirement and health benefits through the same multi-employer plans. Associated organizations may purchase certain services (e.g., telephone or Internet services) through a

common billing arrangement. And many of these organizations have contracted with ACORN for projects or services and with Citizens' Consulting, Inc. for services such as bookkeeping.

ACORN Institute

American Institute for Social Justice

ACORN Community Land Association of Louisiana

Arkansas Community Housing Corp.

California Community Network

NY Agency for Community Affairs

Pennsylvania Institute for Community Affairs

Agape Broadcast Foundation (KNON Dallas)

Arkansas Broadcasting Foundation

ACORN Law for Education, Representation and Training (changed name to ACORN Legal Education Advocacy and Defense Fund)

Affiliated Media Foundation Movement

American Environmental Justice Project

Citizens Services, Inc.

ACORN Tenant Union Training and Organizing Project

ACORN Center for Housing

American Home Daycare Workers Association

Arkansas ACORN Fair Housing (merged into Arkansas Community Housing Corp.)

Louisiana ACORN Fair Housing (merged into ACORN Community Land Association of Louisiana)

New Mexico ACORN Fair Housing

5301 McDougall Corp.

4415 San Jacinto Corp.

Baltimore Organizing and Support Center

Broad Street Corporation

Elysian Fields Corp.

Fifteenth Street Corp.

New Mexico Organizing and Support Center

New York Organizing and Support Center

St. Louis Organizing and Support Center

ACORN Votes: Federal PAC

Community and Labor United for Baltimore

ACORN Votes Issues Committee: California

Arizona ACORN Issues Committee
Arkansas ACORN PAC
California ACORN PAC
Colorado ACORN Issues Committee
District of Columbia ACORN PAC
Louisiana ACORN PAC
Maryland ACORN PAC
Massachusetts ACORN PAC
Minnesota ACORN PAC
Missouri ACORN PAC
New Mexico ACORN PAC
New York ACORN PAC
Pennsylvania ACORN PAC
Texas ACORN PAC
American Home Day Care Workers Association PAC: Louisiana
Council Health Insurance Plan (multi-employer health insurance plan)

Inactive, Closing¹

Southern Training Center
Citizens Consulting, Inc.
Association for the Rights of Citizens
National Center for Jobs and Justice
Council Beneficial Association (multi-employer retirement plan)
Council Health Plan (multi-employer health insurance plan)
People's Equipment Resource Center
ACORN Associates, Inc.
ACORN Television in Action for Communities
ACORN Tenants Union
ACORN Community Labor Organizing Center
ACORN Services, Inc.

¹ These are organizations described by ACORN as in the process of being "wound down," dissolved, or closed.

ACORN Beneficial Association
ACORN Campaign Services
ACORN Children's Beneficial Association
ACORN Cultural Trust
ACORN Fair Housing
ACORN Fund
ACORN National Broadcasting Network
Citizens for Future Progress
Democracy for America
Environmental Justice Training Project
Hammurabi Foundation
Iowa ACORN Broadcasting Corp.
Metro Technical Institute
Middle South Home Day Care Workers Association
Montana Radio Network
New Orleans Community Housing Organization
People Organizing Workfare Workers
Shreveport Community Television
United Security Workers of America
Volunteers for America
Volunteers for California
Volunteers for Missouri, Inc.
Chicago Organizing and Support Center

Dissolved, Closed⁵

Missouri Tax Justice Research Project
ACORN Campaign to Raise the Minimum Wage
ACORN Foster Parents
Alabama Radio Movement
Baton Rouge Association of Educational Personnel

⁵ These are organizations described by ACORN as being dissolved, closed, or defunct.

Community Training for Environmental Justice
Flagstaff Broadcast Foundation
Illinois Home Day Care Worker Association
Maricopa Community Television Project
Missouri Home Child Care Workers Association
Movement for Economic Justice
Orleans Criminal Sheriffs Workers Organization
Radio New Mexico
Colorado Organizing and Support Center
Citizens Campaign for Fair Work
Illinois ACORN PAC
Rhode Island PAC
Floridians for All ACORN PAC
Committee to Raise Wages
ACORN Law Reform Political Action Committee
Progressive St Louis Reform Committee for an Accountable Future
Reform Committee for an Accountable Future
Citizens for Future Progress
Campaign for Justice at Avondale
New Orleans Campaign for a Living Wage
St. Louis Tax Reform Group⁶

Related Organizations Identified by ACORN

ACORN provided this list of organizations which use or used a common mailing address with ACORN, organizations for which directors were also on the ACORN Board of Directors at some point in time, and organizations that have the word ACORN in their name. ACORN does not have information on their current status.

ACORN International
ACORN Institute Canada
ACORN Canada

⁶ ACORN notes status as "'final' tax reform filed for 2008."

American Workers Association
Baton Rouge Association of School Employees
Chief Organizer Fund
Citizens Services Society
Community Labor Organizing Committee
Greenwell Springs Corp.
Hospitality Hotel and Restaurant Organizing Counsel
Houston Organizing and Support Center
Jefferson Area Public Employees
Jefferson Area School Employees
Labor Link, Inc
Labor Neighbor Research and Training Center
Local 100 Health and Welfare Fund
Local 100 PAC
Local 100 Retirement Fund
Service Workers Action Team
Sixth Avenue Corporation
Texas United City-County Employees
Texas United School Employees
United Labor Foundation of Greater New Orleans
WalMart Alliance for Reform Now
WalMart Workers Association
Working Families Association
650 PAC
ACORN Housing, Inc.
ACORN Beverly, LLC
ACORN Community Land Association of Illinois
ACORN Community Land Association of Pennsylvania
ACORN Community Land Association, Inc.
ACORN Housing Affordable Loans
ACORN Housing Corporation of Illinois
ACORN Housing Corporation of Missouri
ACORN Housing Corporation of Pennsylvania
ACORN Housing Corporation, NOLA

Arizona ACORN Housing Corp.
Arkansas ACORN Housing Corp.
Desert Rose Homeowners Association
Desert Rose Homes
Massachusetts ACORN Housing Corp.
McLellan Multi-Family Corp.
New Jersey ACORN Housing, Inc.
Texas ACORN Housing Corp, Inc.
Phoenix Organizing and Support Center
NY ACORN Housing Company, Inc.
1825 Atlantic Ave ACORN Housing, Inc.
385 Palmetto Street Housing Development Fund Corp.
730 Rockaway ACORN Housing, Inc.
ACORN 2004 Housing Development Fund Corp.
ACORN 2005 Housing Development Fund Corp.
ACORN 2007 Housing Development Fund Corp.
ACORN Housing 1 Associates, LP
ACORN Housing 2 Associates, LP
ACORN Housing 2, Inc.
ACORN Housing 3, Inc.
ACORN Housing 3 Associates, LP
ACORN Housing 4 Associates, LP
ACORN Housing 4, Inc.
ACORN NJ Straight Apartments, LP
ACORN Straight Apartments, LP
ACORN Dumont Sneiderer Housing Development Fund
Franklin ACORN Housing, Inc.
Mott Haven ACORN Housing Development Fund
Mutual Housing Association of New York
Mutual Housing Association of New York 2003
Mutual Housing Association of New York Development Fund Corp
ACORN Bristol Housing, Inc.
ACORN Bristol Housing Development Corp
ACORN Homes 2006

ACORN Housing 2007 Housing Development Fund Corp

Phoenix Estates Housing Development Fund Corp

Phoenix Estates, Inc.

Phoenix Estates, LLC

ACORN Allied Organizations Formerly Listed on the ACORN Website⁷

ACORN Institute

WalMart Alliance for Reform Now

ACORN Housing Corporation

ACORN Living Wage Resource Center

KABF Radio

KNON Radio

Project Vote

Service Employees International Union - Local 100

Service Employees International Union - Local 880

⁷ ACORN Website on August 22, 2008, accessed on the Internet Archive:
<http://web.archive.org/web/20080822090025/www.acorn.org/index.php?id=12375>
