



Mortgage Loan Fraud Update

Suspicious Activity Report Filings
In 4th Quarter and Calendar Year 2011



April 2012



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Introduction

This update to FinCEN's prior Mortgage Loan Fraud (MLF) assessments examines Suspicious Activity Report (SAR) filings from January through December 2011 (CY 2011), with a particular emphasis on the 4th Quarter (2011 Q4). It provides new information on reporting activities, geographic locations, and other filing trends in Q4 and CY 2011. This update includes tables and illustrations of various geographies that compare Q4 and CY 2011 filings based on dates that suspicious activities are reported to have begun. Tables covering non-geographic aspects are compared with filings from corresponding periods in 2010.

A section on Current Issues analyzes SARs filed during CY 2011 that describe suspicious activity starting two or fewer years before the SAR filing.

Overall Filings

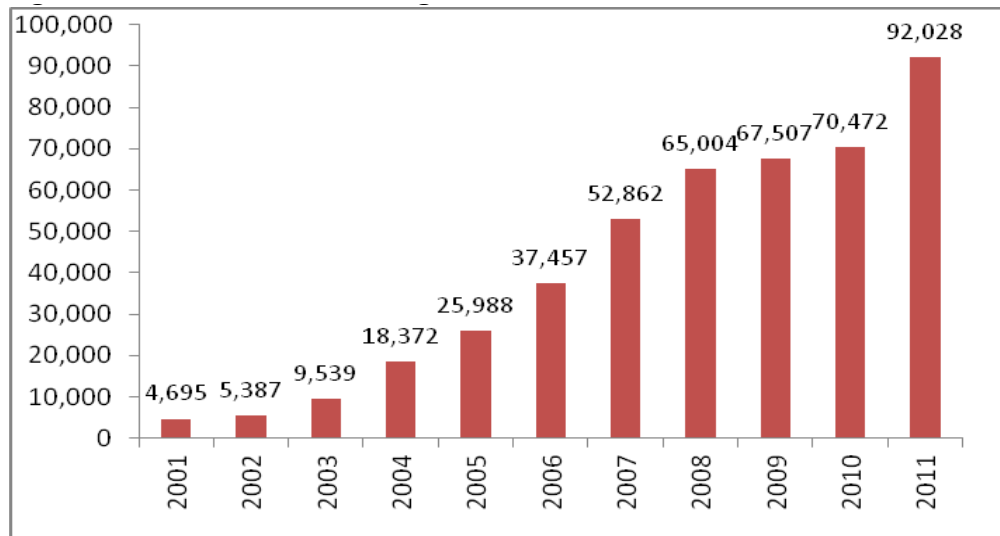
In CY 2011, filers submitted 92,028 Mortgage Loan Fraud SARs (MLF SARs)¹, a 31 percent² increase over the previous year. In 2011 Q4, filers submitted 17,050 MLF SARs, a 9 percent decrease in filings over the same period in 2010.³ The fourth quarter 2011 number, while too soon to call a trend, was the first time since 2010 Q4 where filings of MLF SARs had fallen from the previous year. In comparison, the total number of SARs filed in 2011 Q4 increased by 15 percent. Eight percent of all SARs filed in 2011 Q4 indicated MLF as an activity characterization, down from 11 percent in Q4 of the previous year.⁴

Table 1: Mortgage Loan Fraud SAR Filings Relative to All SAR Filings				
	2011 Q4	2010 Q4	CY 2011	CY 2010
MLF SARs	17,050 (-9%)	18,759	92,028 (+31%)	70,472
All SARs	204,043 (+15%)	176,912	794,710 (+14%)	697,389
MLF SARs as a proportion of all SARs	8%	11%	12%	10%

1. For purposes of this report, SARs and totals thereof refer only to the Suspicious Activity Report filed by depository institutions (TD F 90-22.47) contained in the FinCEN system of record in mid-February, 2012. Total SAR counts were minimally lower after this date due to various transitioning activities completed in the FinCEN systems modernization programs. Related activities reported on the Suspicious Activity Report by Money Services Business (FinCEN 109) and Suspicious Activity Report by Securities and Futures Industries (FinCEN 101) are not included in table or map totals. Percentages throughout this report are rounded to the nearest whole number.
2. This upward spike in 2011 MLF SAR counts is directly attributable to mortgage repurchase demands and special filings generated by several institutions.
3. Filing increases are not necessarily indicative of an overall increase in mortgage loan fraud (MLF) activities over the noted period, as the volume of SAR filings in any given period does not directly correlate to the number or timing of suspected fraudulent incidents in that period. For further explanation, see FinCEN's July 2011 report, "Mortgage Loan Fraud Update: Suspicious Activity Report Filings from October 1 – December 31, 2009" at <http://www.fincen.gov/pdf/MLF%20Update.pdf>.
4. MLF SARs have constituted approximately 10 percent of all SARs filed since 2007 Q4.

Since 2001, the number of MLF SARs filed has shown a consistent upward trend (Figure 1). While the rate of growth slowed from 2008-2010, it accelerated in 2011 primarily due to reports on mortgage repurchase demands on banks. Those repurchase demands prompted review of mortgage loan origination and refinancing documents, where filers discovered fraud, which was then reported on SARs.

Figure 1: Annual MLF SAR Filings, 2001-2011



Time lapses between filing and activity dates in 2011 MLF SAR filings showed a continued focus on older activities. In CY 2011, 84 percent of reported activities occurred more than 2 years prior to filing, compared to 77 percent in CY 2010. In 2011 Q4, 80 percent of reported activities occurred more than 2 years prior to filing, compared to 82 percent in 2010 Q4 (Table 2).

For both Q4 and CY 2011, a majority of reported mortgage fraud suspicious activities began 4 or more years prior to SAR filing. This means that for both Q4 and CY 2011 filings, a majority of reported activities actually began during or before 2007.⁵ In Table 2, these filing periods are highlighted in **bold** type.

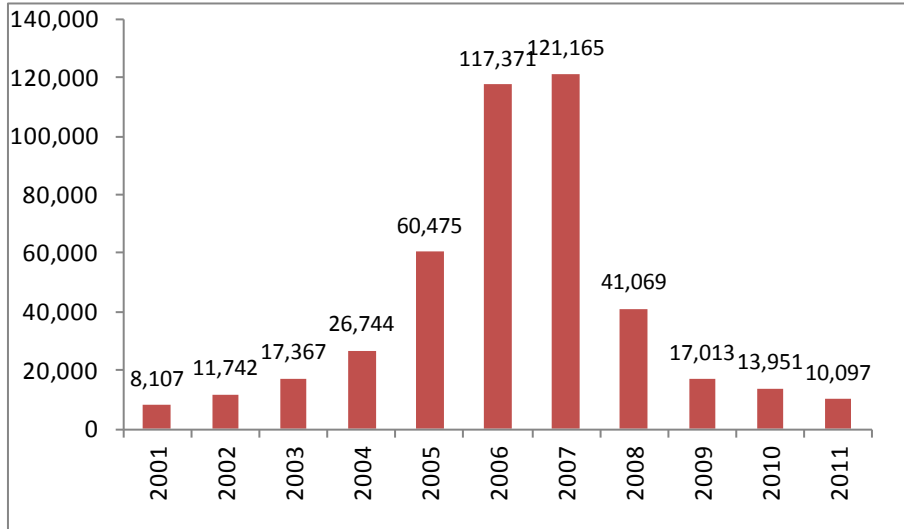
Table 2: Mortgage Loan Fraud (MLF) SARs					
Time Elapsed from Activity Date to Reporting Date⁶					
Time Lapsed	2011 Q4	2010 Q4		CY 2011	CY 2010
0 - 90 days	10%	8%		8%	11%
90 - 180 days	4%	4%		3%	4%
180 days - 1 year	3%	3%		3%	3%
1 - 2 years	3%	3%		2%	4%
2 - 3 years	2%	13%		4%	21%
3 - 4 years	13%	33%		23%	34%
4 - 5 years	32%	25%		32%	15%
> 5 years	33%	11%		26%	7%

5. FinCEN has previously reported on contributing factors that triggered loan reviews and led to the discovery of more dated suspicious activities. See “Mortgage Loan Fraud Update: Suspicious Activity Report Filings from October 1 – December 31, 2009” at <http://www.fincen.gov/pdf/MLF%20Update.pdf>.

6. Calculations for Table 2 and data for Figure 2 derive from Part III, Field 33 and Part IV, Field 50 of the depository institution SAR form. Table 2 and Figure 2 totals are based on commencement dates. SARs with omitted or erroneous filing and activity dates are not represented. While Field 33 allows filers to specify both a *commencement date* and an *end date* of suspicious activities, filers did not report an end date in 9 percent of 2011 Q4 MLF SARs. In previous periods, much fewer SARs included this information; hence, totals relying on activity end dates are less comprehensive than those based on start dates. Further, for MLF SARs reporting multiyear activities, filers frequently relate activities involving older loans that the institution continues to hold. In numerous other reports, filers related older suspected frauds that the filer detected when the same borrower applied for a more recent loan with conflicting information on the loan application, hence their inclusion of more recent activity end dates. For these reasons, calculations herein use the activity start date rather than the activity end date.

Figure 2 depicts just starting dates for suspicious activity reported in MLF SARs. It shows more clearly that the bulk of MLF SARs, regardless of filing date, reference suspicious activity that filers believe began in calendar years 2006 and 2007.

Figure 2: # MLF SAR Filings by Activity Starting Date, 2001-2011



In Q4 and CY 2011, more than 80 percent of MLF SARs involved *suspicious activity amounts* under \$500,000. Roughly a third or less of MLF SARs disclosed *loss amounts* (34 percent in 2011 Q4 and 19 percent in 2010 Q4); most of these amounts were also under \$500,000. Consistent with previous years, a relatively small number of MLF SARs (155 filings) included recovered amounts in CY 2011.⁷

Table 3: Mortgage Loan Fraud SARs								
Reported Amounts ⁸ of: (1) Suspicious Activity and (2) Loss Prior to Recovery								
		< \$100K	\$100K - \$250K	\$250K - \$500K	\$500K - \$1M	\$1M - \$2M	> \$2M	Not indicated
(1) SARs reporting suspicious activity amounts	2011 Q4	2,178 13%	6,425 38%	5,997 35%	1,497 9%	433 3%	435 3%	111 1%
	2010 Q4	3,096 17%	6,961 37%	6,059 32%	1,628 9%	514 3%	435 2%	66 -%
	CY 2011	12,550 14%	32,886 36%	32,070 35%	14,113 15%	28 -%	50 -%	331 -%
(2) SARs reporting loss amounts	2011 Q4	3,726 22%	1,256 7%	582 3%	112 1%	48 -%	17 -%	11,309 66%
	2010 Q4	1,731 9%	1,192 6%	454 2%	138 1%	54 -%	16 -%	15,174 81%
	CY 2011	7,439 8%	4,473 5%	2,623 3%	1,035 1%	0 -%	0 -%	76,458 83%

7. Due to the low number of MLF SARs citing recovered amounts, this data is not included in Table 3. Percentages under 1% are omitted or indicated with a hyphen in this report.

8. The amount of suspicious activity, loss prior to recovery, and recovery are reported in Part III of the SAR form, Fields 34, 36, and 37.

Subject Locations

The following tables rank states, metropolitan areas, and counties based on the number of subjects in Q4 and CY 2011 MLF SARs with suspicious activity dates starting after January 1, 2009. The lists also show rankings based on numbers of subjects per capita, to highlight areas where MLF activity is greater relative to the population size.

Expanded tables for additional state, metropolitan statistical area (MSA), and county locations are provided at http://www.fincen.gov/mlf_sar_data/ in Excel format with historical quarterly data from January 2006 forward. Ranking methodologies and other metadata are provided within these files.

By State

State File

In both Q4 and CY 2011, California and Florida ranked as the highest states based on total numbers of subjects, as they have been every quarter since 2006. Illinois and New York traded off 3rd and 4th place rankings during 2011, with Illinois ranking 3rd for the year and New York 4th.

California also had the highest number of MLF subjects per capita, for both the quarter and year. In Q4, Florida and Hawaii followed California; these two states also appeared in the top four rankings during Q3 2011. For the 2011 calendar year, California was followed in the per capita rankings by Hawaii, Florida, and Nevada. In contrast, for the 2010 calendar year, rankings were very different, with Nevada 1st, Florida 2nd, California 3rd, and Illinois 4th.

Table 4: Mortgage Loan Fraud SAR Subjects Top 10 States and Territories					
State	CY 2011 Rank by volume	CY 2011 Rank per capita	State	2011 Q4 Rank by volume	2011 Q4 State Rank per capita
CA	1	1	CA	1	1
HI	27	2	FL	2	2
FL	2	3	HI	28	3
NV	18	4	IL	3	4
DC	40	5	NV	19	5
IL	4	6	DC	37	6
AZ	9	7	GA	6	7
NJ	7	8	UT	23	8
UT	24	9	AZ	9	9
DE	35	10	MD	10	10

By Metropolitan Statistical Area

MSA File

During 2011 Q4, Los Angeles ranked highest among the 50 most populous metropolitan areas, based on total MLF subjects, followed by New York, Chicago, and Miami. Per capita, California cities dominated 2011 Q4, with San Diego, San Jose and Los Angeles leading the rankings, followed by Tampa and Orlando.

For CY 2011, rankings varied slightly from Q4. Los Angeles ranked highest in annual MLF subjects, followed by New York, Chicago, and Miami; consistent with Q4. In terms of subjects per capita in CY 2011, two California cities ranked highest: San Jose and Los Angeles. Miami ranked third and was followed by three other California municipalities; Riverside, San Diego, and San Francisco.

The Q4 rankings included some significant changes in per capita SAR filings from the previous quarter. San Diego, for example, jumped from 12th ranking in subjects per capita during Q3 to 1st in Q4 while Riverside fell from 2nd to 11th. Atlanta jumped from 22nd in Q3 to 8th in Q4 while Milwaukee fell from 10th to 20th.

Table 5: Mortgage Loan Fraud SAR Subjects
Top 10 Metropolitan Statistical Areas (MSAs)

<i>MSA</i>	<i>CY 2011 Rank by volume</i>	<i>CY 2011 Rank per capita</i>	<i>MSA</i>	<i>2011 Q4 Rank by volume</i>	<i>2011 Q4 Rank per capita</i>
San Jose-Sunnyvale-Santa Clara, CA	11	1	San Diego-Carlsbad-San Marcos, CA	6	1
Los Angeles-Long Beach-Santa Ana, CA	1	2	San Jose-Sunnyvale-Santa Clara, CA	14	2
Miami-Fort Lauderdale-Pompano Beach, FL	4	3	Los Angeles-Long Beach-Santa Ana, CA	1	3
Riverside-San Bernardino-Ontario, CA	5	4	Tampa-St. Petersburg-Clearwater, FL	9	4
San Diego-Carlsbad-San Marcos, CA	9	5	Orlando-Kissimmee, FL	15	5
San Francisco-Oakland-Fremont, CA	6	6	Miami-Fort Lauderdale-Pompano Beach, FL	4	6
Las Vegas-Paradise, NV	20	7	Chicago-Naperville-Joliet, IL-IN-WI	3	7
Tampa-St. Petersburg-Clearwater, FL	13	8	Atlanta-Sandy Springs-Marietta, GA	5	8
Orlando-Kissimmee, FL	19	9	San Francisco-Oakland-Fremont, CA	7	9
Chicago-Naperville-Joliet, IL-IN-WI	3	10	Las Vegas-Paradise, NV	18	10

By County

County File

Of the 100 most populous U.S. counties, Los Angeles and Cook remained the top two reported jurisdictions in volume for mortgage fraud subjects, as they have been since Q4 2010.

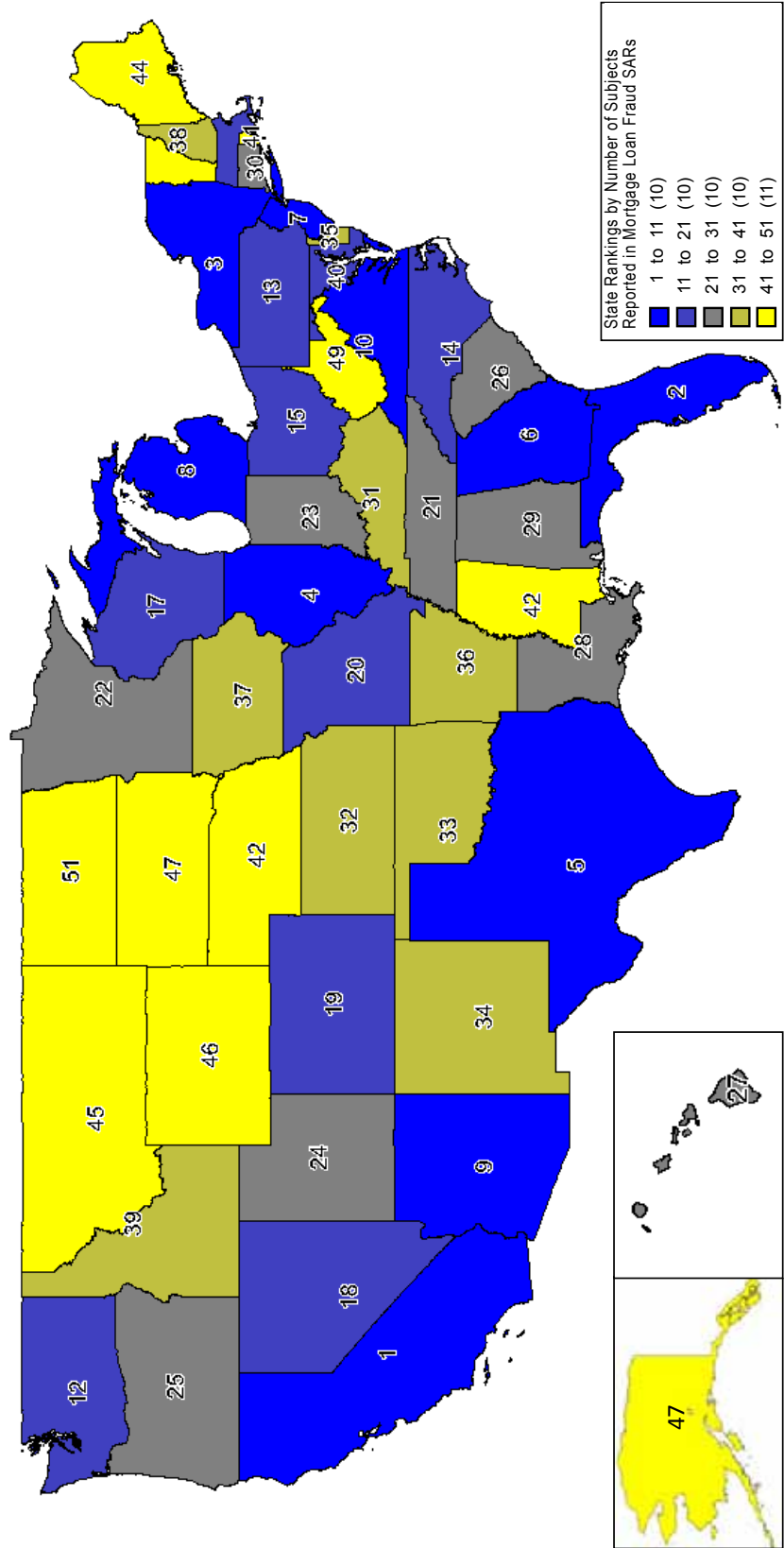
Per capita, California and Florida counties generally had the most mortgage fraud subjects in both Q4 and CY 2011. However, county rankings were inconsistent between Q4 and the full year. For example, Hillsborough ranked 1st for Q4 and 8th for CY 2011. Santa Clara was 4th in Q4 and 1st for the full CY 2011. Orange, CA was 9th for Q4 and 2nd for CY 2011.

**Table 6: Mortgage Loan Fraud SAR Subjects
Top 10 Counties**

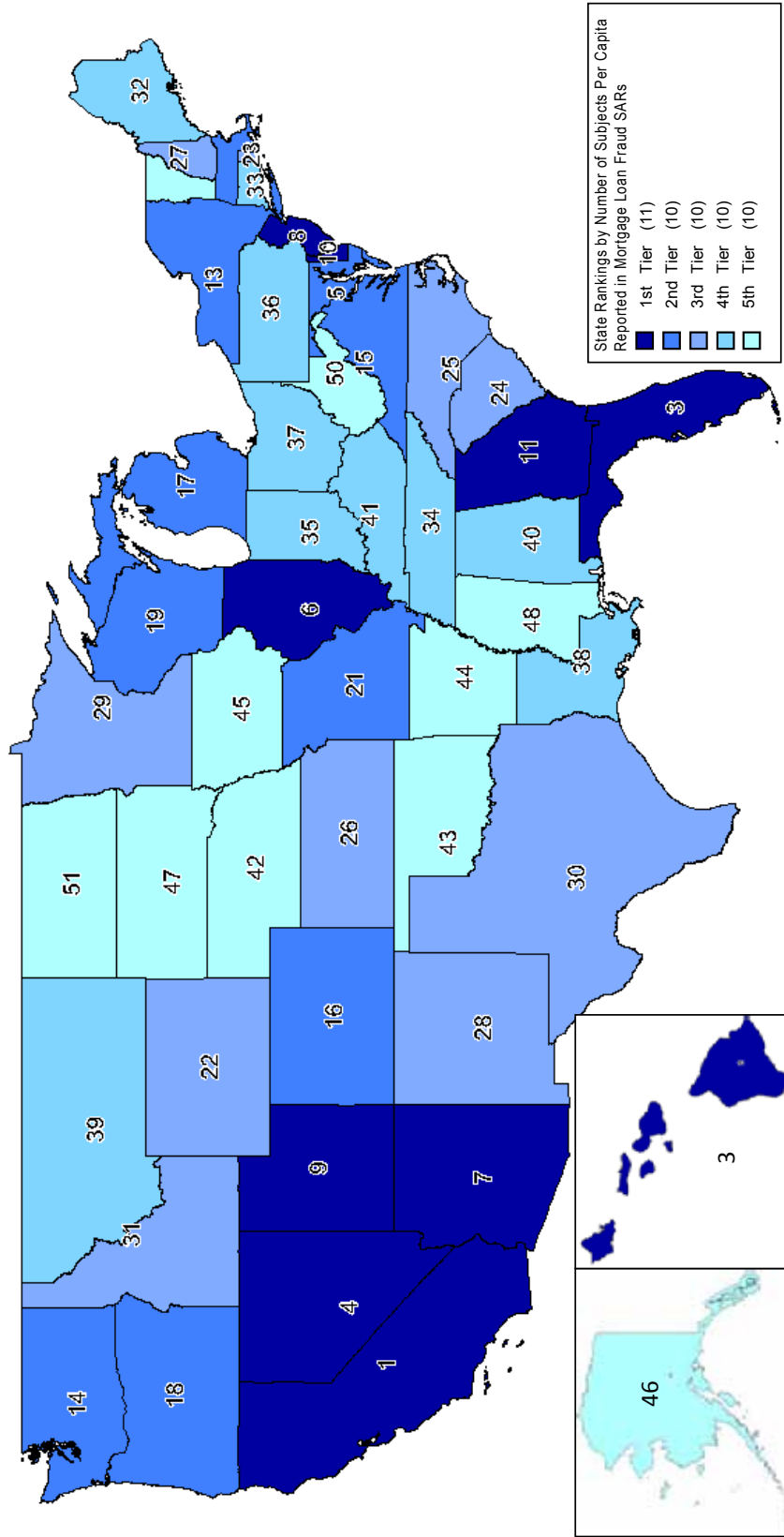
County	State	CY 2011 Rank by volume	CY 2011 Rank per capita	County	State	2011 Q4 Rank by volume	2011 Q4 Rank per capita
Santa Clara	California	6	1	Hillsborough	Florida	8	1
Orange	California	3	2	Gwinnett	Georgia	18	2
Riverside	California	8	3	San Diego	California	3	3
Broward	Florida	9	4	Santa Clara	California	7	4
Los Angeles	California	1	5	Los Angeles	California	1	5
Alameda	California	13	6	Orange	Florida	20	6
Fairfax	Virginia	20	7	Miami-Dade	Florida	6	7
Hillsborough	Florida	18	8	Alameda	California	13	8
San Mateo	California	31	9	Orange	California	4	9
Gwinnett	Georgia	27	10	Broward	Florida	11	10

The following maps show mortgage fraud geographic concentrations reported in CY 2011 for activities occurring during the previous two calendar years (i.e. CY 2009 – CY 2011). Maps show subjects by state and metropolitan area, with concentrations based on numeric and per capita subject totals.

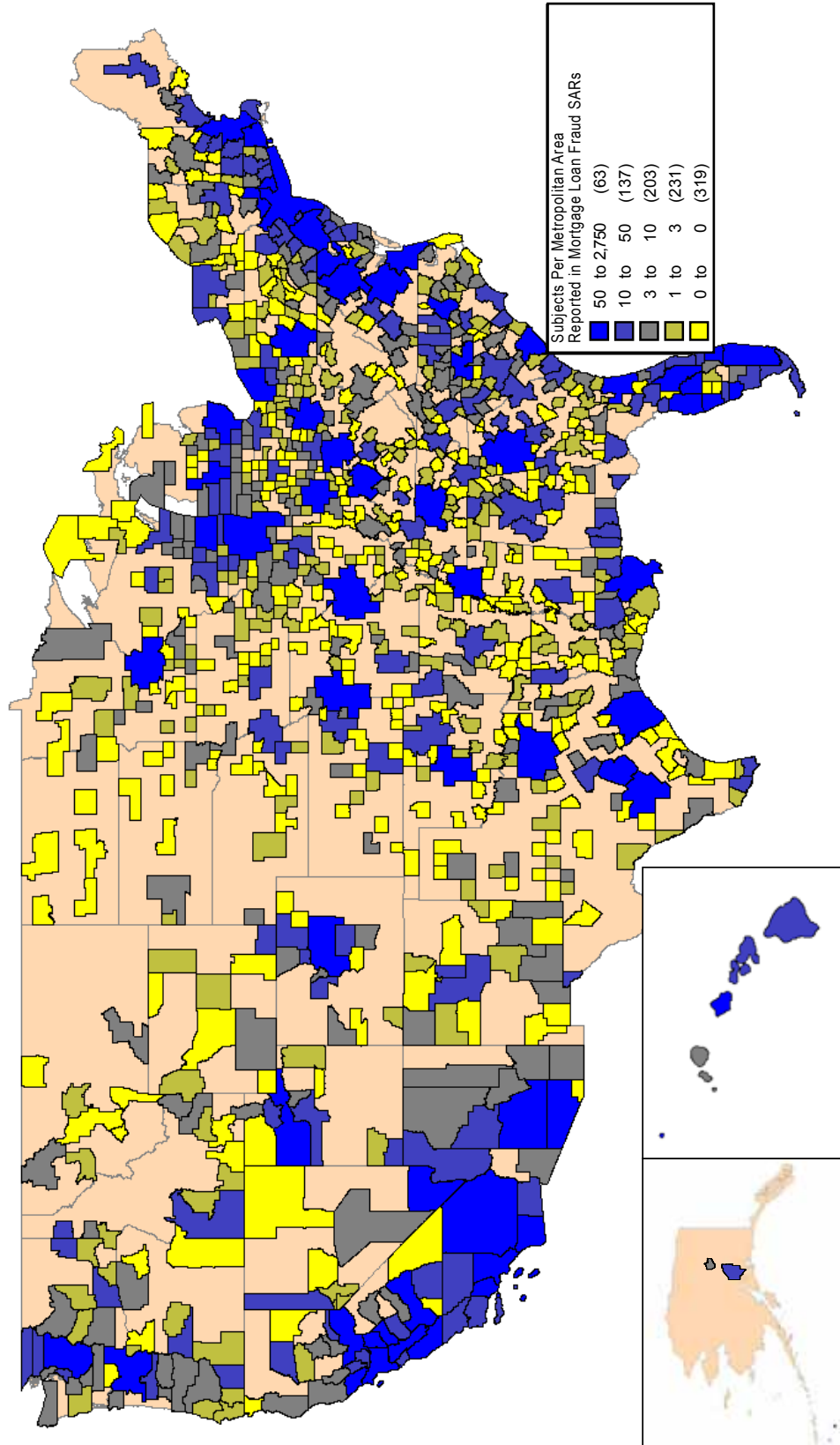
*Mortgage Loan Fraud SAR Subjects
State Location Ranks, January – December, 2011*



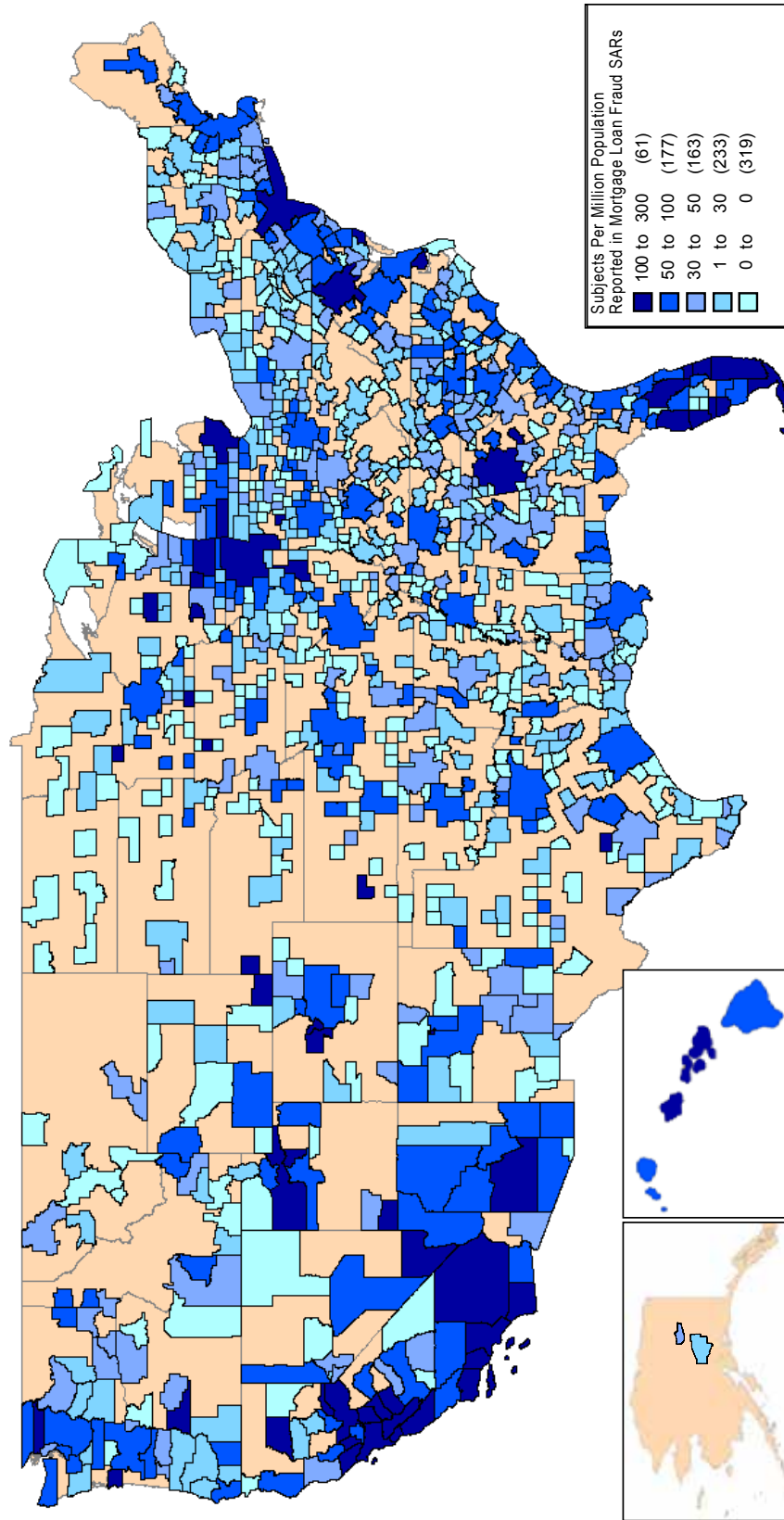
**Mortgage Loan Fraud SAR Subjects Per Capita
State Location Ranks, January – December, 2011**



Mortgage Loan Fraud SAR Subjects
Top Metropolitan Areas, January – December, 2011



*Mortgage Loan Fraud SAR Subjects Per Capita
Top Metropolitan Areas, January – December, 2011*



Current Issues

To better understand the latest trends in reporting of suspected mortgage fraud, FinCEN examined a subset of 2011 calendar year filings that reported suspicious activity beginning two years or less before the SAR was filed. Filers submitted 14,230 MLF SARs during CY 2011 addressing such activities, or 15 percent of the 92,028 MLF SARs submitted to FinCEN during the calendar year. This was a broader universe of SARs than FinCEN analyzed in its 2011 Q1 and Q2 reports, and narrower than in its Q3 report.⁹

For this report, FinCEN analyzed the narratives of a statistically representative, randomly selected sample of 375 of these 14,230 SARs. FinCEN sought to determine the types of fraud that filers described in these narratives. Figure 3 below depicts the relative frequency with which the narratives addressed broad categories of fraud. Most of these categories, and approximately 80 percent of the sample SARs, clearly described “fraud for housing,” or fraudulent attempts by individual borrowers to qualify for new loans or refinance under preferential terms. Another 17 percent¹⁰ of the sample SARs clearly described “fraud for profit” attempts by real estate professionals, investors, or scammers to generate unusual profits from real estate transactions or by providing “service” to distressed homeowners.

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9. In this report, and the 2011 Q1 and Q2 reports, inclusion in the subset was based on subtracting the activity starting dates reported by filers (in Part III, Field 33 of the SAR form) from the dates the SARs entered the BSA database. In this CY 2011 report, the analysis included differences of two years or less. In the 2011 Q1 and Q2 reports, the analysis included differences of 90 days or less. In 2011 Q3, inclusion in the analysis was based on examination of the starting and ending dates reported by filers (in Part III, Field 33 of the SAR form) and based on term searches in the narrative (Part V of the SAR form.)
 10. In the final 3 percent of sample SARs, FinCEN could not determine whether the subjects’ motivation was “fraud for housing” or “fraud for profit.”

Figure 3 - Categories of Fraud Addressed in MLF SAR Narratives

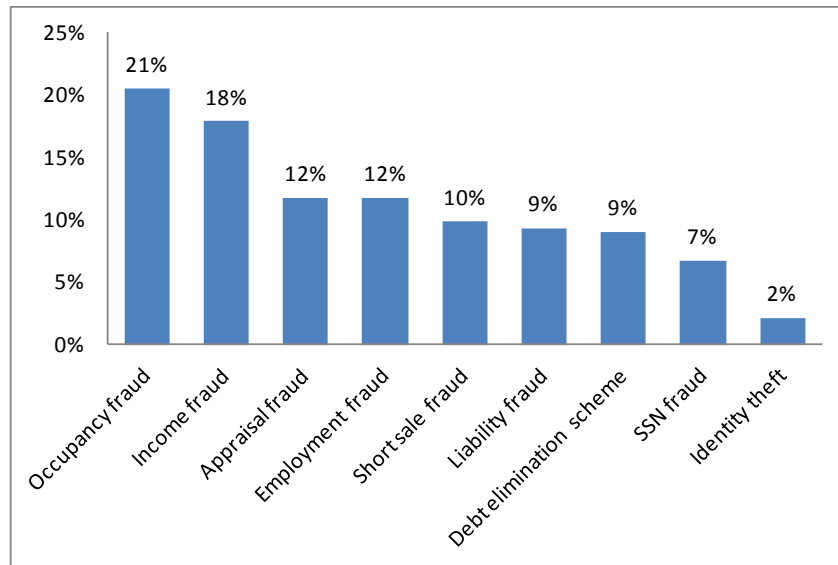


Figure 4 - Mortgage Loan Fraud Definitions

Occupancy fraud occurs when borrowers, to obtain favorable loan terms, claim that subject properties will be their primary residences instead of vacation homes or investment properties. It also occurs when subjects apply for loans for properties that others, such as family members, will actually occupy.

Income fraud includes both overstating income to qualify for larger mortgages and understating income to qualify for hardship concessions and modifications.

Appraisal fraud includes both overstating home value to obtain more money from a sale or cash-out refinancing, and understating home value to purchase a property at lower cost.

Employment fraud includes misrepresenting whether, where, and for how long borrowers have been employed; whether borrowers are unemployed or collecting unemployment benefits; and whether borrowers are independent contractors or business owners.

Liability fraud occurs when borrowers fail to list significant financial liabilities, such as other mortgages, car loans, or student loans, on mortgage loan applications. Without complete liability information, lenders cannot accurately assess borrowers' ability to repay debts.

Debt elimination schemes involve the use or purported use of bogus documents and payment methods to invalidate mortgage obligations or pay off mortgage balances. Individuals orchestrating debt elimination schemes typically charge borrowers fees for debt elimination services.

Social Security Number (SSN) Fraud includes the use in a loan application of an SSN that belongs to someone other than the applicant.

Identity Theft includes broader use of another's identity or identifiers (beyond an SSN) to obtain a mortgage or perpetrate a "fraud for profit" scheme.

Fraud Detection and Filer Actions

In addition, FinCEN wanted to better understand what actions (besides filing SARs) institutions had taken after discovering fraud. Forty percent of the sample narratives clearly indicate that the filing institution turned down the subject's loan application, short sale request, or debt elimination attempt because of the fraud it reported in SARs.¹¹ This, and other information gleaned from sample narratives, could indicate that changes in mortgage lending due diligence have occurred since the height of the housing bubble.

Filers cited income fraud in 18 percent of the sample SARs and debt elimination schemes in nine percent of the sample SARs. In the majority of income fraud-related SARs, filers detected the misrepresentation before funding the loan request, based on record checks during the underwriting process, and declined the application. In all of the debt elimination SARs, filers recognized invalid documents submitted to cancel mortgage obligations or pay off loan balances, and communicated to customers that their mortgages were still due. Some "fraud for profit" schemes were evident in the debt elimination SARs. For example, one filer noted the same notary public and "authorized representative" preparing, signing, and sending packages of nearly identical debt elimination documents for multiple borrowers with outstanding mortgage balances totaling tens of millions of dollars. Another filer noted a debt elimination or foreclosure rescue scam in which the subject worked with, and presumably received fees from, at least 33 individual borrowers. To pay down these borrowers' mortgages, the subject submitted bogus certified "cashier's checks" or "non-cash item checks" drawn against his account, rather than against the account of a financial institution.

Filers sometimes had difficulty detecting occupancy fraud, addressed in 21 percent of the sample SARs, before loans closed and borrowers could take possession of properties. In a number of occupancy fraud SARs, filers found misrepresentation in post-closing quality reviews, when they discovered that subjects never moved into new properties, or that others had moved into subjects' new "primary residences." But filers missed a few more obvious cases of potential occupancy fraud, for example approving a loan for a young couple to purchase a "primary residence" in a development for seniors aged 55 plus. The filer discovered this about a month after closing due to a mortgage fraud hotline tip. Filers also approved several loans for "primary residences" in resort communities or multi-family developments, despite

11. In the remaining 60% of SARs, filers either reported fraud that had been discovered after loan origination, were not clear about loan acceptance, or approved the loan despite awareness of fraud.

doubts during the underwriting process about whether subjects would live there full-time. Filers declined most refinancing requests for “primary residences” when public and personal documents indicated that subjects actually resided somewhere other than the address on the loan application.

Filers also experienced occasional problems detecting employment and liability fraud prior to loan closing, especially when subjects either lost employment or incurred additional liabilities while lenders reviewed their mortgage applications. Twelve percent of sample SARs described employment fraud, often in conjunction with income fraud, and nine percent described liability fraud, often in conjunction with occupancy fraud. In narratives, filers indicated that bank staff discovered some of this fraud during post-closing quality control exams or loan file audits. Importantly, it also appears filers improved their methods for detecting employment and liability fraud in 2011. For example, one SAR narrative that described activity starting in 2010 indicated that a subject lost his job after submitting his loan application and a number of days before his loan closed. The filer did not re-confirm employment, the subject did not disclose the job loss, and the loan was delinquent in 2011. Another SAR by the same filer described activity starting in 2011, and indicated that the filer had declined the loan after calling to re-confirm employment the day before the loan was scheduled to close, and discovering the subject’s employment had been terminated.

New Fraud Patterns - Short Sales and Appraisals

Filers addressed short sales in ten percent of the sample SARs, often in conjunction with appraisal fraud. In the majority of these SARs, filers detected potential “fraud for profit” and stopped the short sale transaction before closing. Several narratives noted red flags in short sale contracts, such as language indicating that the property could be resold promptly. Narratives also often noted low appraisal values, non-arms length relationships between short sale buyers and sellers, or previous fraudulent short sale attempts.

One SAR described an attempted short sale on a luxury property where the filer noted “common flip verbiage” in the sales contract and discovered that the “buyer’s agent” was not a licensed realtor. In addition, the filer knew the buyer due to misrepresentations on several past short sale attempts. In supporting a short sale purchase price 90 percent below the property’s value at the market peak, the buyer insisted that the home itself was worthless, but the land still had value. The filer rejected the bid based on its own appraisal results, and rejected a subsequent higher bid from the same subject.

Another SAR described a “fraud for profit” scheme including three short sales, collusion between two realtors, and a “home preservation” firm “representing” both sellers and buyers. The filer declined these short sales and described the “home preservation” firm as potentially involved in a foreclosure rescue scam.

One short sale “fraud for profit” scheme involved collusion between the same buyer and seller on several properties. The buyer also owned the real estate agency handling the sales. When the filer first rejected the short sale transactions due to these conflicts, the subjects changed the contracts to indicate that several limited liability companies (LLCs) were the buyers. The filer also rejected these changes, noting that the LLCs lacked current state registrations.

New Fraud Patterns - Identity Theft

Filers addressed identity theft in two percent of the sample SARs, with some complex “fraud for profit” schemes described in the narratives. For example, a large financial institution detailed a sophisticated identity theft scheme utilizing forged signatures and documents to transfer title to residential real estate. The real estate secured two mortgage loans that were pooled with other mortgage loans and securitized through the issuance of residential mortgage backed-securities (RMBS).¹² The filer served as trustee for two trusts that held the two residential mortgage loans described in the SAR. Another financial institution notified the filer that title to the properties had been transferred to an individual serving as trustee for a third, smaller trust. The filer conducted further research and discovered that the title changes were backed up by notarized documents filed in two local courts thousands of miles apart claiming that executives from the filing company had appeared in court to prove they were “authorized” to transfer ownership of the properties to the third trust. The “executives” then signed grant deeds transferring ownership. The filer uncovered public records reflecting the ownership changes, and public records indicating that the trust had received three additional transfers of real estate from other large financial institutions.

12. Residential mortgage backed securities (RMBS) are interests in a trust that holds investment in hundreds or thousands of individual mortgage loans. A financial institution typically serves as trustee of the trust, and the mortgage loans are typically transferred to the trust by a second financial institution. In many instances, the second financial institution continues to service the mortgage loans under a pooling and servicing agreement. Payments on RMBS are funded by borrowers’ monthly mortgage principal and interest payments to the servicer.

Additional Items of Interest in SARs

Foreclosed property “stripping” — Several SARs described borrowers who “stripped” or removed valuable items from their foreclosed homes before vacating the premises. In one SAR, borrowers removed \$33,000 worth of fixtures from the home, including major appliances and fixtures. Prior to foreclosure, these borrowers were approximately two years delinquent on their primary home loan and approximately one year delinquent on subsequent loans that had funded external improvements to their residence. In another SAR, the former owner removed exterior buildings from his acreage and sold them.

Hiding assets — One SAR described subjects structuring cash withdrawals from bank accounts for months. When confronted by a bank employee, the subjects confessed their motive: to hide assets to qualify for a mortgage modification.

Deceptive solicitations — Filers noted several deceptive foreclosure rescue and loan pre-approval solicitations, purportedly from various regional and national banks. One SAR also referenced a recent Office of the Comptroller of the Currency (OCC) warning about such deceptive correspondence.¹³

FinCEN will continue to monitor SARs and report on new trends in mortgage fraud and associated types of suspicious activity.

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FinCEN encourages readers to respond with reactions and comments to this report. Please provide FinCEN with any feedback regarding the contents of this report by contacting Webmaster@fincen.gov. Please mention “MLF Q4 report” or “MLF CY 2011 report” in your email.

13. <http://www.occ.gov/news-issuances/alerts/2011/alert-2011-2.html>



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