

Amended Housing Discrimination Complaint

Case Number: 05-21-2271-8
HUD Filing date: March 29, 2021.

1. Complainant:

Carlette Duffy

████████████████████
Indianapolis, IN 46202

2. Complainant Representative:

Fair Housing Center of Central Indiana
Amy Nelson, Executive Director, #811
445 N. Pennsylvania Street
Indianapolis, IN 46204

3. Other Aggrieved Parties:

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

- Discriminatory financing (includes real estate transactions)

5. The alleged violation occurred because of:

- Race
- Color

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

████████████████████
Indianapolis, IN 46202

7. Respondents:

Craig Hodges
Citywide Home Loans
1300 E. Woodfield Road, Suite 302
Schaumburg, IL 60173

Citywide Home Loans, LLC
d.b.a. Citywide Home Loans
c/o Registered Agent Solutions, Inc., Registered Agent

200 Byrd Way, Suite 205
Greenwood, IN 46143

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

Complainant is an African American woman who was interested in refinancing her home mortgage loan. In March 2020, Complainant received a loan estimate of \$148,000 based on her belief her home was valued at around \$185,000.

On or around March 31, 2020, Jeffrey Pierce, of Pierce Appraisal, Inc., visited Complainant's home and conducted the home appraisal. Soon after, Complainant learned that the property was appraised at only \$125,000. Subsequently, Complainant purchased a market analysis for her home through [REDACTED], which gave a possible list price for her home at \$187,000. Despite forwarding this analysis to the lender, the lender communicated via email on April 30, 2020, that "after reconsideration of the appraisal and the documentation... provided, the appraiser states the value will remain at \$125,000."

Complainant states that the subject property is located in a historically African American neighborhood in Indiana. Complainant believes Mr. Pierce was purposely pulling comps for the appraisal that were not fair and were racially motivated. Further, the day Mr. Pierce came to conduct the appraisal, Complainant had pictures of her and her Black family throughout the home.

On or around October 2020, Complainant reached out to [REDACTED] and began the refinancing process with them. Complainant did not indicate her race and kept all interactions with the appraiser via email. Complainant removed all of the pictures of her and her family and had a White friend pose as her brother during the appraisal. On November 4, 2021, an appraisal was conducted. The appraisal valued the home at \$259,000.

Complainant alleges Respondents discriminated in the appraising of residential real property by undervaluing her home. Complainant alleges Respondents' actions were based on race and color.

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

April 30, 2020, and is continuing.

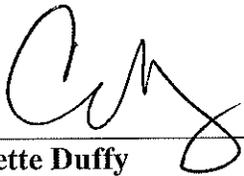
10. Types of Federal Funding Identified:

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

805 of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Act of 1988.

Please sign and date this form:

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



Carlette Duffy

3/29/21

Date

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

Amended Housing Discrimination Complaint

Case Number: 05-21-2277-8

HUD Filing date: March 29, 2021.

1. Complainant:

Carlette Duffy

████████████████████
Indianapolis, IN 46202

2. Complainant's Representative:

Fair Housing Center of Central Indiana
Amy Nelson, Executive Director
445 N. Pennsylvania Street, #811
Indianapolis, IN 46204

3. Other Aggrieved Parties:

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

- Discriminatory financing (includes real estate transactions)

5. The alleged violation occurred because of:

- Race
- Color

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

████████████████████
Indianapolis, IN 46202

7. Respondents:

Jeffrey Pierce
8444 E County Rd. 851 South
Plainfield, IN 46168

Pierce Appraisal, Inc.
c/o Jeff Pierce, Registered Agent
8444 E County Rd. 851 South

Plainfield, IN 46168

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Complainant is an African American woman who was interested in refinancing her home mortgage loan. In March 2020, Complainant received a loan estimate of \$148,000 based on her belief her home was valued at around \$185,000.

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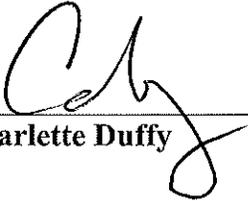
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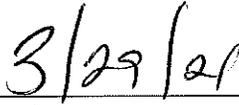
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Carlette Duffy



Date

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Amended Housing Discrimination Complaint

Case Number: 05-21-2270-8

HUD Filing date: March 29, 2021.

1. **Complainant:**

Fair Housing Center of Central Indiana
Attn: Amy Nelson
445 N. Pennsylvania Street, Suite 811
Indianapolis, IN 46204

2. **Complainant Representatives:**

3. **Other Aggrieved Parties:**

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

- Discriminatory financing (includes real estate transactions)

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

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

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Indianapolis, IN 46202

7. **Respondents:**

Craig Hodges
Citywide Home Loans
1300 E. Woodfield Road, Suite 302
Schaumburg, IL 60173

Citywide Home Loans, LLC
d.b.a. Citywide Home Loans
c/o Registered Agent Solutions, Inc., Registered Agent
200 Byrd Way, Suite 205
Greenwood, IN 46143

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

The Fair Housing Center of Central Indiana (FHCCI) is a private, nonprofit fair housing organization whose mission is to ensure equal housing opportunities by eliminating housing discrimination through advocacy, enforcement, education, and outreach. On October 3, 2020, the executive director at FHCCI, Amy Nelson, spoke at a meeting of the Concerned Clergy of Indianapolis. During this meeting, Ms. Nelson provided information on fair housing including sharing a recent *New York Times* story about a biracial couple who believed they had received a discriminatory appraisal. Ms. Nelson expressed that the FHCCI wanted to investigate these issues if they were happening in the Indianapolis community. At the end of Ms. Nelson's presentation, Carlette Duffy spoke up stating that she may have experienced discrimination in her recent attempt to refinance her home. Ms. Nelson asked Ms. Duffy to contact her and provide her with copies of the appraisals.

On November 30, 2020, Ms. Nelson spoke with Ms. Duffy about her experience. The FHCCI later opened an investigation to investigate her allegations of discrimination due to race and color. Ms. Duffy later shared that she had been notified on April 30, 2020 that the lender and appraiser were refusing to change her appraisal amount. As part of FHCCI's investigation, the FHCCI analyzed Ms. Duffy's appraisal and lending industry, requirements, and best practices. In addition, they conducted research into other fair housing cases involving allegations of discriminatory appraisals. Finally, they provided fair housing counseling to Ms. Duffy on her rights under law and assisted her in filing a fair housing complaint.

The FHCCI alleges that the Respondents have violated fair housing laws by allowing race and color to impact their appraisals and/or lending practices. The FHCCI expended resources to investigate and counteract the Respondents' practices. The time and resources the FHCCI spent investigating this matter diverted resources from its other daily activities such as education and outreach, client counseling, and community development. Further, the FHCCI alleges the Respondents' conduct has frustrated the FHCCI's mission to rid its service area of housing discrimination.

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

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10. Types of Federal Funding Identified:

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of Central Indiana**



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Case Number: 05-21-2278-8
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Fair Housing Center of Central Indiana
Attn: Amy Nelson
445 N. Pennsylvania Street, Suite 811
Indianapolis, IN 46204

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8444 E County Rd 851 South
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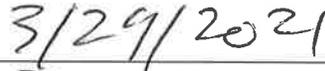
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