



Entry Form 2017 Annual Awards for Program Excellence

Entry Deadline: Thursday, June 15, 2017, Midnight ET

Each entry must include a completed entry form. Please complete a form for each entry your HFA is submitting. The completed entry form will become the first page of your entry.

This form is a fillable PDF. Type your information into the entry form and save it as a PDF. Please do not write on or scan the entry form. **Questions: Call 202-624-7710 or email awards@ncsha.org.**

Entry Title: Enter your entry's title exactly as you wish it to be published on the NCSHA website and in the awards program.

Category:

Subcategory:

Entry Summary: A 15-word (max) summary of the program, project, or practice you are entering.

HFA:

HFA Staff Contact:

Phone:

Email:

Visual Aids:

Are you mailing to NCSHA 10 copies of any visual aids that cannot be included in your entry PDF? Yes No

Payment:

My HFA is mailing a check to NCSHA.
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Dissecting and Deterring Foreclosure Rescue Schemes Using Data Modeling

Response to an Important State Need:

An unsettling trend arising from the increase in home foreclosures since 2008 is the appearance of more “foreclosure rescue schemes” (FRS) that on the surface appear to be legitimate or even sometimes government approved, but turn out to be ways for unscrupulous people to prey on unsuspecting families who find themselves facing foreclosure. Fraudulent mortgage foreclosure operations prey on distressed and desperate homeowners, promising false forbearances, unfeasible write-downs and bailouts while charging exorbitant fees for services they will not provide.

The Maryland Department of Housing and Community Development (DHCD) in partnership with the Maryland Department of Labor, Licensing and Regulation (DLLR) are the lead agencies that would address this concern. DHCD has the resources and programs that fund housing counselors throughout the state and to market these programs (via media and through events) to the general public. DLLR is the enforcement arm that in Maryland regulates the banking industry and investigate complaints of abusive practices. Despite aggressive efforts on the part of these agencies, foreclosure schemes and irregularities (such as the foreclosure processes not being followed according to law) have left some vulnerable populations targets for foreclosure. Since data on enforcement actions is less accessible due to privacy/legal concerns and can take years to move through the legal process, DHCD wanted to focus on prevention of FRS by understanding who, where and how FRS operations target Maryland residents and strategies/best practices to thwart FRS operations.

Innovative Response:

In partnership with DLLR, DHCD worked with the University of Maryland Smith School of Business to obtain a team of executive MBAs who conducted evaluations of existing programs and best practices in the field as well as focus groups of stakeholders. In addition, the Smith School and DHCD Housing & Economic Research Office (HERO) triangulated data from different sources available to Housing Finance Agencies to identify populations targeted by FRS operations. (The partnership with academia, utilized for this project was a NCSHA HR Innovations winner in 2014.)

Through DLLR, a sister-state agency, DHCD was introduced to the non-partisan/non-profit Lawyer's Committee for Civil Rights Under Law that has a national database of foreclosure rescue scheme and loan modification complaints across the nation since April 2008 (<http://www.preventloanscams.org/about-us/loan-modification-scam-prevention-network>). Through this relationship, DHCD was granted access to 1400 consumer complaints tracked by the Lawyer's Committee from April 2008 to February 2014. 1380 of the cases reported offers of foreclosure relief/consulting services, but it was not verified that these consumers were also in foreclosure. To triangulate the data while adhering to privacy concerns of the Lawyer's Committee, HERO matched the addresses in the complaint data with Mortgage Bankers Association data on Notices of Foreclosure to identify those Maryland residents that both were in foreclosure AND filed a consumer complaint about FRS. With this streamlined data set of about 200 and access to US Census Bureau data, the Smith School conducted its data regression analyses and data normalization (in order to ensure variations in county population size and demographics were taken into account) to determine if there were significant factors that made a certain population more attractive to FRS operations.

Specifically, the following attributes were analyzed for possible statistical significance, if any: % distribution by race;% distribution by age group; % of Foreign born population; % of English not primary language; % of Veterans; % Below Poverty Rate; % with at least a Bachelors degree; median household income; population growth; and the unemployment rate. The Smith team also analyzed characteristics of the homes, the mortgages and the foreclosure rescue schemes (FRS) to determine if any

patterns emerged, including the following data elements: Total Housing units; Home ownership rate; Median home price; Affordability Average Amount owed on home; Average Days past due on mortgage; Total households with Notice of Intent (NOI); Owner occupied vs investment; Number of Foreclosure Rescue Schemes (FRS) reported; FRS Organization Names; FRS origin stat; and Lender information (both Loan servicer and secured Party)

The results of the data modeling were surprising. To validate the findings, a focus group with partners "on the ground" was conducted and organized by DHCD's Outreach office, HERO and the Smith School. This included housing counselors, large churches in the state, local government housing authorities and ethnic organizations that serve Maryland residents who are facing foreclosure.

Achievement of Intended Results:

From the start, it was anticipated that geographical areas with the highest foreclosure rates would have high concentrations for FRS and that the most typically vulnerable populations would be the targets (elderly, disabled veterans, less educated, limited income). The study turned this notion on its side.

Of all the elements tested, four were statistically correlated to increases in FRS: (1) areas where the median home price values were higher/increased, (2) areas where the amount owed on mortgage was higher/increased, (3) areas with higher/increased number of African Americans, and (4) areas with higher concentration of households where English is not the primary language. *FRS increases were not correlated to high foreclosure areas, age or limited education/income.* 39% of victims were in age group 36-50 followed by 37% in age group 51-65.

In fact, looking at Prince George's County (in the Washington suburbs), the county with the most FRS reported at over 33%, higher incomes, higher home prices and higher education all seem to be attractive to FRS operations. Specifically, the median income in 2014 in Prince George's County was \$91,206; median home price was \$332,386; % Bachelors degree attainment was 32%; and poverty level at 4.6%. These metrics were significantly higher than Baltimore City with a similar minority demographic, but median income much lower at \$38,358; median home price at \$154,296; % Bachelors degree attainment at 16% and poverty at 21.1%.

While the statistical findings were perplexing to the researchers, the focus group of advocates that are closest to the ground on this issue independently validated the results as follows:

- *Shame* - many of those scammed looked at FRS as a fee for service, such as hiring someone to do income taxes. Conversely, there is skepticism about free services ("you get what you pay for" mentality) and saving one's home is extremely emotional/important. Most likely being college educated, and making a decent salary, victims are embarrassed that they were scammed. FRS offer anonymity as consumers do not have to go to an office to seek help.
- *Messaging* - FRS message is simple - "rescue me" and a "guarantee of success" that is recurring on radio and late night TV ads. Official/government looking documents and seals are used in mailers. There is a grey line between legitimate legal services and scams in this field so it is hard to advise consumers and difficult to prosecute violators.
- *Immigrant populations*- consumers in households where English is a second language often turn to others in their linguistic/cultural communities for help since they are not aware of other mainstream channels of assistance. This puts them at greater risk for FRS and a number of partners have dealt with such cases around the state.

From the eye-opening discoveries the Smith School also delivered recommendations and best practices to mitigate FRS operations in the state:

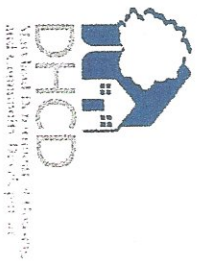
- Gear up Maryland's foreclosure assistance program, HOPE, to raise awareness of FRS.

- Communicate a united message (what to do when scammed) on all websites and social media of state local and non-profit stakeholders.
- Utilize partner's web "real-estate" in ads, etc. and make web search words work for DHCD.
- Increase multi-lingual access to information about assistance - Hispanics took the longest to report scams, and it is speculated because they are not aware of where and how to report FRS.
- Make standardized online complaint filing widely available (FTC model: <https://www.ftc.gov/enforcement/consumer-sentinel-network>)
- Call on bar associations to issue ethics alert to members to avoid involvement with scammers.
- Look at adopting national standards for homeowner education/counseling, such as NeighborWorks network.
- Consider Pennsylvania's HEMAP model to assist homeowners in foreclosure trouble.

Summary of the FRS full findings and recommendations/best practices from the research study is attached. It is anticipated that DHCD and DLLR will be able to use the findings and recommendations/best practices to improve outreach efforts as well as help DLLR with law enforcement techniques. It also takes a very emotionally charged issue (losing one's home) and puts facts behind anecdotal cases to devise a cohesive strategy to deter FRS and educate home owners.

Benefits that Outweigh Costs:

- *Working together to look at data and joint state missions that provide insight not available without partnership:* DHCD and DLLR were presented with research and recommendations that can be pursue as determined by DHCD/DLLR leadership. This study took over a year to conduct (from Spring 2014 to Fall 2015) and would not have been possible without the partnerships of DLLR and the University of Maryland Smith School taking different facets of research and databases to come up with tangible findings and actionable items.
- *Cost effective:* This project tapped into a resource (Memorandum of Understanding with the University of Maryland Smith School of Business) to have work completed for free and without holding up other assignments/routine work of state agencies. This study would have cost DHCD hundreds of thousands of dollars if put to bid for contracting to conduct. Instead, the MBA students received course credit for the project at no cost to DHCD.
- *Quantifying and qualifying the problem which helps with legislative decisions for resources:* DHCD will be able to utilize the study to better quantify and qualify the issue of foreclosure rescue schemes in the state from an objective source. The results showed that it was not the typical populations targeted for scams (such as seniors, less educated, limited income, etc), but a new segment of the population that can be identified for outreach. This also allow for better coordination with elective officials who now can objectively make claims for resources.
- *Baseline research for future studies:* The study also sets a baseline for future studies and to see how FRS activity is trending. It also can serve as a tool to see if certain mitigation initiatives are working for the state. Even if the results of the study proved not to be statistically significant, it still validated that the efforts of the department have been as effective as could be expected.



Report to the Department of Housing and Community Development on Foreclosure Rescue Scams

Smith Sentinels

Robert H. Smith School of Business

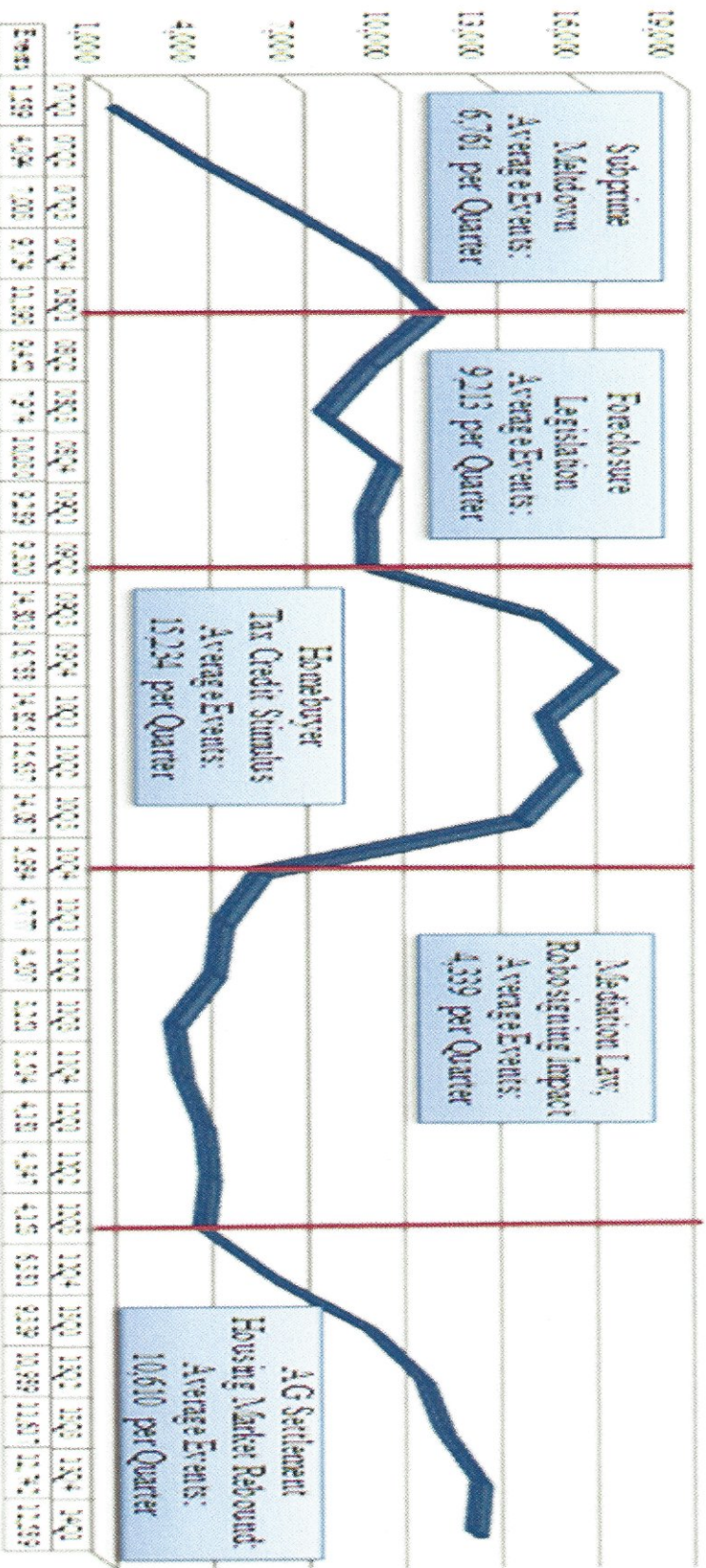
Recent Growth in Maryland Foreclosures was Triggered

by Housing Market Rebound

(source: Realty Trac/ graph courtesy DHCD)



Total Foreclosure Activity in Maryland 2007:Q1-2014:Q1



Project Scope and Limitations

SCOPE

- The study defines what constitutes foreclosure rescue schemes (FRS) and identifies through data analysis, characteristics of the populations in Maryland that are most vulnerable populations.
- Conducted evaluation of existing programs/resources and research into best practices of other government and non-profit programs; including meetings/interviews with stakeholders and national, state and local officials engaged in combating FRS.
- Researched innovations to combat fraud/scams from other sectors; interviews were conducted with other industry innovators (example: AARP) to learn if strategies utilized in other industries may apply to FRS.
- The report is focused on the scam prevention side. Data on enforcement actions is less accessible, and enforcement efforts can take years to move through legal process.



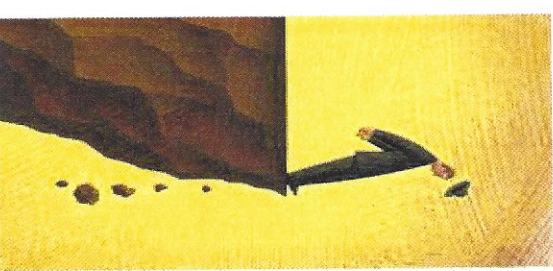
Scope of work

Project Scope and Limitations

(cont'd)

LIMITATIONS

- **Challenging and difficult to quantify exact numbers of victims of foreclosure rescue schemes** because people are (1) embarrassed to report that they have been scammed, (2) are wary of being scammed again and (3) do not understand that they are victims of scams, since some in the legal community perpetrate scams that seem legitimate.
- The state of **Maryland does not keep a comprehensive database** of consumers who have been victims of FRS that is open to the public (law enforcement may have a database).
- There is no clear distinction between loan modification scams, foreclosure rescue scams when we see after effects. For purposes of our research we are considering the scams where the **victims have BOTH reported being scammed and are officially in the foreclosure pipeline** (received at least one Notice of Intent - NOI).

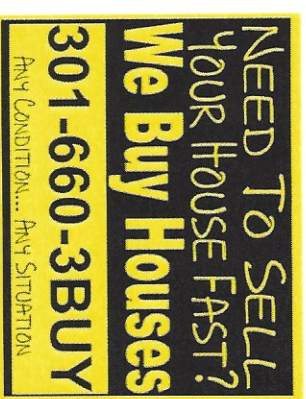




How Rescue Scams Work



- Rescue scammers prey upon vulnerable homeowners who:
 - Have become **delinquent** on their mortgage
**** Avg 483 days default-to-scam**
 - Experience a period of **denial** – limited to no contact with lender or servicer, feeling of no options or unfamiliar with options
 - Become **desperate** when the foreclosure process begins and has no apparent ending



Tactics used by Scammers

- Individuals and companies including “legal entities” that promise help
- “Foreclosure consultants” or “foreclosure rescue specialists”
- Troll public foreclosure notices
- Saturation sales and marketing
 - Street signs, billboards, direct mailings
 - TV, radio, newspapers, Internet
 - English and Spanish
- Direct contact
 - Phone calls, interviews, foreclosure events



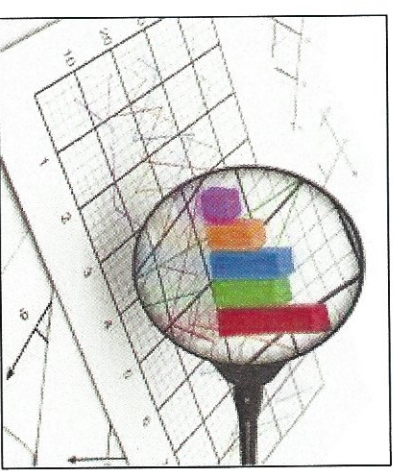
Common Types of Rescue Scams

- **Phantom Help** – Scammer charges exorbitant fees, promises to contact lender, submit paperwork on behalf of homeowner; these representation, services never materialize.
- **Bailout** – Homeowner surrenders title, begins paying rent to scammer with promise they can buy home back.
- **Bait and Switch** – Homeowners believe they are obtaining a new loan; however signing over ownership to scammer, leaving homeowner still making mortgage payments.



Data Collection and Analysis

- Reviewed and analyzed data to identify **population demographics** impacted by foreclosure rescue schemes and why certain population may be so vulnerable to these types of schemes.
- **Data Sources:** U.S. Census, Lawyer's Committee for Civil Rights Under Law, Mortgage Bankers Association
- Utilized **statistical analysis** as well as **data normalization** to ensure county population size and demographic variability were taken into account.



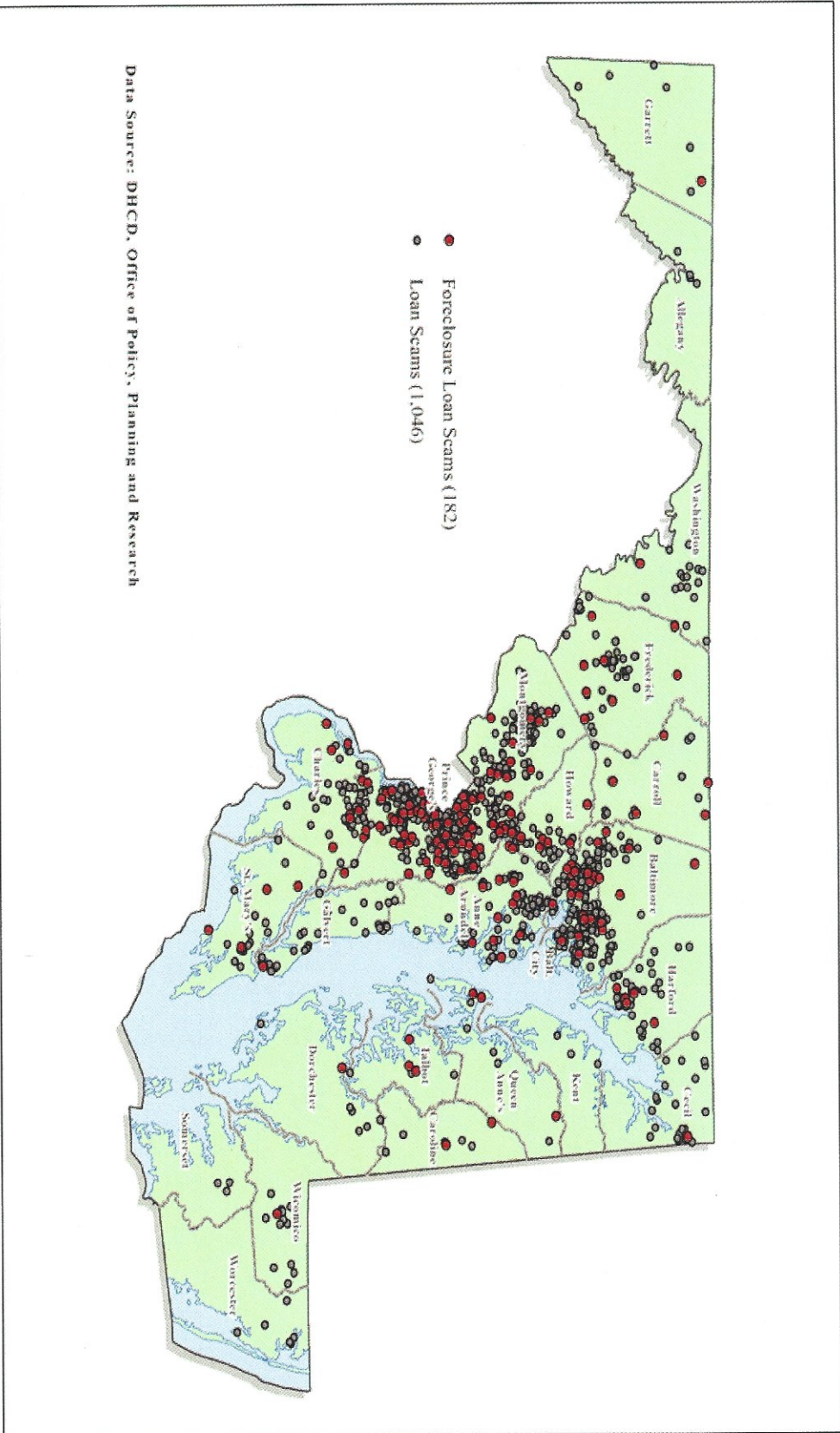
Key points from raw data

- 1400 scams related to home loans and foreclosure reported in MD from May 2007 thru Jan 2014.
- 380 of these scam incidents reported that they were offered Foreclosure Relief/Consulting as a service.
- 198 of the reported victims also received delinquent notices for foreclosure.
- 33% of the scams reported were by homeowners of Prince George's County (highest number of reported incidents among counties) followed by Baltimore City, 14%, and Baltimore County, 10%.
- Scamming agencies adopt names that sound as if there is a connection to financial, legal or government agencies.



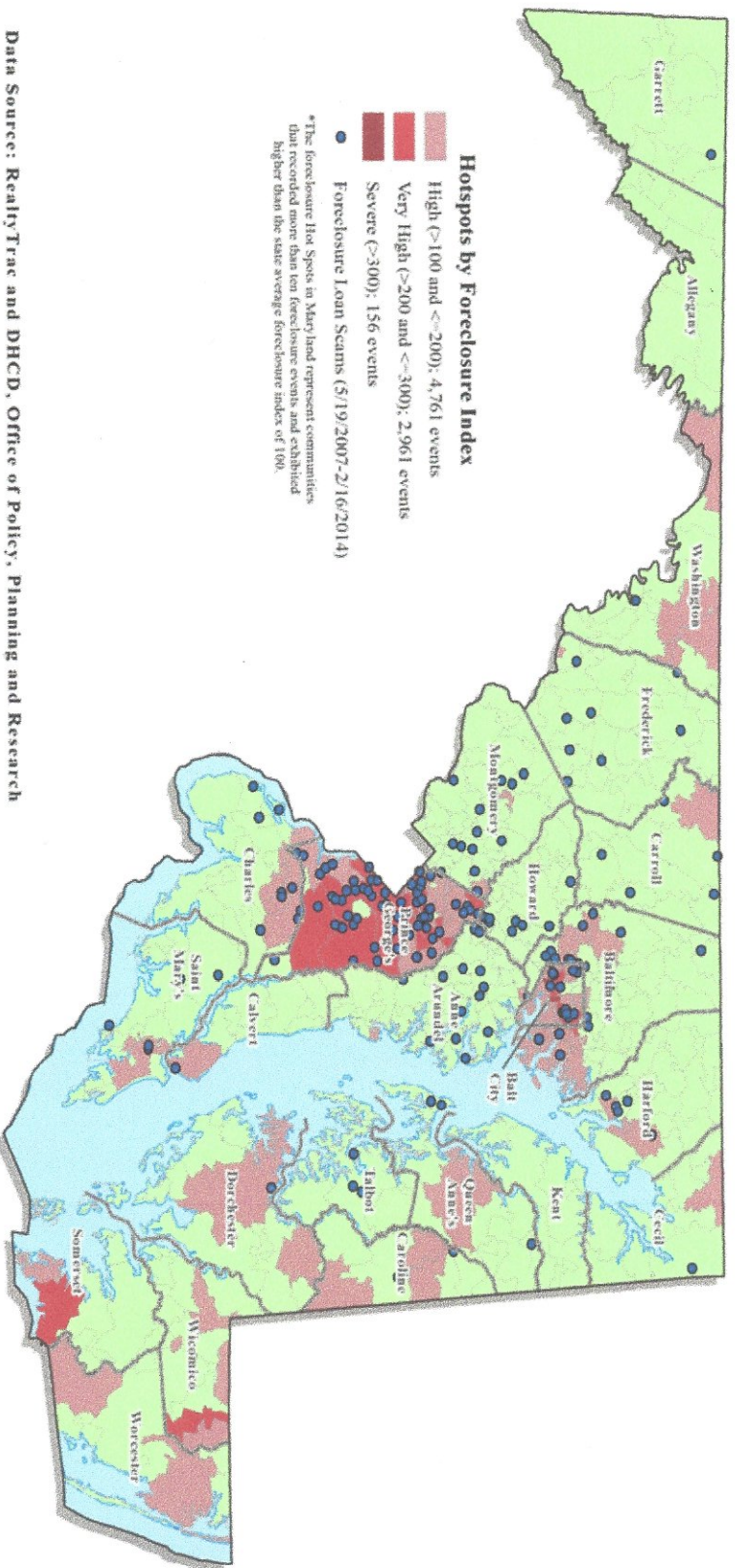
Map of Raw Data for Total Loans and Scams

Loan Scams in Maryland:
5/19/2007—2/16/2014



Foreclosure Loan Scams Do Not Directly Correlate to Areas Hardest Hit by Foreclosures

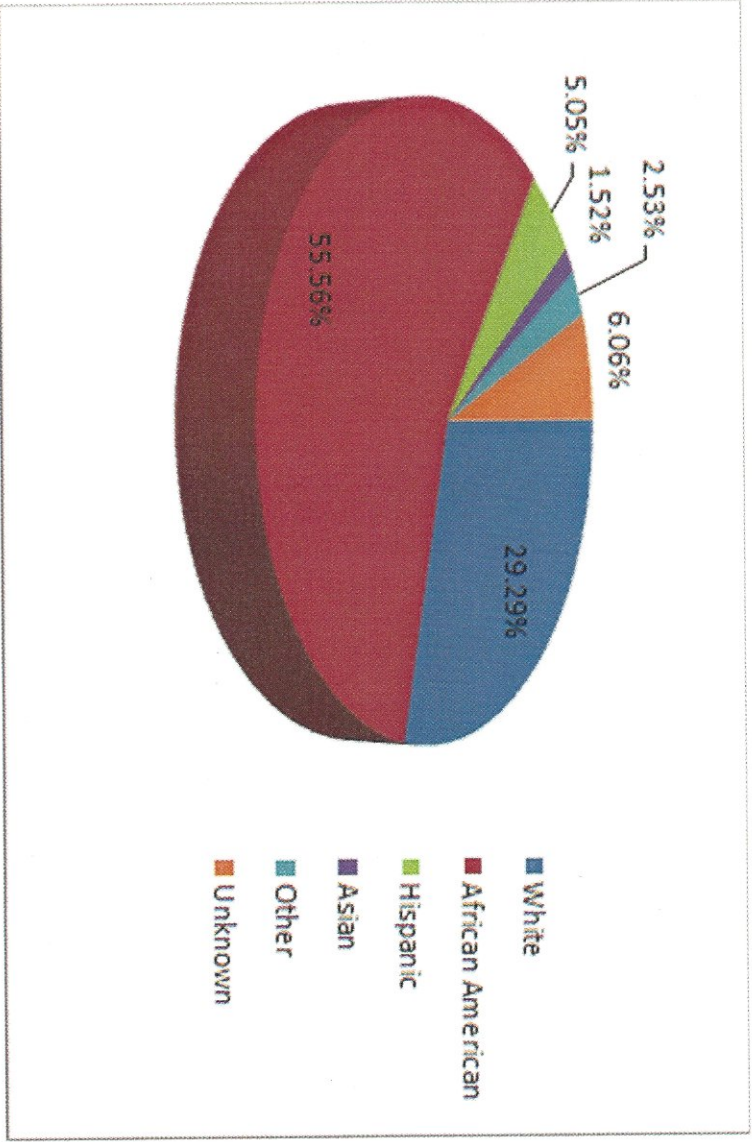
FORECLOSURE HOT SPOTS in MARYLAND 1st Quarter 2014



Data Source: RealtyTrac and DHCD, Office of Policy, Planning and Research

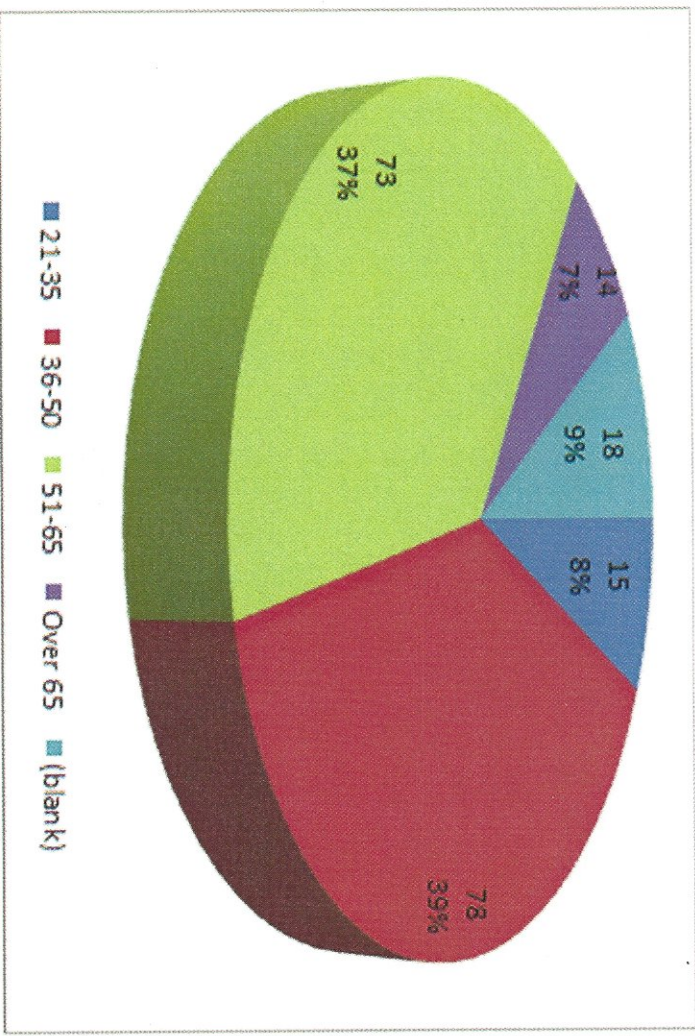


Share of Scams by Race/Ethnicity





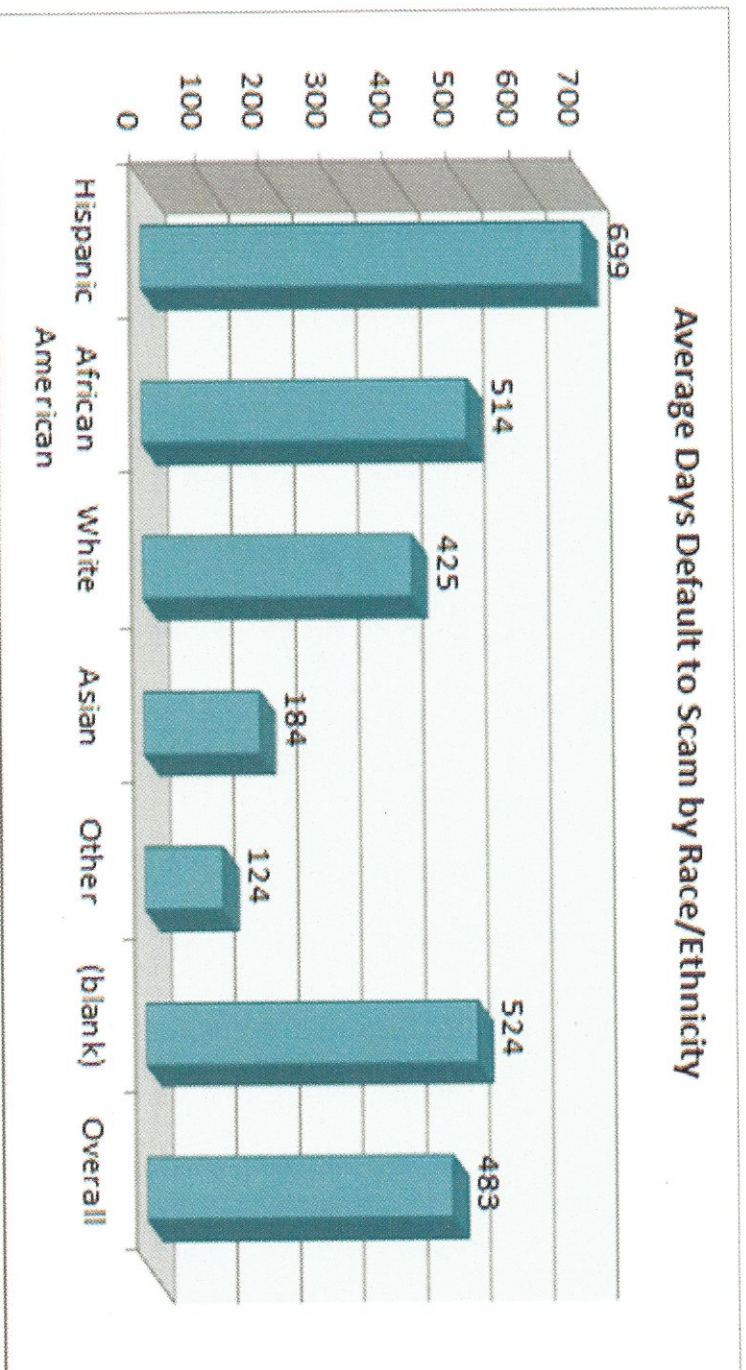
Share of Scams by Age Group



Distribution of Scams by Race/Ethnicity & Age Group

Race/Ethnicity	Age Group				
	21-35	36-50	51-65	Over 65	Blank
Asian	0.0%	2.6%	1.4%	0.0%	0.0%
Black or African American	60.0%	62.8%	50.7%	50.0%	44.4%
Hispanic or Latino	13.3%	6.4%	2.7%	0.0%	5.6%
White	13.3%	24.4%	34.2%	50.0%	27.8%
Other	13.3%	3.8%	11.0%	0.0%	22.2%
All Cohorts	100.0%	100.0%	100.0%	100.0%	100.0%

Hispanics/Latinos Take the Longest to Report Scams

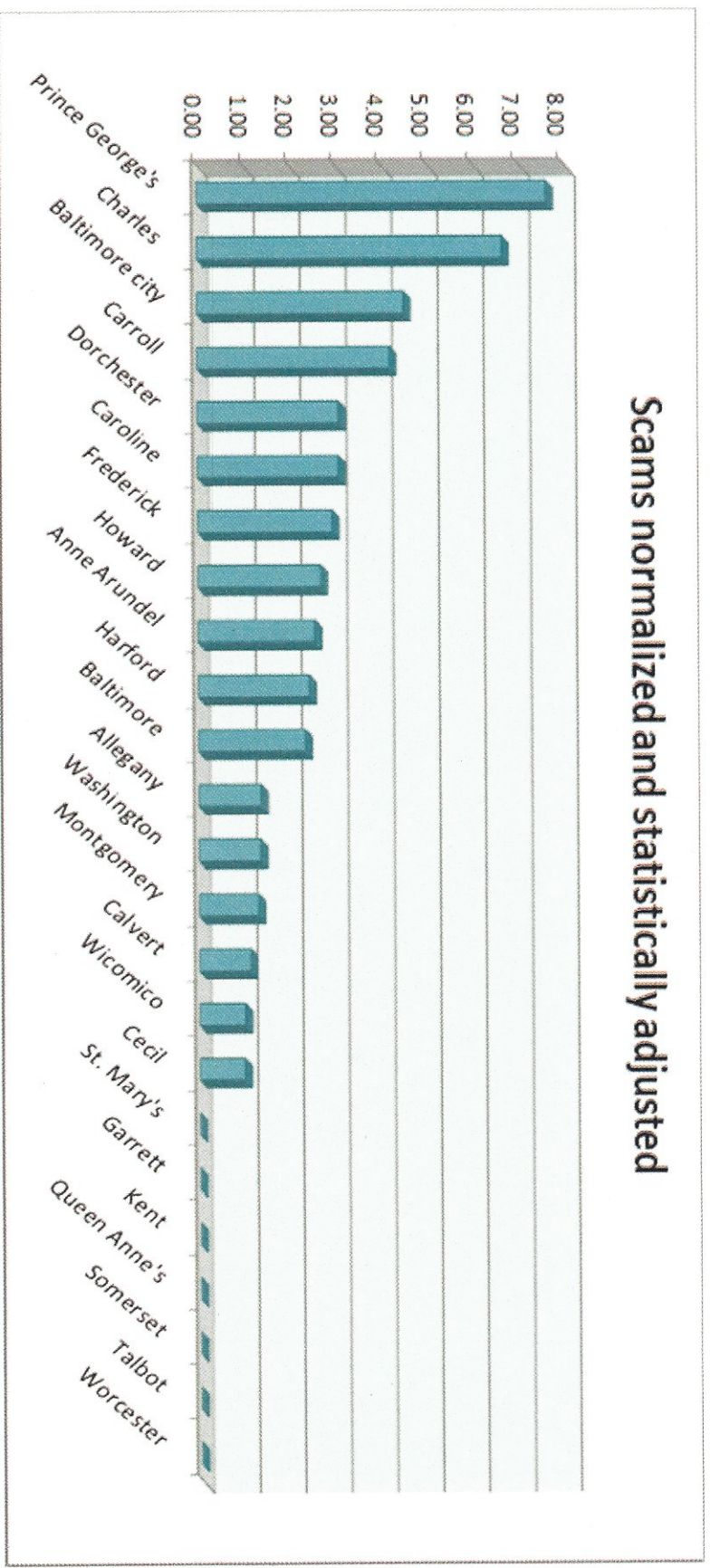


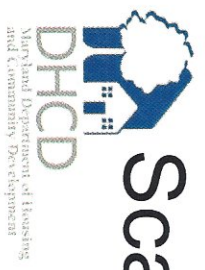


Penetration of Scams by County



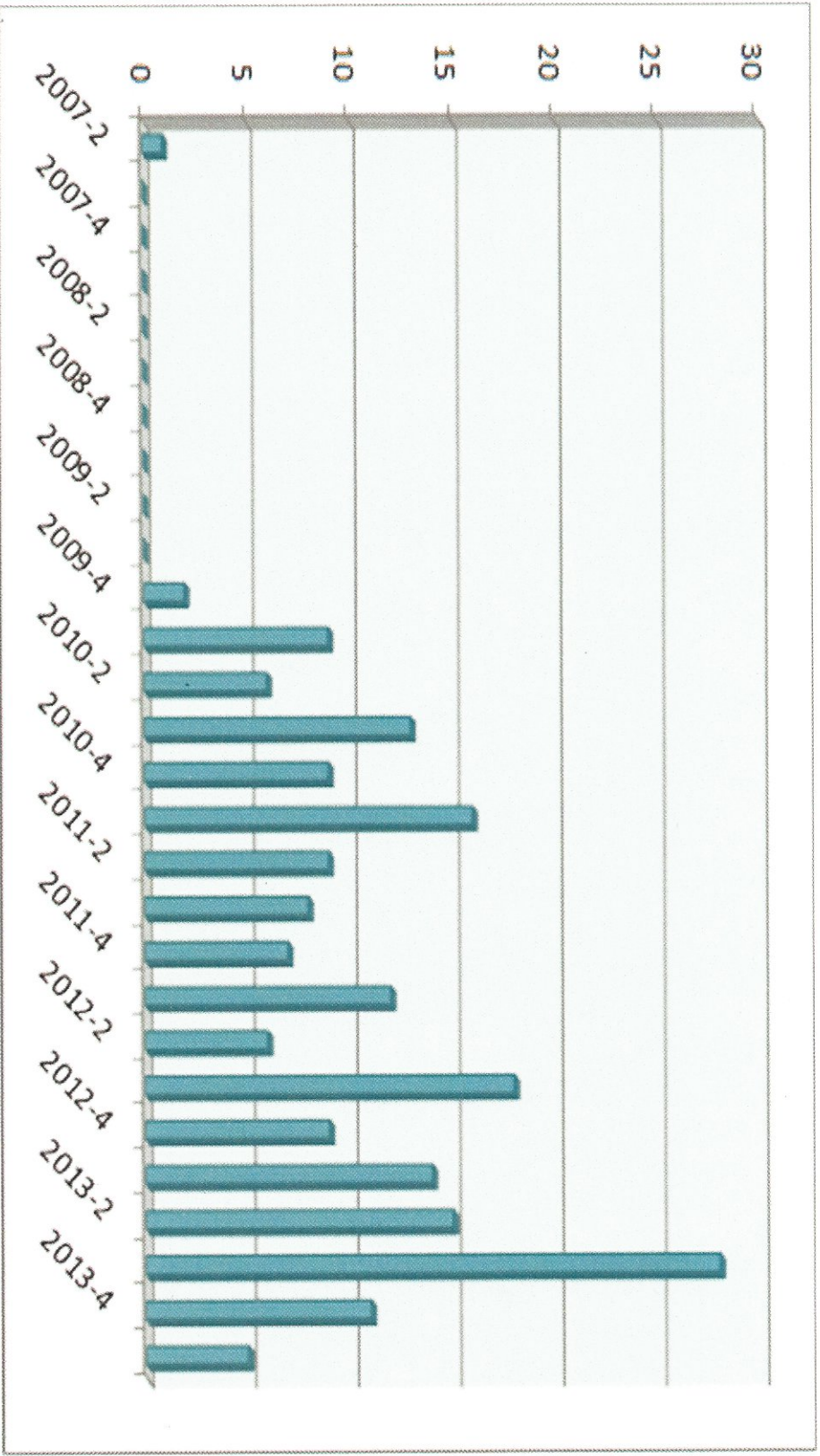
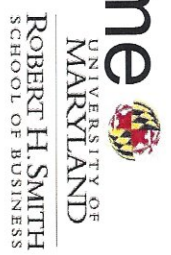
Scams normalized and statistically adjusted





Scams Trending to Increase over Time

Years: 2007 - 2014



Data Analysis Findings

- African Americans most impacted statewide (56%), followed by White (29%) and Hispanic/Latino (5%)
- Prince George's, Charles and Baltimore City show higher penetration of foreclosure rescue scams when the data is normalized and statistically adjusted.
- Age group most affected -- 36-50 year olds, closely followed by 51-65 year olds, then 65 and older
- Higher median home price, higher average amount owed, and higher incidence of English as a Second language are also statistically significant
- Reported Hispanic/Latino numbers may be low due to under-reporting, language barriers/limited language resources
- Reported scams continued to rise in Maryland from 2007 to 2014

Other stakeholder groups

- Lawyers Committee for Civil Rights - launched national online standardized complaint collection system, maintains largest national database of distressed homeowners scammed by FRS.
- AARP educates its' members to be aware of red flags indicating a fraud or scam using all platforms -- print, electronic media, interactive website, counseling.
- Housing, community non profit groups serve key role as front line contacts, need two way communication with government to insure info exchanged on new trends, tools.

Other stakeholder groups

- Veterans Affairs - advises VA homeowners to work with the lender's Loss Mitigation departments to pursue options such as **loan modification, forbearance plan, repayment adjustments, short sale or deed in-lieu of foreclosure**
- Immigrant groups - operate community boards, internet portals for awareness and outreach. Community lawyers could play an important role for fraud detection and protection.
- National security - use artificial intelligence natural language programming to find targeted information on the internet. This can help law enforcement track scammers on the web.



State of Maryland's Programs to prevent scams

HOPE- Home Owners Preservation Equity.

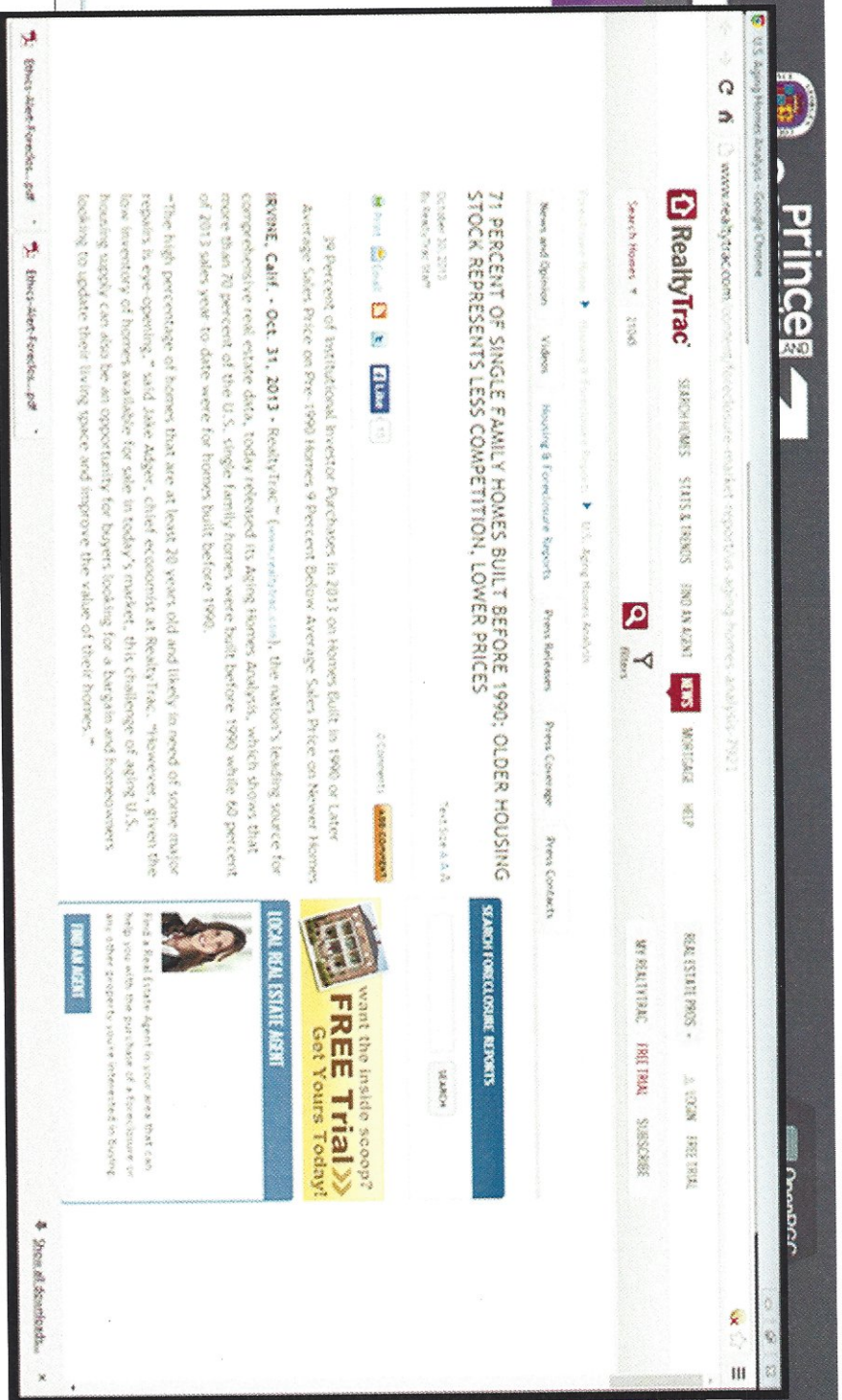
HOPE is currently the state of Maryland's initiative and first line of defense to help homeowners avoid foreclosures.

HOPE has not historically had as a primary focus to raise awareness or prevent foreclosure rescue scams, however, a qualitative analysis of the MD HOPE program, shows that it is well situated to play a more active role in this process.

Recommendations

Marketing & Research

- UTILIZE PARTNERS' WEB REAL-ESTATE
Leverage existing websites to alert, educate homeowners on
foreclosure rescue scams, ways to avoid them



The screenshot shows a web browser displaying a RealtyTrac article. The article title is "71 PERCENT OF SINGLE FAMILY HOMES BUILT BEFORE 1990: OLDER HOUSING STOCK REPRESENTS LESS COMPETITION, LOWER PRICES". The article text discusses the impact of older housing stock on the market, noting that homes built before 1990 represent 70 percent of the U.S. single family homes inventory. It also mentions that the high percentage of homes that are at least 20 years old and likely in need of some major repairs to ease operating costs. The article is dated October 30, 2013, and is by Rachel Wake State.

Below the article, there are several promotional banners:

- SEARCH FORECLOSURE REPORTS**: A blue banner with a search icon and the text "SEARCH FORECLOSURE REPORTS".
- Want the inside scoop? FREE Trial! Get Yours Today!**: A yellow banner with a house icon and the text "Want the inside scoop? FREE Trial! Get Yours Today!".
- LOCAL REAL ESTATE AGENT**: A banner featuring a woman's photo and the text "Find a local estate agent in your area that can help you with the purchase of a foreclosure or any other property, secure interested in buying." and a "FIND AN AGENT" button.

The browser's address bar shows the URL: www.realtytrac.com/content/foreclosure-market-report-us-aging-homes-analysis-1921. The browser tabs include "Princeton" and "Show all search results".

Recommendations

Marketing & Research

3. MAKE SEARCH WORDS WORK FOR YOU

Improve searchability of MD HOPE - Google phrases, keywords

- “Can I skip my mortgage payment”
- “Got a delinquent payment”
- “Notice of Intent”
- “My house could be foreclosed”
- “Prevent (or avoid) foreclosure of my home”

4. MULTI-LINGUAL CAMPAIGN

Increase multi-language collateral/advertising - brochures, forms, ethnic radio/TV channels, web

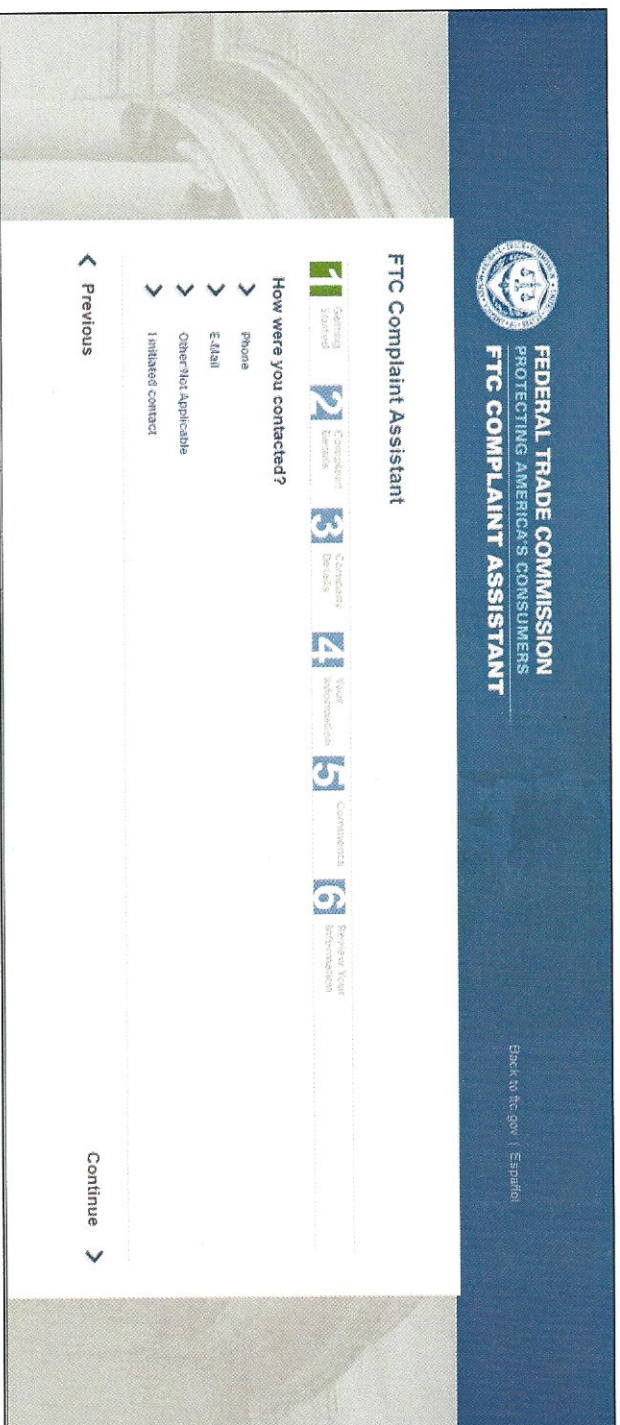


Best Practices



1. MAKE STANDARDIZED ONLINE COMPLAINT FILING WIDELY AVAILABLE

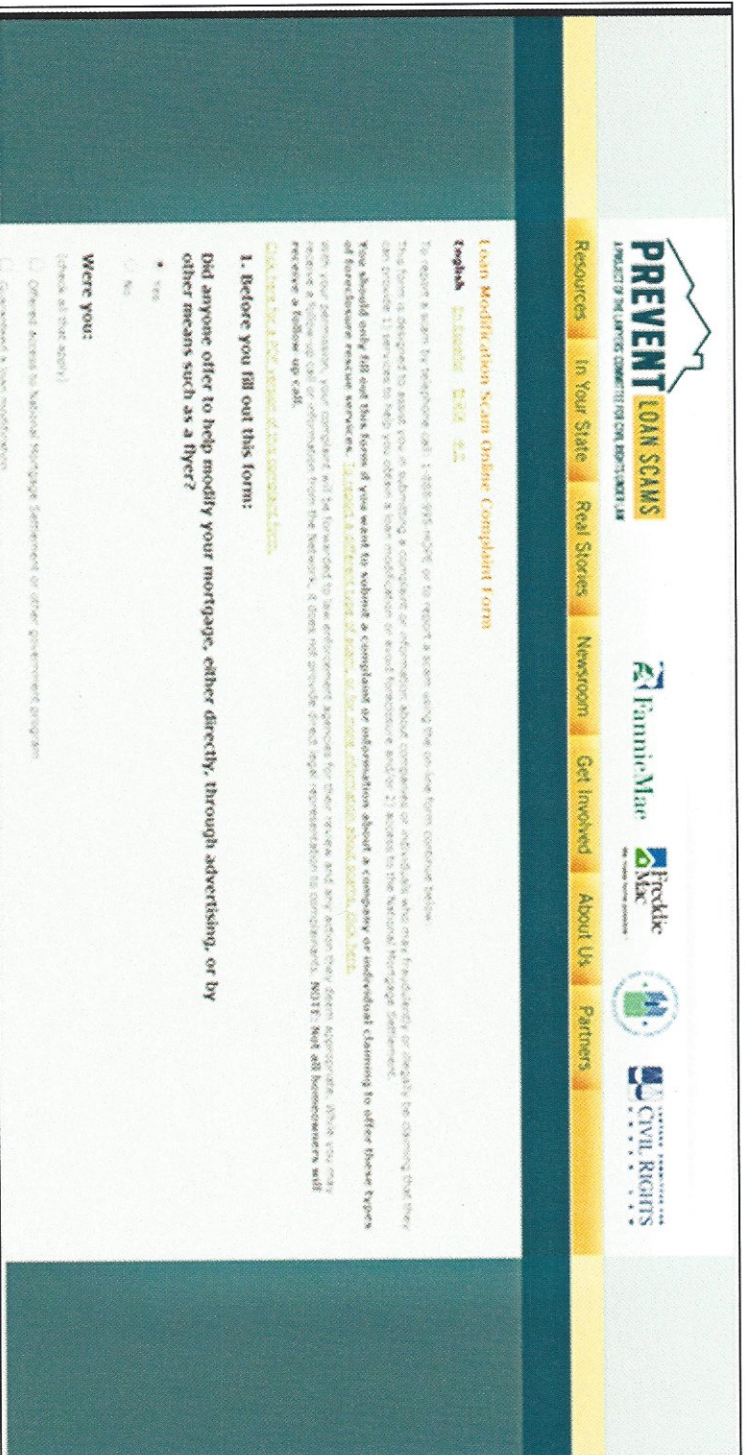
FTC model uses an automated “complaint assistant” to help consumers through the process. FTC also has on its page a blog/comments from other consumers warning about real time scams.



<https://www.ftccomplaintassistant.gov/GettingStarted?NextQID=251&Url=%23%26panel1-8#crnt>

Best Practices

Online complaints sent directly to FTC Sentinel System



PREVENT LOAN SCAMS
A PROJECT OF THE LAWYERS COMMITTEE FOR CONSUMER JUSTICE

Resources | In Your State | Real Stories | Newsroom | Get Involved | About Us | Partners

FamilyMap | **Freddie Mac** | **CIVIL RIGHTS**

Loan Modification Scam Online Complaint Form

English | [Español](#) | [Português](#) | [Français](#)

To report a scam by telephone call 1-888-985-HELP or to report a scam using the online form continue below.

This form is designed to assist you in submitting a complaint or information about companies or individuals who may be fraudulent or illegally be claiming that they can provide 1) services to help you obtain a loan modification or second foreclosure and/or 2) access to the National Mortgage Settlement.

You should only fill out this form if you want to submit a complaint or information about a company or individual claiming to offer these types of foreclosure rescue services. [Learn More About Us](#) or [View More About Us](#) for more information about our services.

When your submission, your complaint will be forwarded to law enforcement agencies for their review and any action they deem appropriate. Also, you may receive a follow up call for information from the National, if DODS will provide third party representation in complaints. NCHC Staff will communicate with you via email.

Click here for a PDF version of this complaint form.

1. Before you fill out this form:

Did anyone offer to help modify your mortgage, either directly, through advertising, or by other means such as a flyer?

• Yes
• No

Were you:
(Check all that apply.)

Offered access to National Mortgage Settlement or other government program



Best Practices



2. CALL ON BAR ASSOCIATION TO ISSUE ETHICS ALERT TO MEMBERS

Maryland Bar Association, the Maryland Attorney Grievance Commission can educate their members to avoid sanctions BY avoiding involvement with scammers who seek legal “cover.”

ETHICS ALERT
**Legal Services to Distressed Homeowners
and Foreclosure Consultants on Loan Modifications**
*Committee on Professional Responsibility and Conduct
(February 2, 2009)*

You have all read and heard about the residential mortgage crisis in California. In 2007, roughly 84,000 California homeowners lost their homes to foreclosure. Through the first three quarters of 2008 alone, that number increased to over 190,000. During that same period, banks recorded nearly 330,000 notices of default on California home mortgages. According to a survey of defaults in the first half of a non-judicial foreclosure or trustee sale, the most common process in California, which typically takes four to six months or more. In other words, the crisis seems far from over.

Seeking a business opportunity in this crisis, “foreclosure consultants” purport to offer distressed homeowners’ assistance in reviewing their options and/or negotiating loan modifications with their lenders. According to the California Legislature:

These foreclosure consultants, however, often charge high fees, the payment of which is often secured by a deed of trust on the residence to be saved, and perform no service or essentially a worthless service. Homeowners, relying on the foreclosure consultants’ promises of help, take no other action, are directed from lawful businesses which could render beneficial services, and often lose their homes, sometimes to the foreclosure consultant who purchases homes at a fraction of their value before the sale.

Vulnerable homeowners are increasingly relying on the services of foreclosure consultants who advise the homeowner that the foreclosure consultant can obtain the remaining funds from the foreclosure sale if the homeowner executes an assignment of the surplus, a deed, or a power of attorney in favor of the foreclosure consultant. This results in the homeowner paying an exorbitant fee for a service when the homeowner could have obtained the remaining funds from a trustee’s sale from the trustee directly for minimal cost if the homeowner had

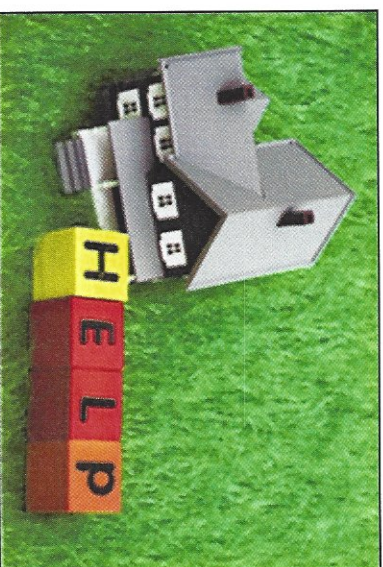
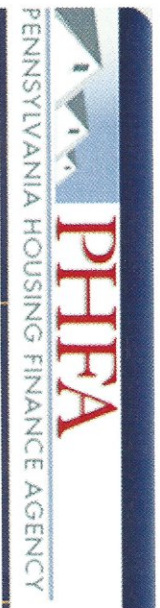
Innovation/Best Practices

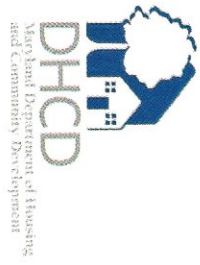
3. INSTITUTE NEIGHBORWORKS BEST PRACTICES

Through technical support and capacity building, help key community agencies in becoming chartered members of the national NeighborWorks network and adopting the National industry standards for homeownership education and counseling.

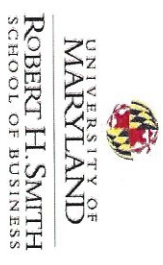
4. CONSIDER HEMAP

- State of PA - Homeowner's Emergency Mortgage Assistance Program
- Homeowners in PA can keep their homes for as low as \$25 a month
 - Program in existence for last 30 years
 - A national model for foreclosure prevention







BACKUP SLIDES

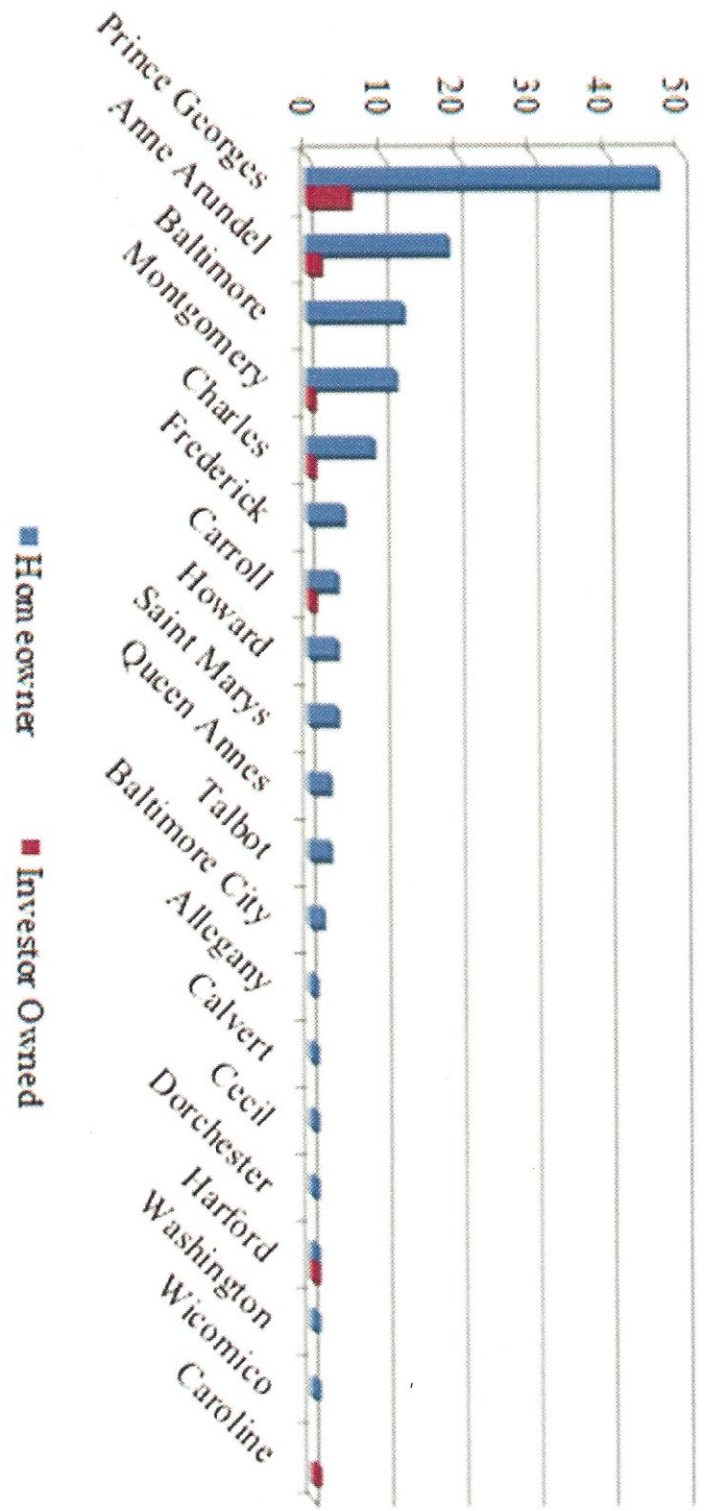


Socio-Economic Characteristics of Communities that Reported Scam Activity

Scam-NOI Link Data

 County Maryland Department of Housing and Community Development	Median Income	Median Home Price	Homeownership Rate	Vacancy Rate	Population Growth 2010-12	Unemployment Rate	% with at Least a Bachelor's Degree	 University of Maryland Robert H. Smith School of Business	
Anne Arundel	\$96,386	\$410,747	78.9%	5.6%	0.5%	5.9%	40.2%	29.0%	4.1%
Baltimore	\$72,610	\$268,524	77.9%	4.6%	0.3%	8.4%	30.0%	38.5%	8.2%
Baltimore City	\$38,358	\$154,296	50.2%	13.9%	-0.3%	14.5%	16.1%	67.4%	21.1%
Calvert	\$85,669	\$290,600	84.5%	11.9%	0.0%	7.7%	24.4%	21.0%	4.6%
Caroline	\$72,176	\$244,700	82.5%	9.2%	0.7%	6.7%	19.9%	14.4%	7.2%
Carroll	\$81,479	\$339,200	87.6%	4.6%	0.5%	5.6%	23.2%	5.8%	4.7%
Cecil	\$58,561	\$261,200	53.6%	5.3%	1.0%	6.3%	25.1%	20.2%	7.5%
Charles	\$63,114	\$308,882	85.7%	7.4%	1.1%	7.7%	18.7%	46.6%	6.4%
Dorchester	\$38,608	\$275,000	47.0%	24.5%	1.3%	8.2%	26.9%	31.5%	11.8%
Frederick	\$99,141	\$375,588	83.1%	4.3%	1.6%	5.1%	39.8%	15.0%	2.3%
Garrett	\$47,500	\$164,700	91.1%	18.8%	0.3%	8.1%	16.4%	5.0%	3.3%
Harford	\$77,632	\$270,200	82.7%	5.2%	0.4%	5.7%	22.6%	31.8%	8.9%
Howard	\$97,844	\$393,722	66.3%	4.9%	0.5%	4.5%	52.0%	50.8%	4.3%
Montgomery	\$102,081	\$476,977	76.3%	3.4%	1.2%	7.6%	50.0%	58.6%	5.6%
Prince George's	\$91,206	\$332,386	79.6%	6.9%	0.6%	8.0%	32.0%	86.1%	4.6%
Queen Anne's	\$77,725	\$308,233	82.6%	9.8%	1.1%	7.1%	28.5%	11.1%	8.0%
St. Mary's	\$80,896	\$319,940	66.2%	8.9%	1.5%	7.3%	24.8%	30.5%	8.6%

Distribution of Scams between Owner Occupied and Investor Properties

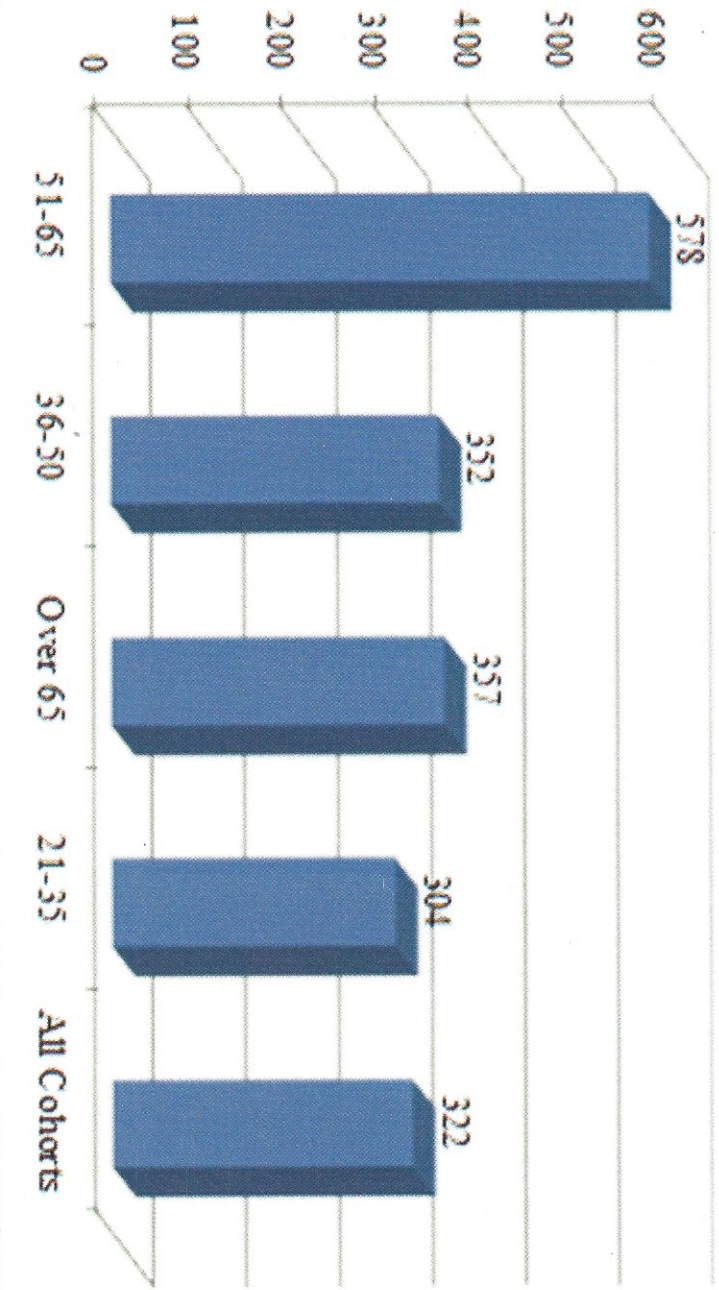




Avg # of Days - Default to Scam by Age Group



Average Number of Days from Default to Scam by Age Group





All Scams Origin State

