

Focus on Fair Lending

NAFCU Regulatory Compliance Seminar

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Overview

- Fair Lending Laws
- Fair Lending Examinations
- Best Practices
- Key Takeaways

WHY?

WHY?

WHY?

- March 2013 NCUA Letter to Federal Credit Unions
— 13-FCU-02
- NCUA Fair Lending Examination Program
- Priority for Consumer Financial Protection Bureau
- Because it is the Law!

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Fair Lending Laws and Regulations

- **Equal Opportunity Act (ECOA)**
as Implemented by Regulation B
- **Home Mortgage Disclosure Act (HMDA)**
as Implemented by Regulation C
- **The Fair Housing Act (FHA)**
- **NCUA Rules and Regulations** Concerning
Non-Discrimination/Real-Estate Related Loans
- **CFPB – Indirect Lending**

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What Are Fair Lending Laws?

- The Equal Credit Opportunity Act (ECOA) prohibits discrimination in any aspect of a credit transaction. It includes extensions of credit.
- The Homeowners Disclosure Act (HMDA) requires financial institutions to meet certain reporting requirements and compile and disclose loan application data.
- The Fair Housing Act (FHA) prohibits discrimination in all aspects of residential real-estate related transactions.

CFPB Focus on Fair Lending

- Fair Lending Report, issued in December 2012
- CFPB Bulletin 2012-04 (outlines the CFPB's expectations on fair lending)
- Memorandum of Understanding on information sharing between the CFPB and Department of Justice
- CFPB Bulletin 2013-02 on Indirect Auto Lending
- Potential CFPB focus on Business Loans and Credit Cards
- CFPB Blog Posts: Fair Notice on Fair Lending

Violations!!!

It is a violation of a fair lending law to express, orally or in writing, a preference based on prohibited factors or to treat applicants differently

Guidance from the NCUA

- Letter to Federal Credit Unions 13-FCU-02
- Fair Lending Guide
- Best Practices Document
- Frequently Asked Questions Document
- Fair Lending Exams and Off-Site Supervision Contacts
 - HMDA Outliers
 - Fair Lending Violations
 - General Compliance Risks
 - Certain “Other Factors”

NCUA's Fair Lending Guide

- It provides a summary of fair lending laws and regulations affecting federal credit unions – ECOA, HMDA and FHA
 - Contains key definitions
 - Overview of Fair Lending Laws and Regulations
 - Discusses the operational requirements of fair lending laws
 - Lists review considerations that management should consider
 - Provides checklists that serve as a starting point for developing fair lending compliance procedures

Comprehensive List of All Fair Lending Documents

http://www.kaufmanandcanoles.com/news/articles/fair_lending_examination_documents.htm

Fair Lending

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What Practices are Prohibited Under Fair Lending Laws?

A lender may not...

- Provide different information or services regarding any aspect of the lending process, application procedures or lending standards
- Discourage or selectively encourage applicants with respect to inquiries about or applications for credit
- Refuse to extend credit or use different standards in determining whether to extend credit
- Vary the terms of credit offered including the amount, interest rate, duration or type of loan by class of applicants
- Use different standards to evaluate collateral
- Treat a borrower differently in servicing a loan
- Use different standards for pooling or packaging a loan in the secondary market

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Overview of the Fair Lending Laws

Types of Lending Discrimination

- Overt Discrimination
 - Lenders generally do not engage in overt discrimination
- Disparate Treatment
 - May be evidenced by statements revealing that a lender explicitly considered prohibited factors
 - Found where difference in treatment are not fully explained by legitimate nondiscriminatory factors
- Disparate Impact
 - Found where lending policies are applied equally, but nevertheless disproportionately disadvantage certain persons on a prohibited basis
 - If there is a disparate impact, the lender must show that the policy or practice serves a legitimate business purpose

Overview of the Fair Lending Laws

(continued)

The Disparate Impact Theory is also known as the “Effects Test”

- Regulation B states that Congress intended the “effects test” concept to be applicable to a lender’s determination of creditworthiness
- Effects test is outlined in the employment field by Supreme Court cases
 - Title VII of the Civil Rights Act of 1964 prohibits discriminatory employment practices
- In applying the discriminatory effects standard
 - Under ECOA, the agencies and courts have used Title VII’s burden-shifting framework
 - Under the Fair Housing Act, HUD and many federal courts have used a burden-shifting approach

Overview of the Fair Lending Laws

(continued)

HUD's Proposed Rule on Discriminatory Effects Standard

- Would establish uniform standards for determining when a housing practice with a discriminatory effect violates the Fair Housing Act
- The standard would be the same under both the ECOA and the Fair Housing Act
- Burden Shifting:
 - Plaintiff must make a *prima facie* showing of disparate impact
 - Burden of proof then shifts to the lender to justify its actions
 - Plaintiff then has the burden of proving a less discriminatory alternative

Fair Lending Compliance

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Fair Lending Examination Overview

ECOA

- **ECOA prohibits discrimination based on:**
 - Race or Color
 - Religion
 - National Origin
 - Sex / Gender
 - Marital Status
 - Age (provided the applicant has the capacity to contract)
 - The applicant's receipt of income derived from any public assistance program
 - The applicant's exercise, in good faith, of any rights under the Consumer Credit Protection Act

Fair Lending Examination Overview

(continued)

FHA

- **FHA prohibits discrimination based on:**
 - Race or Color
 - Religion
 - National Origin
 - Sex / Gender
 - Marital status
 - Familial Status (defined as children under the age of 18 living with a parent or legal custodian, pregnant women, and people securing custody of children under 18)
 - Handicap

What Can Credit Unions Do to Mitigate Fair Lending Risks?

- Develop written fair lending policies and procedures
- Perform risk assessments
- Ongoing monitoring of compliance

HMDA

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HMDA

All Credit Unions with more than \$42 million in assets as of December 31, 2012 must file HMDA data if they had an office in a MSA and originated at least 1 purchase mortgage or refinance during 2012.

Determine Whether the Credit Union is Required to Submit HMDA Data

- Establish policies and procedures
- Ensure personnel responsible for maintaining the data are properly trained
- Establish a verification system
- FIELD OF MEMBERSHIP LIMITATIONS CAUSE MOST CREDIT UNIONS TO PRODUCE HMDA STATISTICS THAT WOULD DEFINE THEM AS STATISTIC OUTLIERS

NCUA Targets for Fair Lending Examinations

- HMDA Outliers
- Fair Lending Examinations
- CAMEL Rating
- Volume, Types or Complexity of lending products and services
- Types of Communities served within FOM
- Prior Lending Discrimination Complaints

Off-Site Supervision Contacts

- Review of policies and procedures
- Audit and verify assessments and compliance
- Evaluate the accuracy of loan application registry
- 2009 FFIEC Interagency Fair Lending Examination Procedures

Prohibited Practices

It is a violation of fair lending laws to express, orally or in writing, a preference based on prohibited factors or to indicate that the lender will treat applicant differently on a prohibited basis even if the lender treats applicants equally.

Prohibited Practices *(continued)*

The FHA prohibits discrimination on the basis of handicap and requires lenders to make reasonable accommodations for a person with disabilities when such accommodations are necessary to afford the person an equal opportunity to apply for credit.

Prohibited Practices *(continued)*

Under ECOA and/or FHA, a lender may not, because of a prohibited factor:

- Fail to provide information or services or provide different information or services regarding any aspect of the lending process, including credit availability, application procedures, or lending standards
- Discourage or selectively encourage applicants with respect to inquiries about or applications for credit
- Refuse to extend credit or use different standards in determining whether to extend credit

Prohibited Practices *(continued)*

Under ECOA and/or FHA, a lender may not, because of a prohibited factor:

- Vary the terms of credit offered, including the amount, interest rate, duration, or type of loan
- Use different standards to evaluate collateral
- Treat a borrower differently in servicing a loan or invoking default remedies
- Use different standards for pooling or packaging a loan in the secondary market

Prohibited Practices *(continued)*

A lender may not discriminate on a prohibited basis because of the characteristic of:

- An applicant, prospective applicant, or borrower
- A person associated with an applicant, prospective applicant, or borrower (for example, a co-applicant, spouse, business partner, or live-in aide)
- The present or prospective residents of the property to be financed
- The neighborhood or other area where property to be financed is located (e.g., on the basis of the area's racial or ethnic composition - known as "redlining")

TARGETED

Prohibited Practices *(continued)*

Some fair lending concerns that may result in additional regulatory review or enforcement actions include:

- Disparities in the pricing of credit, including fees or rates, based on a prohibited factor and where price differences are not related to pricing factors described in credit union policy and procedures
- Disparities in loan product selection or underwriting, where there is discretion by loan officers, including where policy is unclear or where exceptions are allowed
- Marketing and lending practices that exclude geographic areas based on the racial or ethnic composition of those areas (*redlining*)

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Periodic Fair Lending Risk Assessments

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Fair Lending Program Based on the Results of Risk Assessments

Triggers:

- Lack of specific guidelines for pricing
- Use of risk-based pricing that is not based on an objective criteria
- Broad pricing discretion
- Lack of clear documentation
- Lack of monitoring for pricing disparities
- Financial incentives for loan originators that charge higher prices
- Pricing policies or practices that treat applicants of a protected class differently
- Loan programs offered to borrowers of a particular protected class
- Complaints about pricing

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Best Practices in Fair Lending Compliance

Self Testing

- Self-Testing and corrective actions do not expunge or extinguish legal liability for violations of the law. BUT, self-testing and comprehensive corrective action will be considered a substantial mitigating factor by regulatory agencies, HUD and DOJ when contemplating possible enforcement actions.

The most common types of self-testing are:

- Use of mystery shoppers to identify pre-application discrimination
- Surveys of loan applicants after lending decision
- Compliance Officers' participation
- Outside Audit

Best Practices in Fair Lending Compliance

(continued)

Self Testing

- Under ECOA, a self-evaluation is different from a self-test. A self-test is defined as “any program, practice, or study designed and used specifically to determine the extent or effectiveness of a creditor’s compliance with the act or Regulation B; and creates information that is not available and cannot be derived from files/records related to credit transactions.”
- The report or results of the self-test (NOT self-evaluation) that a lender voluntarily conducts are privileged, but the privilege applies only if appropriate corrective action is being or has been taken.

Lawsuits and Settlements

Discretionary Pricing

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Prohibited Practices

Fair Lending Overview

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DOJ Sued SunTrust Mortgage

Allegations – violations of ECOA and FHA for maintaining policies and practices, including compensation systems, which caused 20,000 African-American and Hispanic borrowers to pay higher loan fees and costs.

- Higher fees allegedly were not based on borrower's creditworthiness or objective criteria related to borrower risk
- Retail mortgage loan officers were compensated accordingly to net overages
- Loan officers were able to extract above-base rates

SunTrust Mortgage Settlement

In order to avoid the risks, expense and burdens of litigation, SunTrust entered into a consent order and agreed to:

- Maintain policies and procedures designed to ensure the price charged for residential loan products is set in a non-discriminatory manner consistent with ECOA and FHA
- Compensate affected African-American and Hispanic borrowers through the administration of a \$21,000,000 settlement fund

SunTrust Mortgage Policy Changes

- Prohibited overages in its retail loans that exceeded 100 basis points
- Required employees to document reason for any rate change
- Required documentation of compliance with fair lending standards
- Required an appropriate manager under the supervision of a designated senior official to review compliance with new practices
- Instituted a monitoring program including a review of overages, subsidies and total brokerage compensation
- Maintained a complaint resolution program to address consumer complaints alleging discrimination
- Provided equal opportunity training to management officials and employees to participate in taking loan applications
- Deposited \$21,000,000 into a settlement fund to compensate borrowers impacted by SunTrust discrimination
- Submitted semi-annual reports to the Department of Justice

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DOJ Settled with the Following after Settling/Consent Orders for SunTrust

Wells Fargo
Texas Champion Bank
C&F Mortgage
First United Security Bank
GFI Mortgage Bankers
First Lowndes Bank
Nara Bank
Nixon State Bank
Pacifico Ford
PrimeLending
Springfield Ford

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Discriminatory Brokers' Fees

- DOJ sued AIG alleging it allowed mortgage brokers to charge total brokerage fees 20 basis points higher, on average, to black borrowers than those fees charged to white borrowers
- Allegations – violations of FHA and ECOA through its policy and practice of allowing brokers unsupervised and subjective discretion to set the amount of their direct fees

AIG Agreed:

- Maintain annual fair-lending training appropriate to the nature of its lending activities and requirements of ECOA and FHA
- Develop and implement specific, non-racial standards for the assessment of direct brokers' fees including written documentation of such fees in every loan file
- Post and prominently display a Notice of Non-discrimination in each location where loan applications are received
- Require brokers to make full disclosure to applicants that includes the full amount of direct broker fees and any other form of broker compensation
- Develop and implement direct broker-fee monitoring programs including a quarterly review by senior managers documented and presented to the Board of Directors for review

AIG Agreed:

- Contribute \$1,000,000 to a qualified organization to provide credit counseling, financial literacy and other related educational programs targeted at African-American borrowers
- Provide training with respect to AIG's obligations under ECOA and FHA for all management officials, loan officers and all other employees who participated in the pricing of wholesale mortgage related loans
- Deposit \$6,100,000 in settlement account to pay damages to affected borrowers
- Maintain a complaint resolution program to address complaints regarding mortgage loans

Minimum Loan Amounts

DOJ sued Luther Burbank Savings

- Allegations -- violations of ECOA and FHA when it enforced the \$400,000 minimum loan amount policy for its wholesale single-family residential mortgage loan programs causing a relatively small number of mortgage loans to be made to African-American and Hispanic borrowers
- DOJ alleged that they found evidence that Luther Burbank Savings acknowledged its low levels of lending to these minority groups but continued the minimum loan amount policy that created the disparity, even after its regulator identified the policy as the primary contributing factor

Consent Order

In order to avoid the cost, risk and burdensome litigation, Luther consented and agreed to the following:

- Refrain from implementing a minimum loan policy similar to the prior \$400,000 policy
- Provide notice to the Department of Justice of any proposed changes that would increase the minimum loan amount
- Provide periodic fair lending training to all bank employees who may have significant involvement in a single-family residential lending
- Offer all mortgage brokers who deal with the Bank the opportunity to participate in its fair lending training program
- Employ at least one community development leader
- Participate in partnerships with one or more community-based organizations that provide financial and credit services to minorities

Consent Order *(continued)*

In order to avoid the cost, risk and burdensome litigation, Luther consented and agreed to the following:

- Spend at least \$450,000 on the partnerships that are created one or more community-based organizations
- Develop marketing, advertising and outreach programs to increase lending presence among borrowers and minority census track spending at least \$300,000
- Conduct at least 4 outreach programs each year for brokers and agents
- Invest \$150,000 in credit counseling, financial literacy and other related educational programs
- Contribute at least \$1,100,000 in special financing programs for borrowers within the areas affected by the bank's prior violations of ECOA and FHA
 - Offering interest rates below what Luther would normally charge
 - Down payment or closing costs, grants or assistance
 - Other financial aid

Steering

- DOJ Sued Wells Fargo alleging that Wells Fargo placed African-American applicants in subprime mortgages more often than similarly situated white applicants from 2004-2008 even where African-American borrowers qualified for prime loan products -- a practice known as “steering”
- It was alleged between 2004 and 2008 prime qualified African-American borrower were more than four times as likely to be “steered” into subprime mortgages than white borrowers

Consent Order

In order to avoid the risks, expenses and burdens of litigation, Wells Fargo entered into a consent order as follows:

- Prohibit originators from receiving compensation based on any of the terms or conditions of the loan if it varies from the par rate
- Limit total brokerage compensation to 3.25% of the loan amount
- The amount per loan is to be determined on a quarterly basis and cannot vary by loan product
- Maintain a complaint resolution program to address alleged discrimination regarding pricing or product placement

Consent Order *(continued)*

- Maintain a fair lending auditing and monitoring program including semi-annual review by senior managers and presentations to the board of directors for review
- Prominently display a notice of non-discrimination in each location that accepts loan applications
- Provide comprehensive fair lending training to management, employees and mortgage brokers
- Deposit \$125,000,000 to an escrow account to compensate borrowers affected by the ECOA and FHA violations and enter into a contract with a settlement administrator to monitor the disbursements of the settlement fund

Consent Order *(continued)*

- Institute a new home buyer assistance program with at least \$50,000,000 in funding to be spent directly on down payment assistance, closing costs and other home renovation financing
- Adopt an agreed upon statistical model and process in order to determine whether qualified African-Americans and/or Hispanic borrowers who received subprime loans might have qualified for prime loans and provide cash rebates to such impacted borrowers
- Send semi-annual reports of progress and compliance to the Department of Justice

Redlining

- DOJ sued Citizens Bank for alleged violations of ECOA and FHA when it engaged in “redlining”
- The term redlining derives from the discriminatory practice in which loan officers would mark integrated minority census tracts on residential maps in red, indicating that they represent poor risks
- Citizens Bank allegedly expanded its operations, including the acquisition of Republic Bank and opening new branch offices, but limited its expansion to minority-white census tracts

Redlining

Citizens Bank entered into a consent order in which it agreed to the following:

- Refrain from engaging in any act or practice that discriminates on the basis of race in residential real estate transactions
- Include Wane County and the City of Detroit in its assessment areas
- Provide periodic training to all employees on fair lending practices consistent with ECOA and FHA
- Form a partnership with the City of Detroit to promote sustained homeownership in majority-black communities, including a \$1,625,000 grant to provide existing homeowners in targeted neighborhoods up to \$5,000 for exterior improvements

Redlining *(continued)*

Citizens Bank entered into a consent order in which it agreed to the following:

- Take into account the City of Detroit's credit needs assessment in deciding how best to provide residential mortgage lending to majority black areas in Wane County
- Employ two community development leaders to focus on mortgage loan generation and grant distribution in majority-black census tracts

Redlining *(continued)*

- Open a loan production office in a majority-black area of the City of Detroit to focus on marketing and intake of mortgage loan applications
- Continue to evaluate the feasibility of branch expansion in majority black areas of Wane County
- Enhance advertising and marketing efforts in Wane County, including:
 - print, radio and point of distribution materials
 - direct marketing
 - at least four outreach programs per year for residential real estate professionals doing business in majority-black areas

Redlining *(continued)*

- Provide at least 6 outreach seminars to residents of majority black areas per year, including credit counseling, financial literacy and other related educational programs
- Invest at least \$1,500,000 for a loan subsidy program to residents in majority black census tracts, including providing terms that are more advantageous than normally provided such as: interest rate subsidies, down payment assistance or closing assistance

Discriminatory Documentation Requests

- DOJ filed a lawsuit against Bank of America for alleged violations of ECOA and FHA in connection with its policy of requiring borrowers who are recipients of social security disability income to produce additional documentation of their disability in the form of a letter from their physicians
- HUD discovered this policy after it received only 3 separate complaints from applicants about the bank's requests
- Non-disabled applicants are not required to submit documentation of the duration or permanence of their income

Discriminatory Documentation Requests

In order to avoid the cost of litigation, Bank of America entered into a consent order which provided as follows:

- Refrain from discriminating against any mortgage loan applicant who receives disability income by asking for a letter from a doctor to document or substantiate their disability income
- Take steps to destroy all medical information contained in its files with regard to the HUD complaints
- Implement a monitoring program to ensure compliance with disability income policies
- Take prompt corrective action, including compensation to victims and retraining of employees who it finds disabled individuals' rights have been violated

Discriminatory Documentation Requests

(continued)

In order to avoid costly litigation, Bank of America entered into a consent order which provided as follows:

- Inform applicable employees of the disability income policies and the terms of the consent order, including documentation of employees' acknowledgement and understanding of such education
- Update fair lending training to include current disability income policies
- Maintain a complaint resolution program to address discrimination complaints concerning verification of disability
- Enter into a contract with a settlement administrator for a minimum of \$370,000,000 in relief
- Notify aggrieved individuals and compensate them between \$1,000 and \$50,000 depending on the degree of harm caused by Bank of America's violations

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Discrimination Based on Marital Status

DOJ filed a lawsuit against Compass Bank for alleged violations of ECOA when the bank promulgated a policy of discriminating against co-applicants for automobile loans based on their non-spousal relationship

- DOJ alleged that Compass Bank issued rate sheets to over 400 participating automobile dealerships directing them to either quote interest rates 1% to 2% higher than base rates for unmarried co-applicants or to deny them the right to apply altogether

Discrimination Based on Marital Status

In order to avoid costly litigation, DOJ and Compass Bank entered into a settlement/consent order in which it was agreed to as follows:

- Ensure that the buy rates for automobile loans are made available on no less favorable terms to unmarried co-applicants than married co-applicants
- Continue to distribute new rate sheets that provide equal terms to unmarried co-applicants as married applicants to participating automobile dealerships
- Distribute the amended credit policy to all employees involved in setting rates for indirect automobile loans
- Provide annual equal opportunity training to employees and officers who are involved in the setting of rates and secure a signed statement of acknowledgement and receipt of the consent order by such employees and officers as well as their completion of training

Best Practices for Complying with Fair Lending Laws

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Best Practices

Commitment from Board and Senior Management

1. To maintain an effective fair lending compliance management system
2. To allocate the appropriate amount of resources to ensure that compliance function can mitigate fair lending risks
3. Learn from those that have been sued by DOJ

Best Practices

Know Your Data

Credit Unions should carefully review their data and assessment area information for any potential fair lending concerns (such as prohibited basis disparities in pricing and underwriting, irregular assessment areas, etc.)

Best Practices

Know Your Products

Credit Unions should incorporate a compliance review of all proposed products and services early in the development cycle, before the product is offered to members, to proactively address potential fair lending risks

Best Practices

Self-Tests and Self-Evaluations

Self-tests and self evaluations can serve as important components of an institution's fair lending compliance management program

1. A self-test is any program, practice or study that is designed and specifically used to determine the extent or effectiveness of the institution's compliance with the ECOA and the FHA. It creates data or factual information that is not otherwise available and cannot be derived from loan, application or other records related to credit transactions.
2. A self-evaluation, while generally having the same purpose as a self-test, does not create any new data or factual information, but uses data readily available in loan or application files or other records used in credit transactions.
3. The report or results of the self-test (NOT self-evaluation) that a lender voluntarily conducts are privileged, but the privilege applies only if appropriate corrective action is being or has been taken.

Best Practices

Fair Lending Risk Assessments

- Risk assessments allow a credit union to develop an effective fair lending compliance management program to mitigate fair lending risks

Best Practices

Avoid Discouraging Applicants

Credit Unions should carefully review their lending process to avoid discouraging applicants

- Refrain from making potentially discriminatory comments or stating personal opinions about the location of a home
- Avoid requiring prospective applicants to provide their social security number and/or have their credit report pulled before providing basic loan product information
- Avoid inconsistency in referrals

Best Practices

Avoid Potential Steering

If a credit union has multiple lending options available to members they should advise the potential applicants of all options and explain the advantages and disadvantages of each

Best Practices

Fair Lending Training

- A formal fair lending training program, tailored to the credit union, should be implemented to remind employees about the requirements of fair lending laws, and to reinforce policies and procedures
- The training should address all aspects of the application process
- Prominent displaying of signage

NCUA's Recommendations for Best Practices

- Develop written fair lending policies and procedures
- Conduct periodic fair lending risk assessments
- Develop a fair lending compliance program

Best Practices

Paper Documentation for Fair Lending Policies and Procedures

- Credit Unions need a clear set of policies and procedures that include a thorough documentation of all activities

Lending

- The formal policies and procedures must commence with the pre-application process, as well as the application process

Best Practices

Second Review Process

Credit Unions should consider implementing a second review process to ensure that all credit decisions receive a “second look” and to monitor whether the decisions are consistent with its policies and procedures and not made on a prohibited basis. This review process should carefully monitor any exceptions and decisions where discretion is allowed.

Summary Targets and Key Takeaways

- Learn from the Litigation
- Documentation/Policies and Procedures
- Conduct your own Fair Lending Exam using the NCUA Examination Documentation
- Second Review
- Monitor All Resources to Stay Current
- K&C Link to All Documentation
http://www.kaufmanandcanoles.com/news/articles/fair_lending_examination_documents.htm



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