UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SHATONYA HARRIS, M and KEVIN NICHOLSON themselves and all others s	l, on behalf of)))	
	Plaintiffs,)	Civil Action No. 08-10417-MLW
v.)	CIVIL ACTION TAGE OF TO THE TAGES W
CITIGROUP INC., and CITIMORTGAGE, INC.,)	
	Defendants.)	

DECLARATION OF JOHN MARCH

- I, John March, hereby depose and state the following, under the pains and penalties of perjury:
- 1. I am a Director of CitiMortgage, Inc ("CitiMortgage"). This declaration is based on my personal knowledge and information available to me from certain records and personnel from CitiMortgage and Citigroup, Inc. ("Citigroup").
- 2. I make this declaration in connection with certain settlement discussions regarding the claims made by Shatonya Harris, Mateo Huerta and Kevin Nicholson against CitiMortgage and Citigroup in the above-referenced litigation between counsel for Mr. Puello and counsel for CitiFinancial.
- 3. The information contained in this declaration is intended for settlement purposes only, and is inadmissible in the above-referenced litigation pursuant to Federal Rule of Evidence 408.

- 4. On April 15, 2011, I caused to be collected certain information regarding the volume of loans originated by CitiMortgage and its operating subsidiaries in the retail and wholesale division from January 1, 2004 through December 31, 2010.
- 5. In order to obtain this information, CitiMortgage employees, at my direction, took the following steps:
- a. Accessed a secure drive in St. Louis that only the Data Program Manager for Fair Lending has access to, which contains information delivered each year from the HMDA and CRA Unit via the HMDA Unit Share Point site; and
- b. Ran a query was in Microsoft Access against the final reportable HMDA data for each year, filtering for Legal Vehicle, Channel, Race and Ethnicity, to determine the number of African-American and Hispanic borrowers who obtained mortgage loans from CitiMortgage, either through the retail or wholesale lending divisions, from January 1, 2004 through December 31, 2010, based on upon CitiMortgage's HMDA data.
- 6. Based on the procedure described in Paragraph 5 above, CitiMortgage and its operating subsidiaries originated 54,294 loans through its retail lending division from January 1, 2004 through December 31, 2010.
- 7. Based on the procedure described in Paragraph 5 above, CitiMortgage and its operating subsidiaries originated 49,044 loans through its wholesale lending division from January 1, 2004 through December 31, 2010.
- 8. Based on the procedure described in Paragraph 5 above, CitiMortgage and its operating subsidiaries originated 103,338 loans through its retail and wholesale lending divisions combined from January 1, 2004 through December 31, 2010.

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9. Based on the procedure described in Paragraph 5 above, CitiMortgage and its operating subsidiaries originated 19,528 loans through its wholesale lending division from January 1, 2004 through December 31, 2006.

I declare under penalty of perjury that the foregoing is true and correct.

This the 23rd day of June, 2011.

John March