PUBLIC DISCLOSURE

October 20, 2016

MORTGAGE LENDER COMMUNITY INVESTMENT PERFORMANCE EVALUATION

CRESCENT MORTGAGE COMPANY

ML4247

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600 EMBASSY ROW, SUITE 650
ATLANTA GA. 30328

DIVISION OF BANKS
1000 WASHINGTON STREET
BOSTON MA. 02118

NOTE:	This evaluation is not, nor should it be construed as, an assessment of the financial condition of this mortgage lender. The rating assigned to this mortgage lender does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this mortgage lender.

GENERAL INFORMATION

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' (Division) regulation 209 CMR 54.00, Mortgage Lender Community Investment (CRA), require the Division to use its authority when examining mortgage lenders subject to its supervision who have made 50 or more home mortgage loans in the last calendar year, to assess the mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth, including low- and moderate-income neighborhoods and individuals, consistent with the safe and sound operation of the mortgage lender. Upon conclusion of such examination, the Division must prepare a written evaluation of the mortgage lender's record of meeting the credit needs of the Commonwealth.

This document is an evaluation of the CRA performance of **Crescent Mortgage Company (the Lender or Crescent)** prepared by the Division, the Lender's supervisory agency, as of **October 20, 2016**.

SCOPE OF EXAMINATION

An onsite evaluation was conducted using examination procedures, as defined by CRA guidelines. A review of the Division's records, as well as the mortgage lender's public CRA file, did not reveal any complaints.

The CRA examination included a comprehensive review and analysis, as applicable, of Crescent's:

(a) origination of loans and other efforts to assist low and moderate income residents, without distinction, to be able to acquire or to remain in affordable housing at rates and terms that are reasonable considering the mortgage lender's history with similarly situated borrowers, the availability of mortgage loan products suitable for such borrowers, and consistency with safe and sound business practices;
(b) origination of loans that show an undue concentration and a systematic pattern of lending resulting in the loss of affordable housing units;
(c) efforts working with delinquent residential mortgage customers to facilitate a resolution of the delinquency; and
(d) other efforts, including public notice of the scheduling of examinations and the right of interested parties to submit written comments relative to any such examination to the Commissioner, as, in the judgment of the Commissioner, reasonably bear upon the extent to which a mortgage lender is complying with the requirements of fair lending laws and helping to meet the mortgage loan credit needs of communities in the Commonwealth.

CRA examination procedures were used to evaluate Crescent's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Crescent's lending and community development activities for the period of January 2014 through December 2015. The data and applicable timeframes for the Lending Test and the Service Test are discussed below.

The Lending Test evaluates the mortgage lender's community investment performance pursuant to the following five criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, fair lending, and loss of affordable housing.

Home mortgage lending for 2014 and 2015 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. Comparative analysis of the Lender's lending performance for the year of 2015 is provided because it is the most recent year for which aggregate HMDA lending data is available. The aggregate lending data is used for comparison purposes within the evaluation and is a measure of loan demand. It includes lending information from all HMDA reporting mortgage lenders which originated loans in the Commonwealth of Massachusetts. Home mortgage lending data for first six months of 2016 is referenced in the narrative to illustrate trends in Crescent's lending data.

In addition to gathering and evaluating statistical information relative to a mortgage lender's loan volume, the CRA examination also reflects an in depth review of the entity's mortgage lending using qualitative analysis, which includes, but is not limited to: an assessment of the suitability and sustainability of the mortgage lender's loan products by reviewing the lender's internally maintained records of delinquencies and defaults as well as information publicly available through the Federal Reserve Banks and through local Registries of Deeds and through other sources available to the examination team. The examination included inspection of individual loan files for review of compliance with consumer protection provisions and scrutiny of these files for the occurrence of disparate treatment based on a prohibited basis.

The Service Test evaluates the mortgage lender's record of helping to meet the mortgage credit needs by analyzing the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products, the extent and innovativeness of its community development services, and, if applicable, loss mitigation services to modify loans and/or efforts to keep delinquent home borrowers in their homes.

MORTGAGE LENDER'S CRA RATING:

This mortgage lender is rated "Satisfactory".

- The geographic distribution of the Lender's loans reflects adequate dispersion in low- and moderate-income level census tracts, as it is reflective of the distribution of owner occupied housing in those census tracts.

- Given the demographics of Massachusetts, the loan distribution to borrowers reflects, an adequate record of serving the credit needs among individuals of different income levels.

- Crescent offers flexible lending products, which are provided in a safe and sound manner to address the credit needs of low and moderate-income level individuals.

- Fair lending policies and practices are considered adequate.

- The Lender provides an effective delivery of mortgage lending and a reasonable level of Community Development Services within the Commonwealth.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Crescent was established in the State of Delaware in 2003, and was granted a license by the Division in January 2004. Crescent's main office is located at 600 Embassy Road in Atlanta, Georgia. The Lender is licensed to do business throughout the United States, and has no branch offices located within Massachusetts.

Crescent offers mortgage loan products which meet the needs of the Commonwealth's borrowers. Crescent is an approved lender for the Federal Housing Administration, Veterans Administration, and US Department of Agriculture.

All underwriting and major functions in the loan process are done at Crescent's main office, as well as several other authorized regional locations. Approved loans are funded from a line of credit established through parent company CresCom Bank. Crescent's business model relies entirely on third party loan originations. Originated loans are closed in Lender's name and sold immediately to secondary market investors, with servicing rights equally retained and released.

Demographic Information

The regulation requires mortgage lenders to be evaluated on their performance within the Commonwealth of Massachusetts. Demographic data is provided below to offer contextual overviews of economic climate along with housing and population characteristics for the Commonwealth of Massachusetts.

2010 CENSUS DEMOGRAPHIC INFORMATION						
Demographic Characteristics	***Amount***	***Low %***	***Moderate %***	***Middle %***	***Upper %***	***N/A %***
Geographies (Census Tracts)	*1,474*	*10.8*	*20.0*	*40.7*	*27.1*	*1.4*
Population by Geography	*6,547,629*	*8.9*	*18.9*	*42.8*	*29.2*	*0.2*
Owner-Occupied Housing by Geography	*1,608,474*	*2.9*	*13.7*	*48.9*	*34.5*	*0.0*
Family Distribution by Income Level	*1,600,588*	*19.2*	*17.8*	*24.4*	*38.6*	*0.0*
Distribution of Low and Moderate Income Families Throughout AA Geographies	*592,420*	*7.7*	*18.4*	*43.6*	*30.3*	*0.0*
Median Family Income	*$86,272*		***Median Housing Value***		*373,206*	
Households Below Poverty Level	*11.1%*		***Unemployment Rate***		*3.6**	
2014 HUD Adjusted Median Family Income	*$83,700*		***2015 HUD Adjusted Median Family Income***		*$87,300*	

*Source: 2010 US Census; *as of 09/30/2016*

Based on the 2010 Census, the Commonwealth's population stood at 6.55 million people with a total of 2.79 million housing units. Of the total housing units, 1.61 million or 57.7 percent are owner-occupied, 904,078 or 32.5 percent are rental-occupied, and 9.8 percent are vacant units.

According to the 2010 Census there are 2.51 million households in the Commonwealth with a median household income of $69,101. Nearly 40 percent of the households are now classified as low and moderate-income. In addition, over 11 percent of the total number of households are living below the poverty level. Individuals in these categories may find it challenging to qualify for traditional mortgage loan products.

Households classified as “families” totaled slightly over 1.60 million. Of all family households, 19.2 percent were low-income, 17.8 percent were moderate-income, 24.4 percent were middle-income, and 38.6 percent were upper-income. The median family income according to the 2010 census was $86,272. The Housing and Urban Development (HUD) adjusted median family income is $87,300 in 2015. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contained 1,474 Census tracts. Of these, 160 or 10.8 percent are low-income; 295 or 20.0 percent are moderate-income; 600 or 40.7 percent are middle-income; 399 or 27.1 percent are upper-income; and 20 or 1.4 percent are NA or have no income designation. The tracts with no income designation are located in areas that contain no housing units and will not be included in this evaluation since they provide no lending opportunities. These areas are made up of correctional facilities, universities, military installations, and uninhabited locations such as the Boston Harbor Islands.

Low-income is defined as individual income that is less than 50 percent of the area median income. Moderate-income is defined as individual income that is at least 50 percent and less than 80 percent of the area median income. Middle-income is defined as individual income that is at least 80 percent and less than 120 percent of the area median income. Upper-income is defined as individual income that is more than 120 percent of the area median income.

The median housing value for Massachusetts was $373,206 according to the 2010 Census. The unemployment rate for the Commonwealth of Massachusetts stood at 3.6 percent as of September 2016, which was a decrease from June 2016 when the unemployment rate was at 4.2 percent. Employment rates would tend to affect a borrower’s ability to remain current on mortgage loan obligations and also correlates to delinquency and default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The lending test evaluates a mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth through its lending activities. Crescent's lending efforts are rated under the six performance criteria: Geographic Distribution, Borrower Characteristics, Innovative or Flexible Lending Practices, Loss Mitigation Efforts, Fair Lending Policies and Procedures, and Loss of Affordable Housing. The following information details the data compiled and reviewed, as well as conclusions on the mortgage lending of Crescent.

Crescent's Lending Test performance was determined to be "Satisfactory" at this time.

I. Geographic Distribution

The geographic distribution of loans was reviewed to assess how well Crescent is addressing the credit needs throughout the Commonwealth of Massachusetts' low, moderate, middle, and upper-income Census tracts.

The following table presents, by number, Crescent's 2014 and 2015 HMDA reportable loans in low, moderate, middle, and upper-income geographies, in comparison to the percentage of owner-occupied housing units in each of the Census tract income categories, and the 2015 aggregate lending data (exclusive of Crescent).

Distribution of HMDA Loans by Income Level Category of the Census Tract						
Census Tract Income Level	***Total Owner-Occupied Housing Units***	***2014 Crescent***		***2015 Aggregate Lending Data***	***2015 Crescent***	
	%	***#***	***%***	***% of #***	***#***	***%***
Low	*3.1*	*7*	*3.7*	*3.6*	*10*	*4.3*
Moderate	*13.0*	*39*	*20.3*	*12.9*	*33*	*14.0*
Middle	*48.3*	*108*	*56.2*	*46.5*	*122*	*51.9*
Upper	*35.6*	*38*	*19.8*	*37.0*	*70*	*29.8*
Total	***100.0***	***192***	***100.0***	***100.0***	***235***	***100.0***

Source: 2014 & 2015 HMDA LAR Data and 2010 U.S. Census Data.

As reflected in the above table, of the total 192 loans originated in 2014, 24.0 percent were in the low and moderate-income level geographies. The percentages in both categories exceeded the percentage of the area's owner occupied housing units in low and moderate-income level geographies, as well as the aggregate lending data percentages.

In 2015, the percentage of lending in low-income census tracts had increased, while the percentage for moderate-income census tracts fell to levels comparable with the census and aggregate data.

The highest concentration of residential loans was originated in the middle-income census tracts for both 2014 and 2015. Given that over 80.0 percent of the area's owner-occupied housing units are in middle and upper-income census tracts, it is reasonable to find the majority of loans originated within these designated census tracts.

Overall, the geographic distribution of residential mortgage loans reflects a satisfactory dispersion throughout low and moderate-income census tracts within the Commonwealth. Preliminary review of the interim 2016 data indicates that at 18.7 percent, lending in low and moderate-income geographies continues at the 2015 levels.

II. Borrower Characteristics

The distribution of loans by borrower income levels was reviewed to determine the extent to which the Lender is addressing the credit needs of the Commonwealth's residents.

The following table shows Crescent's 2014 and 2015 HMDA-reportable loans to low, moderate, middle, and upper-income borrowers in comparison to the percentage of total families within the Commonwealth in each respective income group, and the 2015 aggregate peer lending data (exclusive of Crescent).

Distribution of HMDA Loans by Borrower Income Level						
Median Family Income Level	***% of Families***	***2014 Crescent***		***2015 Aggregate Lending Data***	***2015 Crescent***	
	%	***#***	***%***	***% of #***	***#***	***%***
Low	*22.2*	*10*	*5.2*	*4.8*	*20*	*8.5*
Moderate	*16.5*	*51*	*26.6*	*15.8*	*64*	*27.2*
Middle	*20.6*	*68*	*35.4*	*21.3*	*75*	*31.9*
Upper	*40.7*	*57*	*29.7*	*39.2*	*66*	*28.1*
N/A	*0.0*	*6*	*3.1*	*18.9*	*10*	*4.3*
Total	***100.0***	***192***	***100.0***	***100.0***	***235***	***100.0***

Source: 2014 & 2015 HMDA LAR Data and 2010 U.S. Census Data.

As shown in the above table, at 5.2 percent and 8.5 percent respectively, lending to low-income borrowers during 2014 and 2015 was below the percentage of low-income families, but above the performance of the aggregate data. Crescent's lending to moderate-income borrowers during that same period exceeded the percentage of moderate-income families, as well as the performance of the aggregate data.

The high housing costs throughout Massachusetts can restrict the ability of low-income mortgage loan applicants to qualify for residential loans, which may constraint the opportunities to lend to these consumers.

The Lender's overall lending performance to low and moderate-income borrowers, stands at a satisfactory position. This trend also appears to be supported by a preliminary review of the interim data for 2016 that indicates that 37.2 percent of loans were originated to low and moderate-income individuals.

III. Innovative or Flexible Lending Practices

Crescent offers flexible lending products, which are provided in a safe and sound manner to address the credit needs of low and moderate-income individuals or geographies.

Crescent became a Housing and Urban Development approved Non-Supervised FHA Loan Correspondent (Direct Endorsement Lender) in 2004. FHA products provide competitive interest rates, smaller down payments for low and moderate income first time homebuyers and existing homeowners. During the review period, Crescent originated 194 FHA loans totaling $41 million. Of these, 87 loans or 45 percent benefited low to moderate-income borrowers, while 59 loans or 30 percent were originated in low and moderate-income level geographies.

Crescent became Veterans Administration's Automatic Approval Agent in 2004. The VA Home Loan Guarantee Program is designed specifically for the unique challenges facing service members and their families. Through VA-approved lenders like Crescent, the program offers low closing cost, no down payment requirement, and no private mortgage insurance requirement. In addition, under certain circumstances the Service Members Civil Relief Act provides military personnel with rights and protections on issues relative to mortgage interest rates and foreclosure proceedings. During the review period, Crescent originated 97 VA loans totaling $27 million. Of these, 24 loans or 25 percent benefited low to moderate-income borrowers, while 14 loans were originated in low and moderate-income level geographies.

Since 2007 Crescent also offers loan products guaranteed by the USDA Rural Housing Program is an innovative loan program that provides 100 percent financing for eligible homebuyers in rural-designated areas. This program is for home purchase transactions which offers fixed rates, and does not require a down payment. Income requirements do apply and the property must be located in a rural development designated area. Farm Service Agency loan products provide flexible temporary financing for customers who are planning to start, purchase, sustain or expand a family farm. During the review period, Crescent originated 21 loans totaling $4 million. Of these, seven loans benefited low to moderate-income borrowers, while one loan was originated in low and moderate-income level geography.

IV. Loss Mitigation Efforts

The Division reviews mortgage lender's efforts to work with delinquent home mortgage loan borrowers to facilitate a resolution of the delinquency, including the number of loan modifications, the timeliness or such modifications, and the extent to which such modifications are effective in preventing subsequent defaults or foreclosures

The Lender retains servicing for approximately 50 percent of its loans. The remaining loans are sold to secondary market investors with servicing rights released.

Crescent uses a third party to sub-service its retained servicing portfolio. The reviews of the portfolio delinquency report and investor score cards revealed overall default rates at around one percent. These levels do not exceed acceptable industry standards.

Nonetheless, general trend of higher delinquency rates for government secured loans than for conventional loan products is noted.

V. Fair Lending

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-106. The mortgage lender's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. The review included, but was not limited to, a review of written policies and procedures, interviews with Crescent's personnel, and individual file review. No evidence of disparate treatment was identified.

Crescent has established an adequate record relative to fair lending policies and practices.

Fair lending is incorporated in Crescent's company-wide policies and procedures that apply to all employees. All training, including Fair Lending, is administered by the parent company CresCom Bank, utilizing primarily the on-line training modules developed by the American Bankers Association. In addition, employees attend monthly training sessions conducted internally, or in cooperation with other industry entities, and are instructed not to engage in any inappropriate conduct, take any action based upon prohibited basis, or steer consumers to loan products unsuitable for their needs.

Senior management is responsible for ensuring that the Lender is in compliance with current laws and regulations, and for making necessary changes and updates to policies and procedures. Additionally, the Lender has recently initiated an effort to provide its third party origination businesses with education that strengthens their Fair Lending initiatives, policies, and practices through a comprehensive Fair Lending webinar offered at no cost.

Minority Application Flow

Examiners reviewed Lender's HMDA data to determine whether the mortgage application flow from various racial and ethnic groups was consistent with the area demographics.

During 2014 and 2015 Crescent had received 533 HMDA-reportable mortgage loan applications from within the Commonwealth. The racial and ethnic identity was not specified in approximately five percent of cases. Of the remaining applications, 33 or 6.2 percent were received from racial minority applicants, and 27 or 81.8 percent resulted in originations. For the period, Crescent received 46 or 8.6 percent of HMDA reportable applications from ethnic groups of Hispanic or Latino origin, and 35 or 76.1 percent were originated. This compares to 80.1 percent overall ratio of mortgage loans originated by the Lender in Massachusetts, and the 72.7 percent approval ratio for the aggregate.

Demographic information for Massachusetts reveals the total ethnic and racial minority population stood at 23.9 percent of the total population as of the 2010 Census. This segment of the population is comprised of 9.6 percent Hispanic or Latino ethnicities. At 14.3 percent, racial minorities consisted of 6.00 percent Black; 5.3 percent Asian/Pacific Islander; 0.2 percent American Indian/Alaskan Native; and 2.8 percent self-identified as Other Race.

Refer to the following table for information on the mortgage lenders' minority loan application flow as well as a comparison to aggregate lending data throughout the Commonwealth of Massachusetts. The comparison of this data assists in deriving reasonable expectations for the rate of applications the mortgage lender received from minority applicants.

MINORITY APPLICATION FLOW					
RACE	***2014 Crescent***		***2015 Aggregate Data***	***2015 Crescent***	
	#	***%***	***% of #***	***#***	***%***
American Indian/ Alaska Native	*0*	*0.0*	*0.2*	*0*	*0.0*
Asian	*3*	*1.2*	*4.8*	*2*	*0.7*
Black/ African American	*8*	*3.2*	*3.3*	*14*	*5.0*
Hawaiian/Pacific Islander	*0*	*0.0*	*0.2*	*1*	*0.3*
2 or more Minority	*0*	*0.0*	*0.1*	*0*	*0.0*
Joint Race (White/Minority)	*1*	*0.4*	*1.3*	*4*	*1.4*
Total Minority	***12***	***4.8***	***9.9***	***21***	***7.4***
White	*231*	*92.0*	*67.5*	*253*	*89.7*
Race Not Available	*8*	*3.2*	*22.6*	*8*	*2.9*
Total	***251***	***100.0***	***100.0***	***282***	***100.0***
ETHNICITY					
Hispanic or Latino	*15*	*6.0*	*4.0*	*21*	*7.5*
Joint (Hisp-Lat /Not Hisp-Lat)	*4*	*1.6*	*1.0*	*6*	*2.1*
Total Hispanic or Latino	***19***	***7.6***	***5.0***	***27***	***9.6***
Not Hispanic or Latino	*228*	*90.8*	*72.6*	*251*	*89.0*
Ethnicity Not Available	*4*	*1.6*	*22.4*	*4*	*1.4*
Total	***251***	***100.0***	***100.0***	***282***	***100.0***

Source: PCI Corporation CRA Wiz, Data Source: 2000 U.S. Census Data, 2014 & 2015 HMDA Data

In both 2014 and 2015, Crescent's overall racial minority application flow was lower than the population demographics derived from the census data. The Lender's performance was also below the aggregate figures. Ethnic minority flow was in line with the demographic data, and above the performance of the aggregate. A preliminary review of the interim data for 2016 indicates continuation of these trends, with 5.5 percent of applications coming from racial minorities and 9.4 percent from ethnic minorities.

VI. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Crescent by taking into account delinquency and default rates of the mortgage lender and those of the overall marketplace. Information provided by the Lender was reviewed as were statistics available on delinquency and default rates for mortgage loans. Additionally, individual mortgage loans could be tracked for their status through local

Registries of Deeds and other available sources including public records of foreclosure filings.

An extensive review of information and documentation, from both internal and external sources as partially described above, did not reveal lending practices or products that showed an undue concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units. Furthermore, at just over one percent, overall delinquency rates were found to be consistent with industry averages.

SERVICE TEST

The service test evaluates a mortgage lender's record of helping to meet the mortgage credit needs in the Commonwealth by analyzing both the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products; the extent and innovativeness of its community development services; and loss mitigation services to modify loans or otherwise keep delinquent home loan borrowers in their homes. Community development services must benefit the Commonwealth or a broader regional area that includes the Commonwealth.

Crescent’s Service Test performance was determined to be “Satisfactory” at this time.

Community Development Services

A community development service is a service that:

(a) has as its primary purpose community development; and

(b) is related to the provision of financial services, including technical services

The Commissioner evaluates community development services pursuant to the following criteria:

(a) the extent to which the mortgage lender provides community development services; and

(b) the innovativeness and responsiveness of community development services.

At present, Crescent is not directly involved in any community development services benefiting Massachusetts consumers and geographies. Crescent also employs a Corporate Trainer, who provides education about Crescent’s standards and expectations, to the affiliated third party mortgage loan originator companies.

The Lender’s CEO speaks regularly at various industry functions, including recently at the National Association of Hispanic Real Estate Professionals Conference, and the National Association of Professional Mortgage Women Conference. In addition, two of the Lender’s Senior Management are active members of the National Association of Professional Women.

Management is encouraged to employ a strong focus and a pro-active commitment in community development activities or investments that meet the definition of community development under the CRA regulation. Examples may include, but are not necessarily limited to: financial literacy education initiatives targeted to low and moderate-income individuals, foreclosure prevention counseling, and/or providing technical assistance to community organizations in a leadership capacity.

Mortgage Lending Services

The Commissioner evaluates the availability and effectiveness of a mortgage lender's systems for delivering mortgage lending services to low and moderate-income geographies and individuals.

Through third party loan originators, Crescent provides reasonable delivery of mortgage lender services to geographies and individuals of different income levels in the Commonwealth.

Lending practices and products do not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable. Currently, delinquency levels and Lender’s loss mitigation efforts pose no regulatory concern.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the CRA regulation, requires all mortgage lenders to take the following actions within 30 business days of receipt of the CRA evaluation:

1) Make its most current CRA performance evaluation available to the public.

2) Provide a copy of its current evaluation to the public, upon request. In connection with this, the mortgage lender is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the mortgage lender's evaluation, as prepared by the Division of Banks, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its CRA public file.

The Division of Banks will publish the mortgage lender's Public Disclosure on its website no sooner than 30 days after the issuance of the Public Disclosure.