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RECORDING FRAUD REGISTRY**

September 9, 2014

Abstract: This essay argues for a modest expansion of the Nationwide Mortgage Licensing System and Registry (NMLS) in order to detect and deter more recording fraud. It does so, initially, by explaining why this online registry limits mortgage fraud. The essay later describes how the NMLS could detect or deter other crimes, such as deed fraud and lien fraud. Lastly, it deals with concerns about a Comprehensive Recording Fraud Registry.

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WHY WE NEED A COMPREHENSIVE RECORDING FRAUD REGISTRY

*Randall K. Johnson**

INTRODUCTION



Conventional legal wisdom assumes that public records limit recording fraud.¹ This assumption is accepted by the public and practitioners.² So, if the assumption is correct, why has recording fraud increased over time?³ The U.S. Department of Justice (DOJ) offers a partial explanation.⁴ In a new report, the DOJ explains why its public records cannot fully detect or deter recording fraud.⁵ These difficulties arise from at least three agency-specific issues.⁶ The DOJ's issues include the “underreporting and misclassification of mortgage fraud cases[, the failure] . . . to include the mortgage fraud code [when

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¹ See Audrey G. McFarlane, *The Properties of Instability: Markets, Predation, Racialized Geography, and Property Law*, 2011 WIS. L. REV. 855, 882 (2011) (“It is generally assumed that the problems presented by our woefully old-fashioned land records system have been smoothed out. . . , but that is not quite the case.”).

² See Chad J. Pomeroy, *Ending Surprise Liens On Real Property*, 11 NEV. L.J. 139, 141 (2010) (“Most people, and most attorneys, believe that bona fide purchasers of real property are protected against unknown third parties later claiming superior title or rights.”).

³ See Lisa Parker, *Loophole Helps Criminals File Fraudulent Deeds*, NBCCHICAGO.COM (Nov. 20, 2013), <http://www.nbcchicago.com/news/local/Loophole-Helps-Criminals-File-Fraudulent-Deeds-232444821.html> (“The FBI calls [recording fraud]... the fastest [sic] growing white collar crime in the country.”).

⁴ See U.S. DEP'T OF JUSTICE, OFFICE OF THE INSPECTOR GEN., AUDIT OF THE DEPARTMENT OF JUSTICE'S EFFORTS TO ADDRESS MORTGAGE FRAUD (March 2014).

⁵ *Id.* at i.

⁶ See *id.*

this type of recording fraud is] . . . not the leading charge in a case . . . [and the use of an unreliable method of obtaining statistics].”⁷

To address these issues, the DOJ has undertaken a series of reforms.⁸ For example, the DOJ disclosed its past record-keeping issues.⁹ It also adopted a better approach to obtaining and verifying statistics.¹⁰ Lastly, the DOJ called for more informed federal prosecutorial decisions.¹¹

Unfortunately, the DOJ’s reforms will only partially limit recording fraud.¹² These reforms will not be effective in many cases unless recording fraud implicates federal subject-matter jurisdiction.¹³ Thus, other approaches are needed to detect and deter state crimes.¹⁴

One approach, which the DOJ has used successfully in other contexts,¹⁵ is to access the public records of local government agencies.¹⁶ Local public rec-

⁷ *Id.* at i–ii.

⁸ *See id.* at 29–30.

⁹ *Id.* at 29.

¹⁰ *Id.* at 30.

¹¹ *Id.*

¹² *Cf.* McFarlane, *supra* note 1, at 882 (“A number of recent news stories have shown that some property owners have been subject to a [type of recording fraud] sometimes referred to as ‘deed theft’ [or, alternately, as ‘deed fraud’] whereby [these property owners] either are tricked into signing a document transferring their [unmortgaged] property or a deed to their property has been forged and used to fraudulently transfer ownership.”).

¹³ The DOJ’s reforms primarily focus on mortgage fraud and related crimes. The focus on these federal crimes fails to address some of the fastest growing types of recording fraud, which often fail to implicate federal subject-matter jurisdiction. Deed fraud is one example of recording fraud that may not implicate such jurisdiction, at least in those situations where the victim’s property is not encumbered by a mortgage. Another example is lien fraud in cases where “the person filing the document knows the filing is false, [but nonetheless records a state-level lien].” Sara A. Wiswall, *Remedies for Removing Unlawful Liens or Encumbrances: A Response to “Paper Terrorism,”* 30 MCGEORGE L. REV. 546, 551 (1999).

¹⁴ Alternately, where subject-matter jurisdiction is implicated, the accused could face a host of federal charges. These charges may include: 18 U.S.C. § 371 (1994) (“Conspiracy to Defraud”), 18 U.S.C. § 1001 (2006) (“False Statements”), 18 U.S.C. § 1005 (2002) (“False Entries”), 18 U.S.C. § 1014 (2011) (“False Statements on a Loan or Credit Application”), 18 U.S.C. § 1341 (2008) (“Mail Fraud”), 18 U.S.C. § 1342 (1994) (“Fictitious Name or Address”), 18 U.S.C. § 1343 (2014) (“Wire Fraud”), 18 U.S.C. § 1344 (1989) (“Bank Fraud”), 18 U.S.C. § 1956 (2012) (“Laundering of Monetary Instruments”) and 18 U.S.C. § 1957 (2012) (“Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity”). *Cf.* FED. FINANCIAL INSTITUTIONS EXAMINATION COUNCIL, THE DETECTION AND DETERRENCE OF MORTGAGE FRAUD AGAINST FINANCIAL INSTITUTIONS: A WHITE PAPER app. c (2009) (Criminal Statutes).

¹⁵ A good example of the DOJ’s past success is 28 C.F.R. § 23, which “governs interjurisdictional and multijurisdictional criminal intelligence systems that are operated by or on behalf of state and local law enforcement agencies and that are funded with certain federal funds.” *Frequently Asked Questions, Criminal Intelligence Systems, Operating Policies (28 CFR Part 23)*, INSTITUTE FOR INTERGOVERNMENTAL RESEARCH, http://www.iir.com/28CFR_Program/28CFR_FAQ (last visited Aug. 25, 2014).

ords already limit some recording fraud under the auspices of the Nationwide Mortgage Licensing System and Registry (NMLS).¹⁷ The NMLS is an online registry which has information about mortgage fraud in all fifty states.¹⁸

The NMLS demonstrates that government agencies with better access to information are, on average, more effective in detecting and deterring crimes.¹⁹ For example, DOJ officials have started to use this online registry²⁰ along with other third-party data²¹ to make more informed prosecutorial decisions.²² By doing so, the DOJ has significantly improved its conviction rate.²³

¹⁶ Richard G. Flood et al., *Intergovernmental Cooperation*, Illinois Institute for Continuing Legal Education 8.2 (2012) (“[This approach, which is often referred to as intergovernmental cooperation.]... contemplates that local governments... [will] contract and associate among themselves, as well as with [their parent state], other states, and the federal government [, in order to achieve their shared policy goals].”).

¹⁷ Bryce Gray, VI, *The Secure and Fair Enforcement for Mortgage Licensing Act of 2008*, 31 REV. BANKING & FIN. L. 51, 53 (2011). (“[The Secure and Fair Enforcement for Mortgage Licensing Act of 2008, which authorized the creation of the NMLS,] explicitly declares that [its] purpose . . . is to ‘increase uniformity, reduce regulatory burdens, enhance consumer protection, and reduce fraud.’”).

¹⁸ 2013 STATE REGULATORY REGISTRY LLC ANN. REP. 8, <http://www.csbs.org/srr/Documents/SRR%20AR%202013%20Final%20%28Web%29%20%282%29.pdf> (last visited Aug. 25, 2014) (“In 2013, all states, the District of Columbia, Puerto Rico and the U.S. Virgin Islands participated in NMLS. . . . This full representation of the . . . mortgage industry in a single system makes it possible for [federal and] state regulators and [the banking] industry to have the information needed to identify [not only] business and licensing activities and trends” but also mortgage fraud).

¹⁹ Cf., e.g., Randall K. Johnson, *Why Police Learn from Third-Party Data*, 3 WAKE FOREST L. REV. ONLINE 1, 4 (2013); Randall K. Johnson, *Do Police Learn from Lawsuit Data?*, 40 RUTGERS L. REC. 30, 37–38 (2012–2013).

²⁰ NMLS Resource Center, *State Model Language for Implementation of Public Law 110-289, Title V – S.A.F.E. Mortgage Licensing Act 5* (2014), <http://mortgage.nationwidelicencingsystem.org/SAFE/NMLS%20Document%20Library/MSL-Final.pdf> (last visited Aug. 30, 2014) (“in order to reduce the points of contact which the Federal Bureau of Investigation may have to maintain . . . the Commissioner may use the Nationwide Mortgage Licensing System and Registry as a channeling agent for requesting information from and distributing information to the Department of Justice.”).

²¹ Cf. Elizabeth Griffith, *Translating Research to Practice and Building Capacity to Use Data, Research, Planning and Problem-Solving*, TRANSLATIONAL CRIMINOLOGY, Spring 2014, at 9 (“The Bureau of Justice Assistance (BJA), the U.S. Department of Justice’s policy- and grant-making agency, has in recent years prioritized the use of data . . . to target and manage its resources . . . and build [on the DOJ’s] criminal justice professional capacity.”).

²² See, e.g., ROBERT V. WOLF, CENTER FOR COURT INNOVATION, A FULL RESPONSE TO AN EMPTY HOUSE: PUBLIC SAFETY STRATEGIES FOR ADDRESSING MORTGAGE FRAUD AND THE FORECLOSURE CRISIS 2 (2010) (report supported by BJA under federal grant).

²³ Nicole Forbes Stowell, Katherine Barker-Cagwin, and James Fellows, *Mortgage Fraud: Current Trends and Issues*, 37 REAL ESTATE ISSUES 42 (2012) (“According to the Internal Revenue Service (IRS), the number of mortgage and real estate fraud convictions increased by almost 40 percent from 2009 to 2011); accord IRS, *Statistical Data – Mortgage and Real Estate Fraud* (Sept. 1, 2014), <http://www.irs.gov/uac/Mortgage-and-Real-Estate-Fraud> (“Special agents with IRS Criminal Investigation are uniquely equipped to investigate these types of mortgage and illegal real estate crimes because they are skilled financial investigators whose mission is to ‘follow the money’”).

This improvement, however, raises an important question: can the NMLS help to detect and deter even more recording fraud?²⁴ The question is important because it acknowledges the benefits of the NMLS, while underscoring the need for more state-level regulation. This essay, therefore, answers the question as it pertains to deed fraud and lien fraud.²⁵ Part I provides background information about the NMLS. Part II calls for a modest expansion of the NMLS, so as to include local public records about deed fraud and lien fraud. Part III is the conclusion.

PART I. BACKGROUND

The NMLS was created by the Housing and Economic Recovery Act of 2008.²⁶ Title V of the Act, entitled the Secure and Fair Enforcement of Mortgage Licensing Act,²⁷ charges the NMLS with “the establishment of a national federal database that would register all mortgage [loan] originators. . . [and] the creation of a mandatory state licensing regime.”²⁸ As a result, the NMLS detects and deters one type of recording fraud (i.e. mortgage fraud).²⁹

Specifically, the NMLS limits mortgage fraud by making it possible for regulators to access information necessary for identifying illegal activity.³⁰ There are three reasons why. First, this online registry “improve[s] transparency and [the quality of] information available concerning state-licensed and registered

. . . . Once they have obtained the evidence, IRS agents forward their investigation to the Department of Justice for criminal prosecution.”)

²⁴ This question has not been asked or answered because state-level types of recording fraud were not a traditional focus of scholarly attention. Examples of these state-level types of recording fraud include deed fraud and lien fraud.

²⁵ Deed fraud and lien fraud are the focus of analysis for three reasons. First, these crimes have been under-theorized by scholars. Next, these crimes have become more popular over time. Lastly, local governments collect information about these crimes. *See, e.g., infra* Table 1. Fraudulent Document Notices in Cook County, Illinois (2009 to 2013).

²⁶ STATE REGULATORY REGISTRY, *supra* note 18, at 20. (“On July 30, 2008, President George W. Bush signed into law The Housing and Economic Recovery Act of 2008. Title V of this Act, entitled The Secure and Fair Enforcement for Mortgage Licensing Act of 2008, or the SAFE Act, contained provisions to enhance consumer protection and reduce mortgage fraud.”).

²⁷ 12 U.S.C. §§ 5101–5116 (2008).

²⁸ Kale Gans, Note, *Anatomy of a Mortgage Meltdown: The Story of the Subprime Crisis, The Role of Fraud, and the Efficacy of the Idaho SAFE Act*, 48 IDAHO L. REV. 123, 153–54 (2011).

²⁹ STATE REGULATORY REGISTRY, *supra* note 18, at 20 (“The SAFE Act contained specific mandates for NMLS. . . . They include: Establishing protocols for the issuance of NMLS Unique Identifiers. Receiving and processing of fingerprints for federal criminal history background checks for all MLOs. Developing and administering a qualified written test. Reviewing and approving pre-licensure and continuing education courses. Providing public access to licensing information on all residential mortgage licensed loan originators. Developing and implementing the NMLS Mortgage Call Report. Making publicly adjudicated disciplinary and enforcement actions available to the public. . . . [and facilitating] the collection and disbursement of consumer complaints.”).

³⁰ *See* STATE REGULATORY REGISTRY, *supra* note 18, at 8.

companies and professionals.”³¹ Second, the NMLS “facilitate[s] the sharing of regulatory enforcement information among [federal and] state regulators.”³² Finally, this online registry provides “easily accessible information” about the distribution, frequency and amount of mortgage fraud.³³

The NMLS, in other words, lowers the cost of regulation.³⁴ It does so by providing more complete information about mortgage fraud³⁵ and also identifies the underlying causes of these crimes.³⁶ Lastly, the online registry helps to address a range of information failures.³⁷

Within this context, it is clear why the NMLS helps to limit mortgage fraud.³⁸ First, this online registry “demonstrates . . . the institutional advantages that states have over the federal government.”³⁹ The NMLS also helps to detect and deter more crimes “by doing what is possible given the competing interests of the relevant parties and the structural constraints of horizontal federalism and

³¹ NMLS, REQUEST FOR PUBLIC COMMENTS: REPORTING OF STATE REGULATORY ACTIONS 1 (2011), <http://mortgage.nationwidelicencingsystem.org/news/ProposalsForComment/2011-3-Comments-for-Reg-Actions.pdf> (last visited Sept. 1, 2014).

³² *Id.*

³³ *Id.*

³⁴ *Cf.* Kristin Madison, *Health Regulators as Data Stewards*, 92 N.C. L. REV. 1605, 1607–08 (2014) (“The federal government is more than just a big data repository, however, it has become a data steward. The term ‘data stewardship’ can have many meanings, and it is sometimes associated with the responsibility for protecting the integrity and confidentiality of data. . . . One of the meanings of ‘steward’ is ‘one who actively directs affairs’ In recent years . . . the federal government has taken on an increasingly important role in managing the flow of health-related data. By doing so, it has affected health care decision making and accelerated . . . reform.”).

³⁵ *See, e.g.*, NMLS, *NMLS Mortgage Industry Report, 2014 Q1 Update* 7–8 (June 11, 2014), <http://mortgage.nationwidelicencingsystem.org/about/Reports/2014Q1-Mortgage-Report.pdf> (Last accessed on August 25, 2014).

³⁶ STATE REGULATORY REGISTRY, *supra* note 18 at 4. (This information has been gained in several ways, such as when the NMLS created a “nationwide pilot program [to test a] risk profiling tool [that used] Mortgage Call Report data to evaluate mortgage companies” and compare them to entities within their peer groups and “identify potential risky behavior.”).

³⁷ *Id.* at 20. (The NMLS overcomes informational asymmetries, for example, by making “publicly adjudicated disciplinary and enforcement actions available to the public. . . . As of year-end 2013, 40 state agencies had posted 3,100 public regulatory actions and federally-registered MLOs had reported 529 actions.”)

³⁸ *Cf.* Lloyd T. Wilson, Jr., *All Things Considered: The Contribution of the National Mortgage Licensing System to the Battle Against Predatory Lending*, 24 GA. ST. U. L. REV. 415, 430–31 (2007) (“State regulators are expected to benefit from the database as it will enhance their ability to ‘share information with other states’ Consumers are expected to benefit as the database will be a central information source that will provide consumers with a way to ‘check on the license status of the mortgage broker or lender they wish to do business with, as well as a way to determine whether a state has taken enforcement action against that company or individual.’ . . . Mortgage lending or brokering companies could similarly benefit from the database by using it as part of their . . . pre-employment screening.”).

³⁹ *Id.* at 473.

vertical federalism.”⁴⁰ Finally, this online registry makes “a positive contribution in its current form and has the potential, as it evolves . . . to accomplish even more.”⁴¹

PART II. DISCUSSION

This essay calls for a modest expansion of the NMLS to include local public records about deed fraud and lien fraud.⁴² The expansion should be embraced, especially by the DOJ, for three basic reasons. First, this expansion may be achieved at little-to-no cost.⁴³ It also could detect and deter more recording fraud.⁴⁴ Lastly, the expansion would help prevent future litigation.⁴⁵

A more comprehensive Recording Fraud Registry also could provide useful information about the distribution, frequency and amount of recording fraud.⁴⁶ This expanded registry may do so by collecting and analyzing local public records such as Fraudulent Document Notices.⁴⁷ These data then could be

⁴⁰ *Id.* at 474.

⁴¹ *Id.*

⁴² See *infra* Table 1. (Table 1 provides information about, and some analysis of, recording fraud in Cook County, Illinois. Similar data and analysis also would be available, only on a nationwide basis, through a Comprehensive Recording Fraud Registry.)

⁴³ STATE REGULATORY REGISTRY, *supra* note 18, at 25. (“To fund NMLS operations, functionality and enhancements, as well as to achieve the objectives of the SAFE Act, NMLS charges various fees for services provided. . . . Other NMLS services, such as . . . NMLS Consumer Access are provided at no charge to the user.”)

⁴⁴ Cf. NMLS Resource Center, *States Expand Use of NMLS to New Industries*, <http://mortgage.nationwidelicensingsystem.org/news/Pages/ExpandedUse.aspx>. (last visited Aug. 26, 2014) (this improved ability to detect, and deter, crime would not be without precedent: as the NMLS already helps to limit a variety of state-level crimes).

⁴⁵ See, e.g., Press Release, Dep’t of Justice, Office of Public Affairs, Nebraska “Sovereign Citizen” Convicted of Filing False Liens against Federal Officials and Federal Tax Crimes (Aug. 4, 2014), <http://www.justice.gov/opa/pr/2014/August/14-tax-818.html> (“A federal jury in Omaha, Nebraska, found Donna Marie Kozak guilty . . . of conspiracy to file and filing false liens against two U.S. District Court Judges, the U.S. Attorney for the District of Nebraska, two Assistant U.S. Attorneys and an Internal Revenue Service (IRS) special agent.”). Cf. David J. Cook, *Addressing the Problem of Bogus Liens*, 36 L.A. LAWYER MAGAZINE, DEC. 2012, at 12, 12 (“Litigants can be angry and irrational. . . . These individuals may file or record fraudulent liens to retaliate [against a property owner] Although these liens may be clearly illegitimate, their expungement requires a court order, costing victims significant time and effort.”).

⁴⁶ See *infra* Table 1.

⁴⁷ Letter from the Cook County Recorder of Deeds (CCRD) to author 1–2 (Apr. 10, 2014) (on file with author) (“[In Cook County, Illinois, the] . . . indexing of any document under the doc-type/index Fraudulent Document Notice is directly related to the customer submitting for recording a document actually titled “Fraudulent Document Notice” (or minor variation thereof). The index was created for customer convenience [by the Cook County Recorder of Deeds] The customer defined what was fraudulent within their Notice document, and recorded said Notice with CCRD historical public records library for customer’s own private purposes. . . . The CCRD library does not perform classifications. The CCRD simply indexes documents based on the specific document title appearing on the document exactly as prepared by the customer. If a document title is unclear,

made available through NMLS Consumer Access, which is a “fully searchable website that allows the public to view information [about NMLS registrants].”⁴⁸

It also must be recognized that some elected officials may oppose the recommendation, especially on due process grounds.⁴⁹ This opposition could be overcome in many ways. First, the NMLS could assure that, before any information is incorporated into NMLS Consumer Access, the accused has the opportunity to challenge any unfounded claims.⁵⁰ It also may guarantee that any data that has been expressly “protected by state law before submission . . . [remains] protected in the same way” after submission.⁵¹ Finally, the NMLS could provide an opportunity for the accused party to submit exculpatory information.⁵²

If this recommendation is accepted, then the NMLS will need an implementation plan. This plan may take several forms. For example, the NMLS could pursue a grant from the DOJ’s Office of Justice programs.⁵³ It also may seek federal legislative action to codify this recommendation. Lastly, the NMLS could negotiate a series of intergovernmental agreements.⁵⁴

the document may be indexed under Miscellaneous as a courtesy. Document numbers concerning any previously recorded document(s) (“underlying documents”) must be included by the customer within said Notice, in order for the CCRD to provide a software link between the Notice and the customer’s referenced documents.”). See *infra* Table 1 (Those data that are found in Table 1, which provide information and analysis of recording fraud in Cook County, Illinois over time, thus only represent those Fraudulent Document Notices with a Property Identification Number (PIN). Fraudulent Document Notices with a missing PIN, or that duplicate an earlier entry in the Recorder of Deeds’ database, are omitted from this analysis. There were three omissions in 2010, four omissions in 2011, five omissions in 2012 and 21 omissions in 2013.).

⁴⁸ See NMLS, *Information About NMLS Consumer Access* (July 7, 2014), <http://mortgage.nationwidelicencingsystem.org/licensees/resources/LicenseeResources/Information%20about%20NMLS%20Consumer%20Access.pdf> (last visited Aug. 7, 2014) (this approach would also provide victims of recording fraud with an administrative remedy against individuals or companies, which wrongfully cloud their titles.).

⁴⁹ See Christopher Walljasper, *If you think you own your own home, You’d better check the Deed on file with the County*, MEDILL REPORTS CHICAGO (Dec. 4, 2013), <http://news.medill.northwestern.edu/chicago/news.aspx?id=226205> (“Jeanne Ives, [an Illinois] Republican who represents the southwest suburbs, said that while she understands the dangers of [recording] fraud, [the Cook County Recorder’s 2013 reforms] were too heavy handed. . . . Jack Franks, a Democrat who represents a northwest suburban district, agrees. . . . ‘I don’t think there is empirical evidence that enhanced penalties will reduce these crimes.’”).

⁵⁰ Cf. Wilson, *supra* note 38, at 461.

⁵¹ *Id.* at 460.

⁵² Cf. *id.* at 462.

⁵³ DOJ, *Business and Grants*, <http://www.justice.gov/business/> (last visited Aug. 26, 2014) (“Office of Justice Programs offers federal financial assistance to scholars, practitioners, experts and state and local governments and agencies.”).

⁵⁴ Cf. STATE REGULATORY REGISTRY, *supra* note 18, at 20 (For example, an NMLS working group “developed a user agreement with [the Consumer Financial Protection Bureau (CFPB)] to allow a pilot group of states access to CFPB’s Government Portal, which is a gateway to the CFPB’s consumer complaint data base. Eleven state agencies participated in this pilot, which al-

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CONCLUSION

This essay argues for a modest expansion of the NMLS, in order to detect and deter more recording fraud. It does so, initially, by explaining why this online registry limits mortgage fraud. The essay later describes how the NMLS could detect or deter other crimes, such as deed fraud and lien fraud. Lastly, it deals with concerns about a Comprehensive Recording Fraud Registry.

lowed authorized users to search, filter and extract CFPB consumer complaint information related to the state agency's jurisdiction.”).

APPENDIX

Table 1. Fraudulent Document Notices in Cook County, Illinois (2009 to 2013)

TOWNSHIPS ⁵⁵	2009 ⁵⁶	2010 ⁵⁷	2011 ⁵⁸	2012 ⁵⁹	2013 ⁶⁰	TOTALS ⁶¹
BARRINGTON (100, 101)	0	0	0	0	0	0
BERWYN (110)	0	0	0	0	0	0
BLOOM (120, 121, 122)	0	2	0	1	1	4
BREMEN (130, 131)	0	1	0	0	0	1
CALUMET (140)	0	0	0	0	0	0
CICERO (150)	0	0	0	0	0	0
ELK GROVE (160, 161, 164)	0	0	0	0	0	0
EVANSTON (170)	0	0	0	0	0	0
HANOVER (180, 181)	0	0	0	0	0	0
LEMONT (190)	0	0	0	0	0	0
LEYDEN (200, 201, 202, 204)	0	0	0	0	0	0

⁵⁵ Office of the Cook County Clerk, *Tax Code Rate Summary 1–158* (July 6, 2012).

⁵⁶ Office of the Cook County Recorder, *Fraudulent Document Notices: 2009 to 2013*, <http://12.218.239.81/i2/default.aspx#> (2014) (displaying an interface that permits the entry of information, which identifies fraudulent document notices over time, by entering: From: 01/01/20xx, To: 12/31/20xx, Document Type: Fraudulent Doc Notice, and Search); Office of the Cook County Assessor, *Property Characteristics, 2014 Tax Year Property Information*, www.cookcountyassessor.com/Captcha/VerificationPage.aspx?Pin=16133040220000 (2014) (displaying an interface that permits the entry of a property's 14-digit PIN, which identifies its geographic location by township).

⁵⁷ *Id.*

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *Id.*

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LYONS (210, 211, 212, 214)	0	0	0	0	0	0
MAINE (220, 221, 222)	0	1	0	0	0	1
NEW TRIER (230, 234)	0	0	0	0	0	0
NILES (240, 244)	0	0	0	0	0	0
NORTHFIELD (250, 251, 252)	1	0	0	0	0	1
NORWOOD PARK (260)	0	0	0	0	0	0
OAK PARK (270)	0	0	0	0	0	0
ORLAND (280)	0	0	0	0	0	0
PALATINE (290, 291)	0	0	0	0	0	0
PALOS (300)	0	0	0	0	0	0
PROVISO (310, 311, 314)	0	0	1	1	0	2
RICH (320, 321, 324)	0	0	0	1	1	2
RIVER FOREST (330)	0	0	0	0	0	0
RIVERSIDE (340)	0	0	0	0	0	0
SCHAUMBURG (350)	0	0	0	1	0	1
STICKNEY (360, 361)	0	0	1	0	0	1
THORNTON (370, 371, 372)	0	1	3	2	2	8
WHEELING (380, 381, 382)	0	0	0	0	0	0
WORTH (390, 391)	1	0	0	0	0	1
HYDE PARK (700)	2	4	2	1	4	13
JEFFERSON (710, 711)	0	0	0	5	1	6
LAKE (720, 721)	0	6	2	3	3	14

LAKE VIEW (730)	0	0	1	0	1	2
NORTH CHICAGO (740)	0	1	0	0	0	1
ROGERS PARK (750)	0	0	0	0	0	0
SOUTH CHICAGO (760, 765)	0	0	0	0	0	0
WEST CHICAGO (770)	0	1	0	1	2	4
COOK COUNTY TOTALS	4	17	10	16	15	62

