

STATE OF ILLINOIS  
COUNTY OF COOK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS,  
- COUNTY DEPARTMENT - CHANCERY DIVISION -

BANK OF AMERICA N.A.

Plaintiff,  
vs

KEITA R RICHARD, SECRETARY OF HOUSING AND URBAN  
DEVELOPMENT, ILLINOIS HOUSING DEVELOPMENT  
AUTHORITY, A BODY POLITIC AND CORPORATE,  
UNKNOWN OWNERS AND NON-RECORD CLAIMANTS  
Defendant(s).

Case No. 2016 CH 12952

Cal No.: 63

Property Address:  
14325 S. STATE STREET  
RIVERDALE, IL 60827-0000

**AFFIDAVIT OF AMOUNTS DUE AND OWING**

I, Chrysophata Fowler, hereby deposes and affirms under oath:

I am employed as a Authorized Representative for PennyMac Loan Services, LLC, Servicer for Bank of America, N.A. I have authority to make this affidavit because I am a person familiar with the business and its mode of operation. In the regular performance of my job functions at PennyMac Loan Services, LLC, I am familiar with the business records maintained by PennyMac Loan Services, LLC for the purpose of servicing mortgage loans, collecting payments and pursuing any delinquencies. PennyMac Loan Services, LLC, Servicing Records typically include electronic data compilations and imaged documents pertaining to the loans it services.

To the extent that the business records of the loan in this matter were created by a prior servicer, the prior servicer's records for the loan were integrated and boarded into PennyMac Loan Services, LLC, systems, such that the prior servicer's records concerning the Loan are now part of PennyMac Loan Services, LLC, business records. PennyMac Loan Services, LLC, maintains quality control and verification procedures as part of the boarding process to ensure the accuracy of the boarded records. It is the regular business practice of PennyMac Loan Services, LLC, to integrate the prior servicer's records into PennyMac Loan Services, LLC, business records, and to rely upon the accuracy of those boarded records in providing its loan servicing functions. These prior servicer records are integrated and relied upon by PennyMac Loan Services, LLC, as part of PennyMac Loan Services, LLC, business records.

Based on my training and personal knowledge of the processes by which they are created and maintained, PennyMac Loan Services, LLC, Servicing Records were made at or near the time by, or from information provided by, persons with knowledge of the activity and transactions reflected in such records, and are kept in the ordinary course of business activity regularly conducted by PennyMac Loan Services, LLC. It is the regular practice of PennyMac Loan Services, LLC, mortgage servicing business to make and update its

Servicing Records. If called to testify at the trial of this matter, I could competently testify as to the facts contained in this affidavit.

PennyMac Loan Services, LLC acquired the servicing rights from the Defendant's loan on 11/01/14 from Bank of America, N.A.. At the time of this transfer, the Defendant's loan had an unpaid principal balance of \$ 81074.54.

The amount due is based on my review of the following records: MSP

\_\_\_\_\_. A true and accurate copy of these records, which I used when making this calculation is attached to this affidavit.

PennyMac Loan Services, LLC, uses MSP software to automatically record and track mortgage payments. This type of tracking and accounting program is recognized as standard in the industry. When a mortgage payment is received, the following procedure is used to process and apply the payment, and to create the records I reviewed: Each entry in the records is made contemporaneously with the corresponding event by PennyMac Loan Services, LLC, personnel with direct knowledge thereof, acting in the regular course of business and not in anticipation of litigation.

The record is made in the regular course of PennyMac Loan Services, LLC business. In the case at bar, the entries reflecting the Defendant's payments were made in accordance with the procedure detailed above, and these entries were made at or near the time the payment was received.

MSP software accurately records mortgage payments when properly operated. In the case at bar, MSP software was properly operated to accurately record the Defendant's mortgage payments.

Based on the foregoing, KEITA R RICHARD failed to pay amounts due under the Note, and the amount due and owing as of 03/01/14, is:

- |                                       |             |
|---------------------------------------|-------------|
| ● Principal                           | \$81,074.54 |
| ● Interest                            | \$5,051.08  |
| ● Escrow Advance                      | \$5,970.97  |
| ● County Tax (\$4,105.97)             |             |
| ● H.O. Insurance Premium (\$1,865.00) |             |
| ● Total Fees                          | \$58.50     |
| ● Recoverable Balance                 | \$2,738.75  |

GROSS AMOUNT DUE \$94,893.84

Less/Plus balance in

reserve account \$ \_\_\_\_\_

NET AMOUNT DUE

\$94,893.84

plus reasonable attorney's fees and costs.

The Servicing Records pertaining to Defendant's, KEITA R RICHARD, account further reveal that there has been a default in the Defendant's Note and Mortgage, and that sufficient and certified moneys to cure the default have not been tendered, nor have there been any agreed extensions, modifications or agreements between the parties to delay this foreclosure action.

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure, I certify that the statements herein are true and correct.

Executed at Fl. Worth, TX, on 10/16/17.

PennyMac Loan Services, LLC, Servicer for Bank of America, N.A.

By: Chrysophata Fowler

Signature: [Signature]

Name: Chrysophata Fowler

Title: Authorized Representative

AFFIANT STATES NOTHING MORE

STATE OF TEXAS

COUNTY OF TARRANT

)  
) SS:  
)

Subscribed and Sworn to before me on October 16, 2016.

Elsie Kroussakis  
NOTARY PUBLIC

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