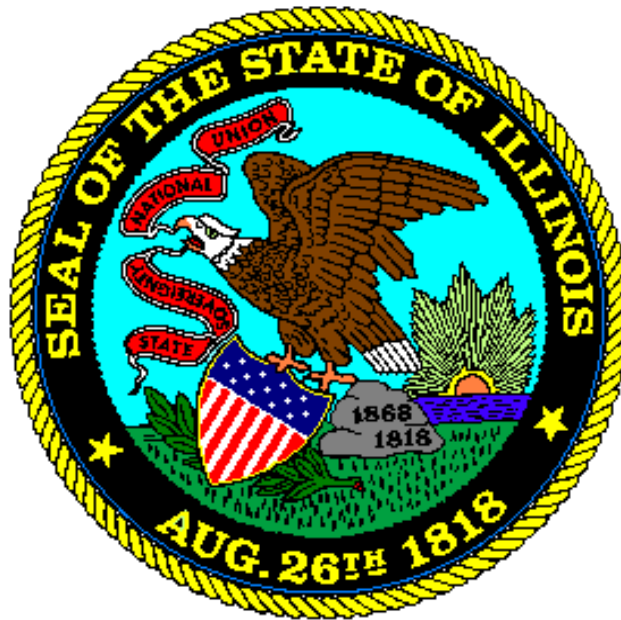


**Anti-Predatory Lending Database
Semi-Annual Summary Report
November 1, 2025**



**Governor JB Pritzker
Secretary Mario Treto, Jr.
Department of Financial and Professional Regulation**

ABOUT THE INFORMATION IN THIS REPORT

THIS REPORT IS BASED ON STATISTICAL INFORMATION FROM THE ANTI-PREDATORY LENDING DATABASE ("APLD") PURSUANT TO 765 ILCS 77/70. THE APLD WENT INTO EFFECT ON JULY 1, 2008.

Illinois Department of Financial and Professional Regulation

Office of the Secretary

JB Pritzker
Governor

Mario Treto, Jr.
Secretary

November 1, 2025

Governor JB Pritzker
207 State House
Springfield, IL 62706

Illinois General Assembly
State House
Springfield, IL 62706

Dear Governor Pritzker & Members of the General Assembly:

As required by Section 70(k) of the Residential Real Property Act, enclosed is the Department's semi-annual report detailing certain findings regarding the Anti-Predatory Lending Database Program. We are grateful for the opportunity to provide you with this report. If you have any questions, please do not hesitate to contact me at (217) 785-2165 or Mario.Treto@Illinois.gov.

Very truly yours,

A handwritten signature in blue ink that reads "Mario Treto, Jr." with a stylized flourish at the end.

Mario Treto, Jr.

Summary of Anti-Predatory Lending Database (APLD) Program

- As a result of the financial crises in 2008, in part due to predatory mortgage loans, the APLD was conceived. The APLD's purpose is to combat predatory lending practices by increasing the borrowers' understanding of the loans they are considering and thereby reduce the number of foreclosures resulting from inappropriate loans. The act does not prohibit any type of loan. It is solely the borrowers' decision whether to proceed. The APLD also collects important data to allow the Department to track mortgage lending trends and provides data to support other investigations.
- Loans that trigger the APLD's counseling requirement continue to be offered in the program area and represent approximately 0.7% of all loans entered into the APLD. Loans that trigger the counseling requirement include adjustable rate, interest-only and negative amortization loans, as well as loans with points and fees exceeding 5% of principal, and loans with prepayment penalties.
- Product offering trend data suggests the APLD's counseling requirement has deterred loan originators from offering loans with predatory or non-traditional characteristics. Since the program's inception, a total of 16,842 loans required borrower counseling. Of these, 4,064 (24%) loans were closed, and 12,778 (76%) were not closed. In comparison, for *all* loans registered with the APLD since inception the closing rate was 55%.
- On average, it takes 3.9 *fewer* days to close a loan *with* counseling than to close a loan *without* counseling (calculated since program inception on July 1, 2008). This differential has been steadily changing from a high point of 8 days *longer* in 2010.
- APLD data has supported investigations and disciplinary actions by enabling IDFPR to uncover fraudulent lending activity, unlicensed activity, unregistered loan originators, unreported branch offices and unreported changes of a licensee location.
- IDFPR examiners routinely access the database's reporting capabilities to analyze data in real time, which has enhanced examination capabilities. Reports from the APLD are required for all examinations and have been used to support findings and ratings.
- IDFPR has found no evidence that the APLD restricts responsible mortgage lending in the four-county program area of Cook, Will, Kane, and Peoria counties.

APLD FACTS AT A GLANCE¹

(Cumulative to date since program inception on July 1, 2008)

- Loans registered with the APLD: **2,293,098**
- Loans closed: **1,261,909**
- Borrowers requiring counseling: **21,617**
- Borrowers receiving counseling: **7,330**
- Borrowers requiring counseling by county: Cook (**17,342**); Kane (**1,109**); Peoria (**317**); Will (**2,031**); n/a (**818**)²
- Borrowers receiving counseling by county: Cook (**6,523**); Kane (**156**); Peoria (**20**); Will (**217**); n/a (**414**)³
- Loan types requiring counseling:⁴
 - Interest-Only Loans: **3,744**
 - Negative Amortization Loans: **2,129**
 - Loans with Points and Fees Exceeding 5%: **7,596**
 - Loans with Prepayment Penalty: **2,751**
 - Adjustable Rate Loans: **2,654**
- **42,222** loans triggered the counseling requirement as originally entered but were thereafter modified to no longer require counseling.
- Actively licensed mortgage brokers/loan originators who have entered loans into the APLD: **11,926**⁵

Investigations and Other Regulatory Actions Based on APLD Information

During the current reporting period, April 1, 2025, through September 30, 2025, IDFPR entered two consent orders for APLD violations. One consent order involved a title company and the other involved a mortgage banking company. Both consent orders include fines and required enhanced employee training on the APLD. The mortgage banking company also has to audit APLD activity each quarter and report audit findings to IDFPR. Additionally, IDFPR opened five new investigations into possible APLD violations during the current reporting period. A

¹ Statistics for each county can be found in the table on page 9.

² Loans with invalid zip codes.

³ Loans with invalid zip codes.

⁴ The total number of loans reflected in this section does not match the total number of borrowers requiring counseling because individual mortgage loans often have more than one borrower, borrowers may have chosen not to attend counseling (and thus not proceeded with the loan), or the loan may have contained multiple counseling triggers.

⁵ Number reduced from previous reports to exclude brokers and originators who have not entered a loan into the APLD.

number of investigations remain ongoing. Seven mortgage banking companies disciplined in previous reporting periods continue to audit their APLD activity and report to IDFPR quarterly.

Types of Non-Traditional Mortgage Products Being Offered and Lending Trends

During the current reporting period of April 1, 2025, through September 30, 2025, the number of loan applications registered in the APLD increased for the third consecutive reporting period. During the current reporting period, the number of loan applications increased by over 30%. This is a larger increase than the increase noted in the previous reporting period, which was approximately 7%. The 72,646 loan applications registered in the APLD during the current reporting period is the highest reported amount during the last three years. The reporting period ending March 31, 2022, had a higher number of loan applications, with 98,595 loan applications registered in APLD.

During the current reporting period, there was a notable increase in homeowners refinancing their primary residence. During the current reporting period, there were 19,520 loan applications from borrowers refinancing their primary residence, while during the previous reporting period, there were 15,664 loan applications. This reflects an increase of approximately 24%. While the percentage of refinance loan applications to total loan applications had increased during the past four reporting periods, the percentage of refinance loan applications to total loan applications decreased during the current reporting period. Loan applications for refinance are approximately 26% of total loan applications during the current reporting period.

During the current reporting period, there was a larger increase in loan applications from borrowers who were purchasing a primary residence. The number of loan applications from borrowers purchasing a primary residence increased by 39% during the current reporting period. Loan applications from first time home buyers showed the largest increase during the current reporting period, increasing by 44% over the previous reporting period. Loan applications from borrowers purchasing a primary residence account for approximately 62% of all loan applications during the current reporting period. Loan applications from first time home buyers are approximately 55% of all loan applications registered during the current reporting period.

Approximately 44% of loan applications registered in the APLD proceeded to closing during the current period. During the previous reporting period, approximately 46% of loan applications registered in the APLD proceeded to closing.

For the previous four consecutive reporting periods, there was an increase in loan applications requiring housing counseling before closing due to predatory or non-traditional terms. During the current reporting period, the number of loans requiring housing counseling for predatory or non-traditional terms decreased. This decrease occurred despite the increase in total loan applications registered in the APLD. The number of loan applications requiring counseling for predatory or non-traditional terms decreased by 26% during the current reporting period.

The number of borrowers receiving housing counseling through the APLD program increased during the current reporting period. Borrowers receiving housing counseling increased by approximately 46% over the previous reporting period. The number of borrowers receiving

housing counseling during the current reporting period was higher than the last five consecutive reporting periods. Likewise, the number of loan offers modified to remove predatory and non-traditional terms was the higher than the last five consecutive reporting periods.

During the current reporting period, the number of loan offers requiring housing counseling because they permit interest only payments increased by nearly 15%. The remaining types of loan terms requiring housing counseling due to predatory or non-traditional features decreased during the current reporting period. The type of predatory or non-traditional loan term most prominently offered during the current reporting period is points and fees exceeding 5% of the loan amount. Loan offers with points and fees exceeding 5% of the loan amount account for nearly 75% of the loans requiring housing counseling during the current reporting period.

Nationwide data from Freddie Mac showed an increase in loan applications in September of 2025, compared to September of 2024.⁶ Freddie Mac reported that refinance applications increased by 42%, while applications to purchase a home increased by 18%.⁷ Freddie Mac also reported, in its Second Quarter 2025 Business Results, that 53% of new single-family home purchase loans were made to first time home buyers.⁸

During the current APLD reporting period, Freddie Mac's Primary Mortgage Market Survey identified a range of interest rates for a 30-year fixed rate mortgage loan.⁹ The highest interest rate was 6.89% in May of 2025 and the lowest was 6.26% in September of 2025.¹⁰ Freddie Mac noted the decrease in interest rates drove refinance applications to reach 60% of all mortgage applications in September of 2025, the highest percentage of refinance applications since January of 2022.¹¹ Additionally, Freddie Mac noted that home sale inventory improved over the summer of 2025.¹² This improved home inventory has led to purchase application activity.¹³

Freddie Mac's Second Quarter 2025 Financial Results Supplement noted that home price appreciated 6% in Illinois from the previous year.¹⁴ Fannie Mae is forecasting a moderation in national home price growth in 2025, predicting a growth rate of less than half of the growth rate of 2024.¹⁵ Similarly, the Mortgage Bankers Association stated the decrease in interest rates and slower home price appreciation will help improve affordability for mortgage borrowers.¹⁶

The APLD's benefit to borrowers is evident during the current reporting period as more borrowers have taken advantage of the APLD's housing counseling sessions. Borrowers who receive housing counseling will benefit from increased knowledge and understanding of the

⁶ [Mortgage Rates Inch Up | Freddie Mac](#)

⁷ [Mortgage Rates Inch Up | Freddie Mac](#)

⁸ [Freddie Mac CFO Discusses Second Quarter 2025 Financial and Business Results - Freddie Mac](#)

⁹ [Mortgage Rates - Freddie Mac](#)

¹⁰ [Mortgage Rates - Freddie Mac](#)

¹¹ [Mortgage Rates Continue to Move Down | Freddie Mac](#)

¹² [Mortgage Rates Remain Essentially Flat | Freddie Mac](#); [Mortgage Rates Creep Lower | Freddie Mac](#); [Heading into the Holiday Weekend, Mortgage Rates Decrease | Freddie Mac](#)

¹³ [30-Year Fixed-Rate Mortgages Average 6.86% | Freddie Mac](#)

¹⁴ [2025 2Q ER Exhibit 99.2](#)

¹⁵ [Expert Panel Anticipates Home Price Growth Will Moderate | Fannie Mae](#)

¹⁶ [Mortgage Application Payments Decreased in August | MBA](#)

terms of the mortgage loans they are offered. This will enable borrowers to make informed decisions about the financing of their homes. Finally, during the current reporting period, many borrowers benefitted from their loan offers being modified to remove predatory or non-traditional terms.

IDFPR Utilization of APLD Data to Combat Mortgage Fraud, Predatory Lending, and Other Questionable Practices

IDFPR prioritizes APLD investigations involving incidents where borrowers were required to receive housing counseling before closing, but did not receive it. These investigations are opened against both the title companies and mortgage banking companies involved. During the current reporting period, IDFPR also reviewed APLD data in connection with other types of mortgage banking and title company investigations. Lastly, IDFPR continues to coordinate with county recorder's offices to identify and investigate altered APLD certificates presented for recording.

STATISTICAL INFORMATION

Required Data Pursuant to Act:	October 2025 Reporting Period (04/01/25 - 09/30/25)	April 2025 Reporting Period (10/01/24 - 03/31/25)
Loans Registered with APLD¹⁷	72,646	54,247
Refinancing Primary Residence	19,520	15,664
Purchasing Primary Residence	45,530	32,741
First Time Home Buyers	40,648	28,183
Loans Closed in APLD	32,092	25,121
Borrowers Requiring Counseling	575	763
Borrowers Receiving Counseling	22	15
Loans Requiring Counseling¹⁸	478	647
Interest Only Loans	102	89
Negative Amortization Loans	3	2
Loans with Points and Fees Exceeding 5%	356	440
Loans with Prepayment Penalty	23	5
Adjustable Rate Loans	87	195
Loans Modified to No Longer Require Counseling	766	703
Loans Exempt from APLD	51,568	44,371

¹⁷ The totals may include loans that are in process or have been abandoned.

¹⁸ The number of loans requiring counseling is often less than the number of borrowers requiring counseling because there may be multiple borrowers per loan.

Required Data Pursuant to Act:¹⁹	October 2025 Reporting Period (04/01/25 - 09/30/25)			
	Cook County	Kane County	Peoria County	Will County
Loans Registered with APLD²⁰	53,786	6,592	1246	10,486
Refinancing Primary Residence	13,870	1918	338	3,229
Purchasing Primary Residence	33,825	4,136	848	6,463
First Time Home Buyers	30,795	3,480	688	5,482
Loans Closed in APLD	23,203	3,263	674	4,902
Borrowers Requiring Counseling	440	40	14	57
Borrowers Receiving Counseling	8	2	0	0
Loans Requiring Counseling²¹	360	35	12	48
Interest Only Loans	80	13	1	6
Negative Amortization Loans	1	1	0	0
Loans with Points and Fees Exceeding 5%	263	33	9	38
Loans with Prepayment Penalty	2	11	0	0
Adjustable Rate Loans	69	2	2	9
Loans Modified to No Longer Require Counseling	565	61	21	108
Loans Exempt from APLD	33,271	3,718	614	4,981

¹⁹ County totals may be lower than the overall totals because some loans do not have county information recorded in the database.

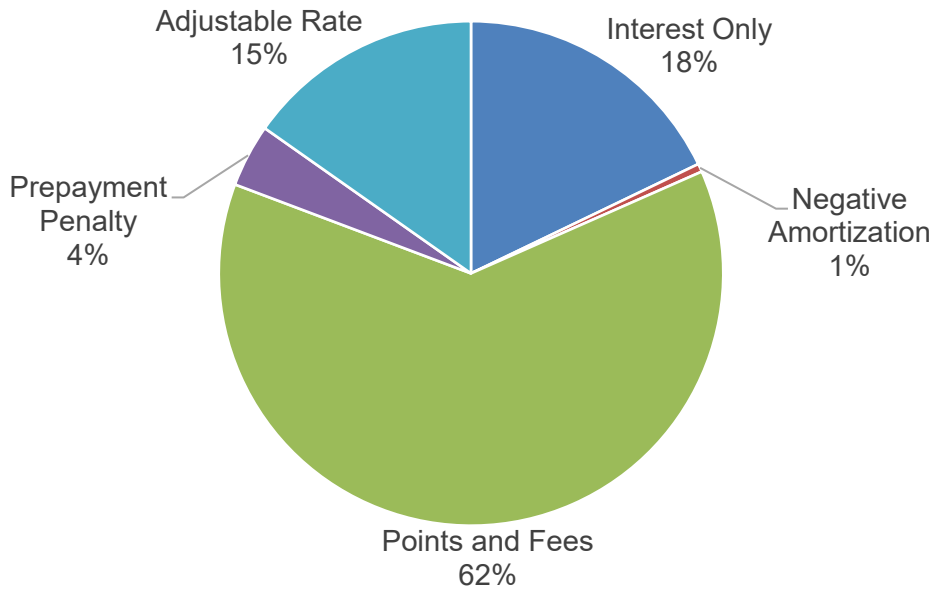
²⁰ The totals may include loans that are in process or have been abandoned.

²¹ The number of loans requiring counseling is often less than the number of borrowers requiring counseling because there may be multiple borrowers per loan.

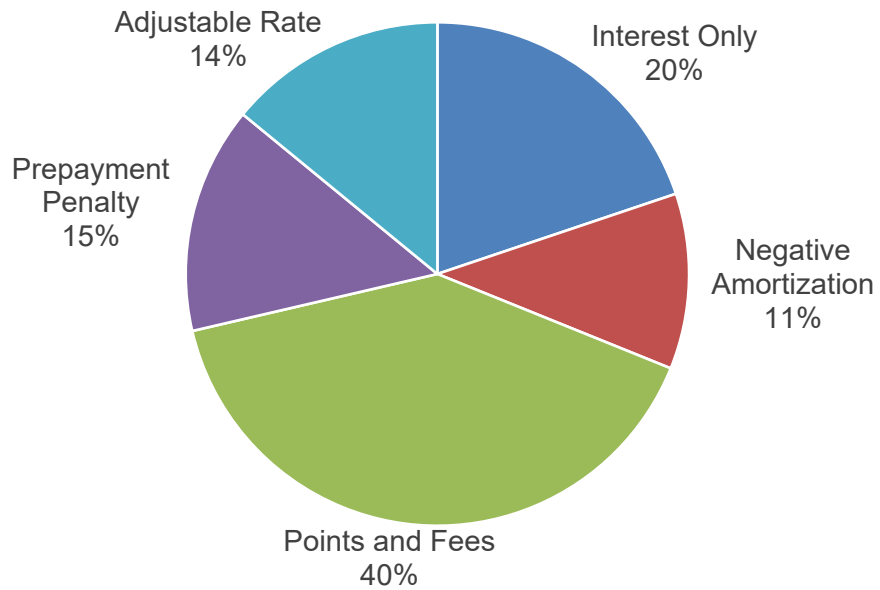
APLD Product Summary

Types of Loans Triggering the Counseling Requirement

Reporting Period (4/1/2025 - 9/30/2025)

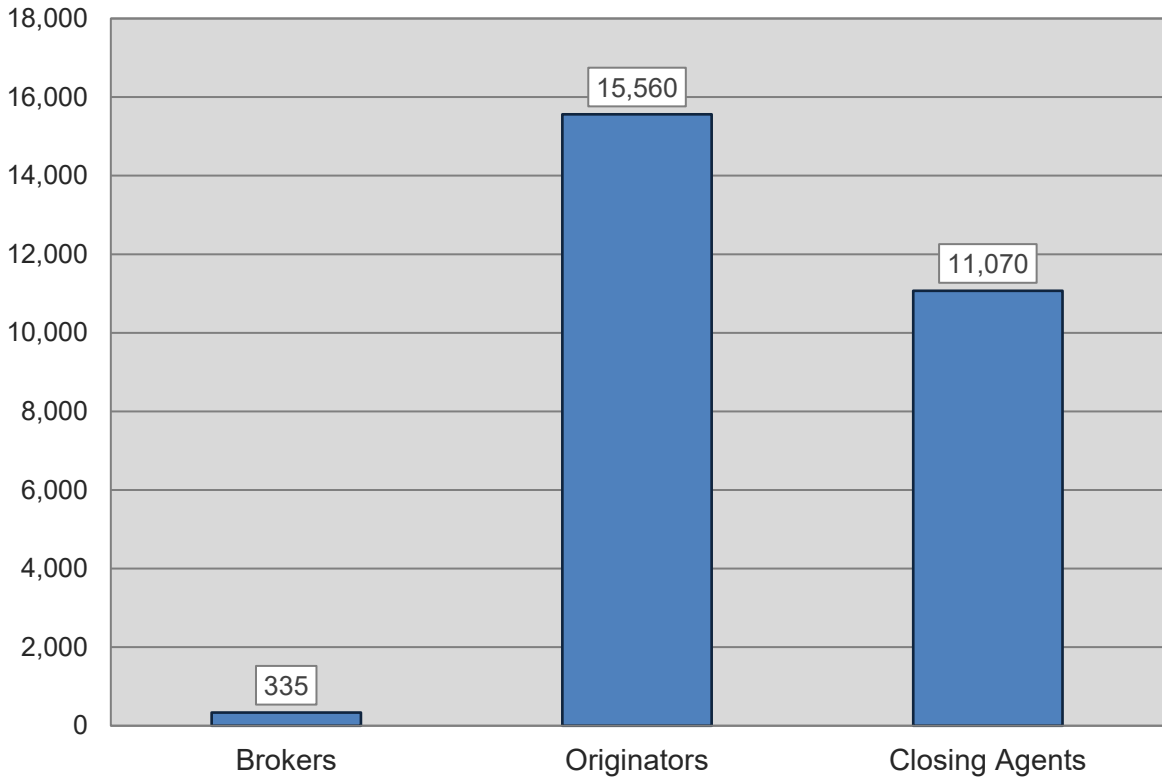


Since Inception



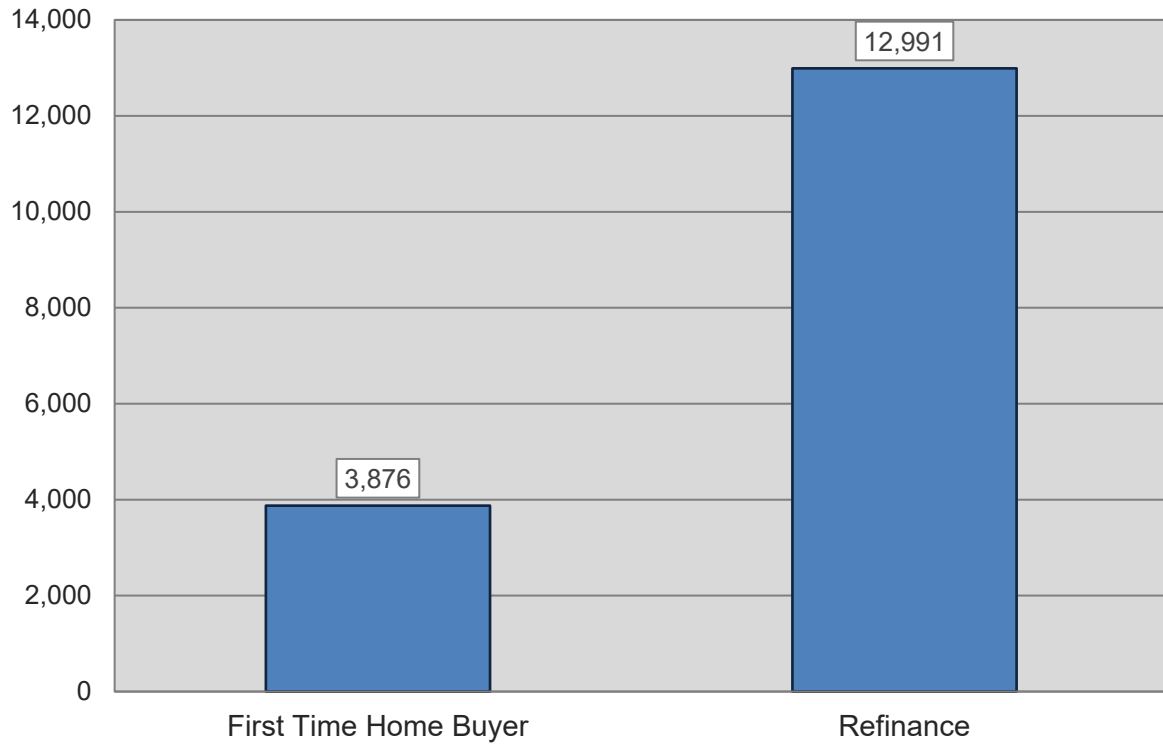
APLD User Summary

**Number of Individual Brokers, Loan Originators, and Closing Agents with Access to the APLD in the Four County Program Area
(Since program inception)**



APLD Loan Profile

The majority of loans requiring counseling are refinances of existing properties.
(Since program inception)



Summary of Average Time to Closing

Counseling requirement decreased time to close by 3.9 days on average.
(Since program inception)

