



Division of Human Rights

KATHY HOCHUL
Governor

MARIA L. IMPERIAL
Commissioner

April 14, 2022

VIA EMAIL

Gunnar Larson
xNY,io
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Dear Mr. Larson:

The Division is in receipt of your Freedom of Information Law (FOIL) request, received by the Division on March 28, 2022, in which you requested the following concerning:

2021 Apple Card Report

We would like to receive any and all records, relating to NY-DFS' 2021 Apple Card Investigation. This is one part of a broader discussion we must have about equal credit access. On March 23, 2021, Ms. Linda Lacewell published NY-DFS' Findings on Apple Card and its Underwriter Goldman Sachs Bank. As the former Superintendent of NY-DFS, Ms. Lacewell's stone faced propaganda assured that Apple Card did not discriminate against women, while under Goldman Sachs management. The red flags started to appear when an authorized user drew attention to the following: A person who relies on a spouse's access to credit, and only accesses those accounts as an authorized user, may incorrectly believe they have the same credit profile as the spouse. We recently collated 61 highlights to the Report on Apple Card Investigation from March 2021:

[https://drive.google.com/file/d/1xH16OKyuXzB-](https://drive.google.com/file/d/1xH16OKyuXzB-MVqIznMWDE9w8RRdmZCw/view)

[MVqIznMWDE9w8RRdmZCw/view](https://drive.google.com/file/d/1xH16OKyuXzB-MVqIznMWDE9w8RRdmZCw/view) The Apple Card

investigation was to assess women's access to equitable finance. The integrity of the Apple Card investigation must be rationally considered as flawed. We would like to receive any and all records of Ms. Linda Lacewell's (emails, texts, and similar) involvement with the 2021 Apple Card report. We would like to receive any and all records to NY-DFS association to evaluating Ms. Linda

Lacewell's ability to score a report specific to the Apple Card's core subject of credit access for women. Finally, we would like to receive any and all records related to NY-DFS guidance on Interlocking Directorates ([https://www.dfs.ny.gov/apps and licensing/banks and trusts/other/Permission for Interlocking Directors and Officers](https://www.dfs.ny.gov/apps_and_licensing/banks_and_trusts/other/Permission_for_Interlocking_Directors_and_Officers)), specific to Apple's Board of Directors and Goldman Sachs' Board of Directors.

Due to the substantial number of FOIL requests received by the Division, please be advised the Division will notify you in writing of its response to your request within thirty (30) business days of this letter, no later than May 26, 2022.

As part of the ongoing response to the COVID-19 pandemic, some or all agency employees may be working off-site. As such, there may be delays in response to FOIL requests. If a record responsive to a request is only available in hard-copy format, that record's availability will be limited until further notice. Thank you for your patience during this extraordinary time.

Very truly yours,



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FOIL Officer