



ANTI-MONEY LAUNDERING AND SUSPICIOUS ACTIVITY ATTESTATION

The Broker named below represents that he/she has implemented a program consistent with the federal rules concerning Anti-Money Laundering (AML) programs and Suspicious Activity Report (SAR) filing requirements for Residential Mortgage Lenders and Originators (RMLO) as outlined in 31 CFR Parts 1010 and 1028 (Final Rule).

The following summary is provided for reference only and is not intended to be relied upon as compliance advice.

According to the Final Rule, the Broker must, (1) develop and implement an AML program and (2) file a SAR to report any fraudulent attempts to obtain a mortgage or launder money by use of proceeds of other crimes to purchase residential real estate.

Under the Final Rule, the Brokers' AML program must be in writing, be reviewed and updated annually and must assess the risk assessment across all of the Broker's products, services, customers and geographic locations. Additionally, the Broker's AML program must have, at a minimum:

- Internal policies, procedures and controls,
- A designated Compliance Officer,
- An employee training program, and
- An independent audit function.

According to the Final Rule, the Broker must file a SAR within thirty (30) days of becoming aware of a transaction that:

- Involves funds derived from illegal activity or are conducted to hide funds or assets derived from illegal activity;
- Is designed to evade Bank Secrecy Act requirements;
- Has no business or apparent lawful purpose, or
- Involves the use of the company to facilitate criminal activity.

By signing below, the Broker agrees and attests to his/her compliance with the terms as set forth in the Final Rule.

Broker of Record Printed Name

Broker of Record Signature

Date

Owner/Principal Printed Name

Owner/Principal Signature

Date