

**State of Michigan  
 Department of Insurance and Financial Services  
 Office of Consumer Finance  
 Mortgage Broker/Lender/Servicer  
 Officer/Manager Questionnaire**

This questionnaire is to be completed by either an officer or a manager of the licensee/registrant. The information provided in this report is considered confidential as it is intended for use during the licensee/registrant's examination or investigation, conducted under the Mortgage Brokers, Lenders, and Servicers Licensing Act (MBLSLA), the Secondary Mortgage Loan Act (SMLA), and/or the Consumer Financial Services Act (CFSA). Please attach additional pages as necessary.

<p>1. Does the licensee/registrant have any affiliated companies?                  • If yes, attach a list and describe the affiliation.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. In the last two years, has the licensee/registrant made, brokered, or serviced any reverse mortgages secured by Michigan property?                  • If yes, check all that apply.  <input type="checkbox"/> HECM <input type="checkbox"/> Proprietary _____</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>3. In the last two years, has the licensee/registrant brokered, made, or serviced any first lien mortgages secured by Michigan property?                  • If yes, indicate the type of activity.  <input type="checkbox"/> broker <input type="checkbox"/> lender <input type="checkbox"/> servicer</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>4. In the last two years, has the licensee/registrant brokered, made, or serviced any junior-lien mortgages secured by Michigan property?                  • If yes, indicate the type of activity.  <input type="checkbox"/> broker <input type="checkbox"/> lender <input type="checkbox"/> servicer</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>5. In the last two years, has the licensee/registrant acted as a master servicer for any mortgage loans secured by Michigan property?                  • If yes, provide a list of all loans sub-serviced, identifying the sub-servicer for each loan.                  • In addition, provide copies of any contracts or agreements.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>6. Does the licensee/registrant charge a fee for locking an interest rate on Michigan mortgage loans?                  • If yes, does the licensee/registrant have a written rate lock agreement?                  • Provide a copy.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No   <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

<p>7. Does the licensee/registrant have a warehouse line(s) of credit or other form of credit for funding Michigan mortgage loans, or used in connection with the servicing of mortgage loans?</p> <ul style="list-style-type: none"> <li>• If yes, attach a copy of the agreement(s), and</li> <li>• a list of the loans currently outstanding on the line(s) of credit,</li> <li>• and a six-month aging report.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>8. Does the licensee/registrant impose a minimum mortgage loan amount greater than \$10,000 or a minimum home improvement loan amount greater than \$1,000 for mortgage loans secured by Michigan property?</p> <ul style="list-style-type: none"> <li>• If yes, please explain and identify any minimum imposed.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>9. Does the licensee/registrant maintain policies concerning its criteria for approval or denial of a Michigan mortgage loan?</p> <ul style="list-style-type: none"> <li>• If yes, provide a copy of the policy.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>10. Is the licensee/registrant currently delinquent (more than 60 days past due) on any account owed to a vendor, such as an appraiser or credit reporting agency, tax service provider, or a foreclosure attorney?</p> <ul style="list-style-type: none"> <li>• If yes, explain.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>11. In the last two years, has the licensee/registrant assigned any first-lien Michigan mortgage loans to individual investors, as that term is defined under the MBLSLA?</p> <ul style="list-style-type: none"> <li>• If yes, provide documentation that verifies the investor met the requirements described in Section 29(1)(c)(iii)(A) and (B) of the MBLSLA.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>12. Does the licensee/registrant conduct any activities at the business location(s) other than mortgage activity?</p> <ul style="list-style-type: none"> <li>• If yes, explain.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>13. In the last two years, has the licensee/registrant had any branch or satellite offices?</p> <ul style="list-style-type: none"> <li>• If yes, attach a list identifying the location, dates opened or closed, whether the branch originates Michigan mortgage loans, as well as a description of any servicing functions performed at each location.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>14. In the last two years, has any business agreement between the licensee/registrant and a lender, an investor, or a sub-servicer been terminated by either party, for reasons other than insufficient volume?</p> <ul style="list-style-type: none"> <li>• If yes, explain.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

<p>15. In the last two years, has any regulatory action been taken against any license/registration held by the licensee/registrant or its principals?</p> <ul style="list-style-type: none"> <li>• If yes, explain.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>16. In the last two years, has the licensee/registrant had an audit of its books and records, either financial or regulatory in nature, which includes any examinations by other state or federal regulators?</p> <ul style="list-style-type: none"> <li>• If yes, provide a list with dates of audit and current status.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>17. Has the licensee/registrant performed any quality control reviews, either internally or externally?</p> <ul style="list-style-type: none"> <li>• If yes, for the last two reviews provide the date the review was conducted, a copy of the report, and a description of any action taken as a result of the findings.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>18. Does the licensee/registrant have a written information security program to protect consumer information? If yes, provide the following:</p> <ul style="list-style-type: none"> <li>• A copy of the program.</li> <li>• Date of last risk assessment.</li> <li>• A description of the internal and external risks identified to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assesses the sufficiency of any safeguards in place to control these risks.</li> <li>• Date of last testing/monitoring.</li> <li>• A description of the testing/monitoring process.</li> <li>• Date of last program update.</li> <li>• Indicate the total number of consumers Licensee maintains customer information, as of the most recent year end. Customer information means any record containing nonpublic personal information about a customer, whether in paper, electronic, or other form, that is handled or maintained by or on behalf of you or your affiliates including records maintained by vendors.</li> <li>• Provide an explanation how licensee/registrant determined the total number of consumers.</li> <li>• List all methods customer information is maintained (i.e., paper documents, computer/laptop, server, USB flash drive, hard drive, cloud service).</li> <li>• Indicate how long customer information is maintained on each of the above methods, as applicable.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

<ul style="list-style-type: none"> <li>• Is customer information permanently deleted/purged from the above methods?             <ul style="list-style-type: none"> <li>○ If yes, provide a description of current disposal policies or procedures.</li> <li>○ If yes, is the deletion/purge scheduled?</li> <li>○ How often is customer information deleted/purged?</li> <li>○ Provide record of the most recent date customer information was deleted/purged.</li> </ul> </li> </ul>	
<p>19. Does the licensee/registrant have a policy or procedure related to a notification of address discrepancy on a credit report? If yes, provide a copy.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>20. Does the licensee/registrant have a written Anti-Money Laundering program? If yes, please provide the following:</p> <ul style="list-style-type: none"> <li>• A copy of the program.</li> <li>• Date of last employee training.</li> <li>• Evidence of completed training.</li> <li>• Date of last independent testing.</li> <li>• Evidence of completed testing.</li> <li>• Date of last program update.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>21. Does the licensee/registrant have a written Identity Theft Prevention Program? If yes, please provide the following:</p> <ul style="list-style-type: none"> <li>• A copy of the program.</li> <li>• Date and documentation of approval of the initial written program from either board of directors or committee of the board.</li> <li>• Date of last employee training.</li> <li>• Evidence of last completed staff training.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>22. Does the licensee/registrant maintain copies of all creditor/broker compensation agreements?</p> <ul style="list-style-type: none"> <li>• If yes, provide copies of all agreements relevant to Michigan mortgage loans for the last 12 months.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>23. Does the licensee/registrant have written compensation agreements with its loan originators that are employees/agents, including branch managers?</p> <ul style="list-style-type: none"> <li>• If yes, provide copies of all agreements relevant to Michigan mortgage loans for the last 12 months.</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No

<p>24. Does the licensee/registrant have any contracts for services such as processing, underwriting, closing, quality control, tax services, or disposal services?</p> <ul style="list-style-type: none"> <li>If yes, provide copies of the contract(s) covering the last 12 months.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>25. Does the licensee/registrant use, or have contracts with, any collection agencies?</p> <ul style="list-style-type: none"> <li>If yes, provide a list of services performed, and/or copies of contracts.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>26. Does the licensee/registrant have any employees who have operated under the Temporary Authority to Operate (TAO)?</p> <ul style="list-style-type: none"> <li>If yes, provide a list with the employee's name, NMLS ID#, and employment start date.</li> </ul>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>27. State the licensee's/registrant's fiscal year-end (month and day):</p> <p>_____</p>	

**Provide the following:**

28. A list of all the licensee/registrant's bank accounts for the last 12 months. Include account numbers and describe what each account is used for.
29. For all bank accounts, provide statements for the last 6 months and corresponding reconciliations.
30. For each bank account in which escrow funds are maintained, also provide the escrow liability at the end of the period for each individual related servicing account.
31. The check registers or ledgers for 6 months on all bank accounts.
32. Statements for any credit cards used to pay corporate expenses for the last 6 months.
33. The most recent general ledger trial balance, balance sheet, and income statement for the licensee/registrant.
34. Payroll records, including transaction-specific compensation detail for the loans identified by the examiner for review.
35. A list, preferably in Excel, of all Michigan mortgage loan applications received in the last 24 months. Include the following fields:
  - a. Loan originator name
  - b. Loan originator NMLSR ID#

- c. Processor name (individual)
  - d. Processing entity (if applicable)
  - e. Loan number
  - f. Applicant first name
  - g. Applicant last name
  - h. Application date
  - i. Date closed (if applicable)
  - j. Status of application (closed, withdrawn, denied, in process, or rescinded)
  - k. Property address (including street address and city)
  - l. Property type (primary residence, secondary residence, investment)
  - m. Loan amount
  - n. Rate type (fixed, adjustable)
  - o. High cost or higher-priced loan (if applicable)
  - p. Lien position (first, second)
  - q. Loan purpose (purchase, refinance, reverse, reverse purchase)
  - r. Loan program (conventional, FHA, VA, HELOC, etc.)
  - s. Branch office (if applicable)
  - t. Lender of record, the entity to whom the note was initially payable
  - u. Funder (if different than lender of record)
  - v. Broker of record (if loan was brokered to lender)
  - w. Compensation source (lender paid/borrower paid)
  - x. For reverse mortgage origination, also include the following:
    - Principal limit
    - FHA case # assigned date
    - Product type (HECM Saver, HECM Standard, Proprietary)
    - Repairs after closing (Y/N)
36. A list of all lenders or investors to which Michigan mortgage loans were brokered or sold in the last 24 months. Identify which companies close the loans under their name.
37. A list of all reverse mortgage counselors the licensee/registrant conducts business with.
38. A list of all current and past employees/agents (including branch office managers and employees/agents) for the last 24 months, including job titles, date hired, date terminated, and the reason for leaving.
39. A job description for each job classification.
40. Copies of all W-2 and 1099 statements issued during the last two years.
41. Copies of all policies and procedures established, including but not limited to:
- a. Mortgage loan origination (i.e., processing, underwriting, closing, post-closing)
  - b. Mortgage loan servicing (i.e., loan boarding, payment processing, escrow administration, loss mitigation, customer service)
  - c. Marketing/Advertising

- d. Fees charged
- e. Quality control
- f. Compliance Management System
- g. Oversight of sub-servicers

42. A list of licensee/registrant's officers, directors, and shareholders, if a corporation; members, if a limited liability company; or partners, if a partnership. Include percentage of ownership.
43. Copies of corporate records, board minutes, corporate resolutions, etc. (or equivalent if other form of entity) for the past 24 months.
44. Copies of all advertising the licensee/registrant has done in Michigan within the last 12 months. If applicable, provide copies of all marketing materials for forward and reverse mortgage loans, including but not limited to, print materials (print ads, brochures, direct mailings, flyers, etc.); radio or television transcripts; telemarketing scripts; internet screen shots; email solicitations; social media site ads; and any instructions on oral solicitations by sales staff. Include the date and venue for publication or use of each item. If employees/agents personally advertised loan origination services related to Michigan mortgage loans, provide copies of those advertisements.
45. All the licensee/registrant's website addresses and social media sites. Include specific social media sites operated by the licensee/registrant, as well as those operated by employees/agents.
46. Flow charts of all processes related to servicing, if available.
47. A list of all investors for which the licensee/registrant has serviced Michigan mortgage loans during the last two years. Also, provide copies of the servicing agreements.
48. A list of codes utilized in the servicing platform along with the corresponding descriptions.
49. A list of screens utilized in the servicing platform along with the corresponding descriptions.
50. A list of fees assessed in connection with the servicing of Michigan mortgage loans, such as insufficient funds, attorney fees, delinquency charges, or other corporate advances.
51. Indicate office hours for the licensee/registrant and days the office is open, including Saturdays, if applicable. If open on Saturdays, does the licensee/registrant carry on substantially all its business functions?
52. Describe how the licensee/registrant complies with The Electronic Signatures in Global and National Commerce Act (E-SIGN Act). Provide all applicable policies and procedures.

53. Please provide a written description of the licensee/registrant's diversity, equity, and inclusion policy and initiatives.
- a. Does the licensee/registrant have a formally documented diversity, equity, and inclusion policy? If yes, who developed the policy and when?
  - b. Is the policy reviewed and approved by the board of directors? If no board of directors, who reviews and approves the policy?
  - c. How is the policy taken into consideration when interviewing candidates for open positions?
  - d. How is the policy communicated to personnel throughout the organization?

**I certify that all information, provided in response to this questionnaire, is true and correct to the best of my knowledge.**

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Signature Title Date

Printed Name Printed Title

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Name of Licensee/Registrant