

Completing the Anti Steering Disclosure

In an effort to help our brokers understand the Anti Steering requirements, the attached information provided may be used as a guide when completing the disclosure.

This is not intended to be used as a substitute for legal advice or opinions. Our broker partners should consult their own legal and compliance teams to ensure all provisions outlined in the safe harbor requirements under Section 226.36 (e) (2) of Regulation Z are being met.

Requirements:	The Anti Steering Disclosure is unacceptable if....
<p>1. The Anti-Steering Disclosure must be signed by EACH borrower at least one business day prior to the date the note is signed.</p>	<ul style="list-style-type: none"> • ...only one borrower signs and there is more than one borrower on the loan. • ... any borrower’s signature is dated on the same date the note is intended to be signed. • ...any borrower’s signature is not a full business (not calendar) day prior to the signature date.
<p>2. The Anti-Steering Disclosure must contain a minimum of three written loan options.</p>	<ul style="list-style-type: none"> • ... the Anti-Steering Disclosure contains less than three options. • ... the document contains N/A or blanks in any one of the three loan options.
<p>3. The loan options presented must be logical, complete, and accurate.</p>	<ul style="list-style-type: none"> • ...the <i>lowest interest rate</i> option is not actually reflecting the lowest interest rate of all offers presented. (The <i>Lowest interest rate without risky features</i> option and the <i>Lowest Cost</i> option cannot reflect a <u>lower</u> interest rate than the <i>lowest rate</i> option). • ...the <i>lowest points and fees</i> option (3) is not actually reflecting the lowest points and fees of the three offers presented. • ...the loan terms presented for EITHER the <i>lowest rate</i> option OR the <i>lowest rate without risky features option</i> are the same as the loan terms presented for the <i>lowest points and fees</i> option. (Note that we will consider scenarios where the <i>lowest rate option</i> & the <i>lowest rate without risky features</i> option are the same loan terms on a case by case basis.) • ...the same loan terms are listed for all three loan options.

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Anti-Steering/Loan Options Disclosure

Broker Company Name: _____

Borrower(s): _____

Property Address: _____

Complete information on top of form.

Boxes 1 thru 8 must be filled out, no blanks or "N/A". Interest rate in box 1,2,3,4 must be a positive #.

"Type of Transaction" must be selected & remain consistent with the final loan terms.

Dear Borrower,

You have applied for a mortgage loan with our company. To ensure you have sufficient information to determine the appropriate loan, we are providing you with the following loan options. These loan options provide you with detailed rate and loan cost information to assist you in choosing the correct loan for your particular financial situation. Carefully review the loan options presented below to ensure you have chosen the appropriate option.

Your Loan Options. For each type of transaction in which you expressed an interest, we have obtained loan options from a significant number of the creditors with whom we regularly conduct business. We have a good faith belief that you likely qualify for the following loans:

Boxes 5 -- 8 are a net calc of lender fees AND either the lender credit due to buy--up, or discount points due to buy--down, whichever applies. LPC is not part of the calculation. Negative costs due to a credit are to be indicated by either "()" or "{ }". A negative sign, i.e. "-" will only be accepted if it is clear and legible.

Option 1 must reflect the lowest rate of the three options presented.

Type of Transaction (check one)		Interest Rate	Total origination points or fees and discount points
<input type="checkbox"/> Fixed Rate			
<input type="checkbox"/> Adjustable Rate			
Option 1	Loan with the lowest Interest Rate	1 %	5 \$
Option 2	Loan with the lowest Interest Rate without negative amortization, a prepayment penalty, interest-only payments, a balloon payment in the first 7 years of the life of the loan, a demand feature, shared equity, or shared appreciation	2 %	6 \$
Option 3	Loan with the lowest total dollar amount for origination points or fees and discount points	3 %	7 \$
You are applying for a loan with the following terms		4 %	8 \$

Option 3 must reflect the lowest points and fees of the three options presented.

If you expressed an interest in an adjustable rate loan and if the loan's initial rate is fixed for at least 5 years, the "Interest Rate" disclosed in this document is the initial rate that would be in effect at consummation. If the loan's initial rate is not fixed for at least 5 years, the Interest Rate is the fully-indexed rate that would be in effect at consummation without regard to any initial discount or premium.

This is not a lock-in agreement or a loan commitment. The interest rate and fees described throughout this disclosure are available on the date the document was prepared and they may be subject to change if you have not locked in your interest rate. If your lender offers rate locks you may be required to lock the rate to obtain the rate and origination cost disclosed above. Additionally, even if your loan is locked, the Interest Rate and fees may be subject to change as the loan is underwritten.

Box 4 & 8 must reflect the loan terms for which the borrower applied. This may be different from the final loan terms.

If your lender does offer rate locks and you have not locked your loan, please be aware that interest rates move constantly. The way to set a certain Interest Rate and fees is for you to request that your loan be locked. Once you lock your loan, you are agreeing to close your loan within a certain period of time and at a certain interest rate. If you instruct us to lock your loan, we can explain to you the Interest Rate and fees you will pay.

Each borrower must sign and date the disclosure. Borrower name & dates must be completed; signature must be wet signed or eSigned; typed signature will be rejected.

Be sure that you understand and are satisfied with the product and terms that have been offered to you.

Signed:

Broker Loan Officer Name _____ Broker Loan Officer Signature _____ Date _____

Broker Entity Name _____ Broker Entity Address & License Number _____

Borrower Name _____ Borrower Signature _____ Date _____

Borrower Name _____ Borrower Signature _____ Date _____

Borrower Name _____ Borrower Signature _____ Date _____

The broker signature must be wet signed or eSigned; typed signature will be rejected.

The date signed must be at least one business day prior to the date the note is signed for both escrow & non escrow states.