

# COMPLIANCE & LEGAL TEAM



20  
19





Compliance Team

WHAT'S NEW? >



Compliant Marketing and Advertising



Vendor Request



Appraisal Desk

**MEET THE TEAM**



Send by email

Published 4/8/2019

## Compliance Management Team



**Jeff Goshert**  
Chief Compliance Officer



**Tony Villarreal**  
Vice President Compliance



**Christopher Baker**  
General Legal Counsel



**Scott Isaacs**  
Compliance Manager - Quality Contr...



**Jason Kuzma**  
Appraisal Desk Team Lead



**Gennifer Lee**  
Compliance Manager



**Melissa Dyson**  
Assistant Compliance Manager II



**Melissa Wollenberg**  
Assistant Compliance Manager

## Compliance Team



**Joseph Laing**  
Appraisal Desk Support



**Cole Goshert**  
Compliance Support



**Yusef Idris**  
Customer Solutions Specialist



**Benjamin Anderson**  
Vendor Management Analyst



**Sami Elhaydouni**  
Customer Solutions Specialist



**Lence Kline**  
Compliance Support



**Leeann Marshall**  
Legal Analyst



**Marlo Blackman**  
Customer Solutions Specialist



**Alexander Engelke**  
Customer Solutions Specialist



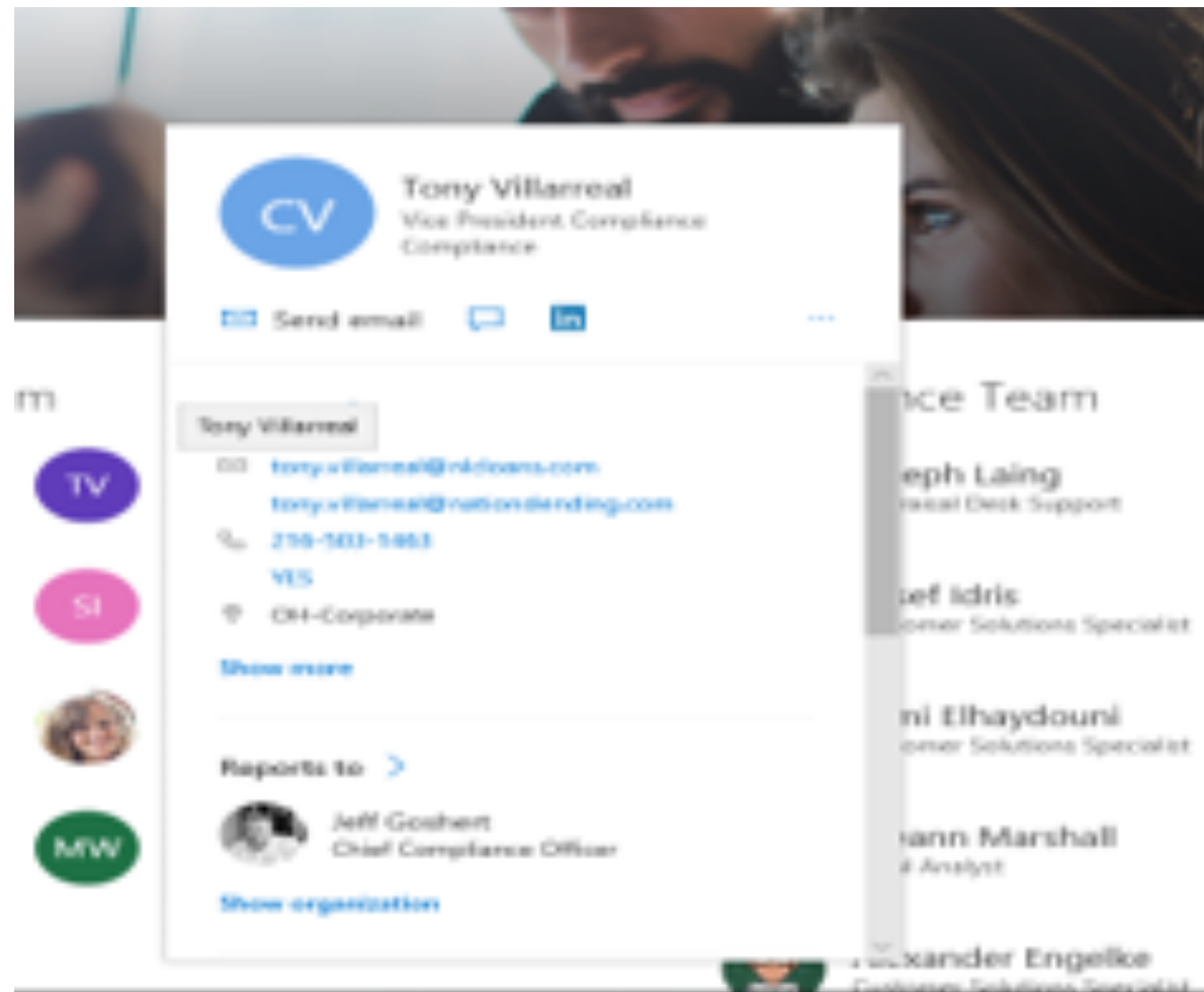
**Keila Colon-Rodriguez**  
Administrative Assistant



**Shirley Pope**  
Customer Solutions Specialist

# EASILY CONNECT WITH ANYONE IN THE DEPT.

## Vice President Compliance



## Appraisal Desk Team Lead



Jason Kuzma

Appraisal Desk Team Lead • Compliance

Send email Start chat

Contact About Organization Files LinkedIn

### Contact information

Add to contacts

Email  
jason.kuzma@nationslending.com

Work phone  
216-503-0713

Office location  
OH-Corporate

Chat  
jason.kuzma@nationslending.com

Company  
OH-Corporate

Job title  
Appraisal Desk Team Lead

Department  
Compliance

### Manager



Tony Villarreal  
Vice President Compliance

# CUSTOMER SOLUTIONS

The behind the scene team to help you.

# SOLUTIONS TEAM

- Melissa Dyson / Asst. Compliance Mgr.
- Sami Elhaydouni / Customer Solutions Specialist
- Marlo Blackman / Customer Solutions Specialist
- Yusef Idris / Customer Solutions Specialist
- Shirley Pope / Customer Solutions Specialist

- Assist with Ellie Mae disclosures and e-signing processes
- Answer calls inbound from Nations Lending 800#
- Monitor and assist with Social Survey
- Initial intake of customer concerns
- Assist branch employees with compliance questions and tracking of deadlines for disclosures

# POLICIES & PROCEDURES

Answers to some of your questions.



+ New ▾

⚙ Page details

## Policies and Procedures

[LEARN MORE >](#)

20  
19

  
nations  
lending















## Policies














Home Documents Pages Compliance Bookshelf Site contents Edit

+ New  Page details

### Documents

 Open  Share  Copy link  Download  Delete  Pin to top  Rename 

 1 selected  All Documents

 Name 	Modified 	Modified By 
 Branch Operations	April 13, 2018	Gennifer Lee
 Human Resources	March 26, 2018	Christopher Baker
<input checked="" type="checkbox"/>  Anti-Money Laundering and SA...  	August 22, 2018	Gennifer Lee
 Appraisal Independent Review Policy 20180...	March 26, 2018	Christopher Baker
 Branch Referral Incentive Policy 2.0 April 20...	5 days ago	Gennifer Lee
 Compensation Change Policy 3.1.pdf	May 21, 2018	Gennifer Lee
 Employee Incentive Promotion and Contest...	May 21, 2018	Gennifer Lee

# ADVERTISING

How to get your ads approved quickly

Marketing and Advertising

Site contents

Bookshelf



# Advertising Approval Process

## Scroll down on the loop advertising page

Compliance



Compliance

★ Following

Home Loop Documents Pages Compliance Sites Vendor Request Link Marketing and Advertising Site contents Bookshelf

Send by email Promote Page details

Published 10/18/2018 Edit

 advertisingrequest@nati...  
advertisingrequest@nationslending.c...

### APPROVAL PROCEDURES

#### Forms

Before introducing an advertisement, brochure, statement insert, or any marketing related item, the branch or employee should present the ad, the appropriate and completed review checklist, and the **Advertising Approval Request Form** to the Advertising and Marketing Compliance Manager for review and approval. **This form must be filled out completely or the process can be delayed.** See the sample below and the folder to download the form to your computer this will make the form fillable.

Open the folder below to download the fillable Advertising Approval Request Form.

[See all](#)

Sync Export to Excel

All Documents

Name	Modified	Modified By
Marketing and Advertising	January 3, 2018	Tony Villarreal

# ADVERTISING APPROVAL PROCESS

The Company implements the following procedures for advertisement approvals:

1. If applicable, Vendor must be approved through the Vendor Management department prior to advertising approval request submittal. All new vendors must be approved through compliance before any agreements or contracts can be executed.
2. Employee submits the completed Advertising Approval Request Form (Approval Request Form) to the Chief Compliance Officer (CCO) or designated compliance employee along with a copy of the proposed advertisement.



Submitted By: \_\_\_\_\_ (Employee Name) Branch Location: \_\_\_\_\_

Date: \_\_\_\_\_ Fax Number or Email Address: \_\_\_\_\_ # Pages \_\_ (If Faxed)

Advertisement for: \_\_\_\_\_  
(LOAN PRODUCT NAME / PROMOTION / PROJECT NAME)

Type of Media:

<input type="checkbox"/> Newspaper	<input type="checkbox"/> Signage
<input type="checkbox"/> Brochures	<input type="checkbox"/> Email
<input type="checkbox"/> Leaflets/Flyers	<input type="checkbox"/> Direct Mail
<input type="checkbox"/> Lobby Board	<input type="checkbox"/> Statement Insert
<input type="checkbox"/> Television	<input type="checkbox"/> Counter Cards
<input type="checkbox"/> Telephone Solicitation	<input type="checkbox"/> Electronic Board
<input type="checkbox"/> Internet	<input type="checkbox"/> Radio
<input type="checkbox"/> Billboard	<input type="checkbox"/> Other Outdoor Media
<input type="checkbox"/> Other: _____	

Run Dates: \_\_\_\_\_ to \_\_\_\_\_ Repeat Dates: \_\_\_\_\_ to \_\_\_\_\_

Example Attached?	In Final Form?	New Advertisement?
<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Audience: \_\_\_\_\_  
(State / Demographic)

	Approved	Approved w/ Changes Noted (*)	Not Approved	Date	Signature
Initial Approval Required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

	Approved	Approved w/ Changes Noted (*)	Not Approved	Date	Signature
Final Approval Required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

\* Comments / Changes Required:  
\_\_\_\_\_  
\_\_\_\_\_

CONFIDENTIAL DOCUMENT

Advertising Manual Update: 9/24/13.  
Nations Lending Corporation must give prior written permission for this work, or any part thereof, to be used, reproduced, or transmitted in any form or by any means, by or to any party outside Nations Lending Corporation its regulators and investors.

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# ADVERTISING APPROVAL FORM



ADVERTISING APPROVAL REQUEST FORM

Submitted By: \_\_\_\_\_ (Employee Name) Branch Location: \_\_\_\_\_

Date: \_\_\_\_\_ Fax Number or Email Address: \_\_\_\_\_ # Pages \_\_ (If Faxed)

Advertisement for: \_\_\_\_\_  
(LOAN PRODUCT NAME / PROMOTION / PROJECT NAME)

Type of Media:

<input type="checkbox"/> Newspaper	<input type="checkbox"/> Signage
<input type="checkbox"/> Brochures	<input type="checkbox"/> Email
<input type="checkbox"/> Leaflets/Flyers	<input type="checkbox"/> Direct Mail
<input type="checkbox"/> Lobby Board	<input type="checkbox"/> Statement Insert
<input type="checkbox"/> Television	<input type="checkbox"/> Counter Cards
<input type="checkbox"/> Telephone Solicitation	<input type="checkbox"/> Electronic Board
<input type="checkbox"/> Internet	<input type="checkbox"/> Radio
<input type="checkbox"/> Billboard	<input type="checkbox"/> Other Outdoor Media
<input type="checkbox"/> Other: _____	

Run Dates:  to  Repeat Dates:  to

Example Attached?

Yes  No

In Final Form?

Yes  No

New Advertisement?

Yes  No

Audience:

(State / Demographic)

	Approved	Approved w/ Changes Noted (*)	Not Approved	Date	Signature
Initial Approval Required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>

	Approved	Approved w/ Changes Noted (*)	Not Approved	Date	Signature
Final Approval Required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>	<input type="text"/>

\* Comments / Changes Required:



**3. The CCO or designated compliance employee adds the proposed advertisement to the Advertising Log and reviews the Approval Request Form, assigns it a name, and further reviews the proposed advertisement by using this Advertising Manual's checklists or any regulatory guides, information, or documentation that may be used to evaluate advertising compliance.**

**4. The CCO or designated compliance employee will review the compliance requirements of the advertisement or related marketing item. The completed Approval Request Form and Proposed advertisement may also be subject to a third-party regulatory compliance review, such as through risk management review or regulatory compliance counsel. A reply from the Advertising and Marketing Compliance Officer may take up to 24 hours.**

**5. After completing the review, the CCO or designated compliance employee will submit the advertisement back to the requesting employee with the changes required for approval.**

**6. The requesting employee will make any corrections deemed necessary by the CCO or designated compliance employee and resubmit for additional review and final approval if all requested revisions have been made.**

**7. Final approval shall be documented on the Approval Request Form and may take up to 24 hours from the time submitted for final approval.**

**8. Upon approval of the advertisement, the signed approval request, and the advertisement template, and supporting documentation relating to the subject advertisement will be kept in a secure environment and recorded in the Advertising Log as well as a final version of the approval.**

# FRAUD


The videos

# COMPLIANCE MESSAGE WITH A TWIST



## Compliance

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 Search across site



### Compliance Video Series

5 videos | 2 followers



 [Microsoft Stream](#)




Employee Loan Style! 01:23

#### Employee Loans

An important message from Jeff Goshert about the company Employee Loan Policy.

239  79 






**OWNER OCCUPANCY**  
Refinance Transactions  
**LOOK OUT FOR!!!**

- Rental property listed on application is more expensive than subject property
- Different mailing address on applicant's bank statements, pay advice, etc.
- Different address reported on credit report
- Significant or unusual commode distance
- Appraisal reflects vacant or tenant occupancy
- Occupancy effectively reflects applicant does not intend to occupy
- Homeowner's insurance is a rental policy (declarations page)
- Reverse directory does not disclose subject property address.

02:28

#### Avoiding Fraud



192  26 




**THE HR OFFICE**

03:02



#### The HR Office - The Request


217  45 



01:33



#### Fraud video 2-NLC Employee Reporting

201  4 



06:13

#### Fraud - No Short Cuts\_Medi... Mortgage Fraud WILL be halted by the Compliance Ninja!

276  96 

<https://web.microsoftstream.com/video/ed48ec86-d7ef-4c3c-97ee-8f3c6e4cb533>

<https://web.microsoftstream.com/video/c2adb610-1f3e-40bd-a8b9-1f8dfa240327>