

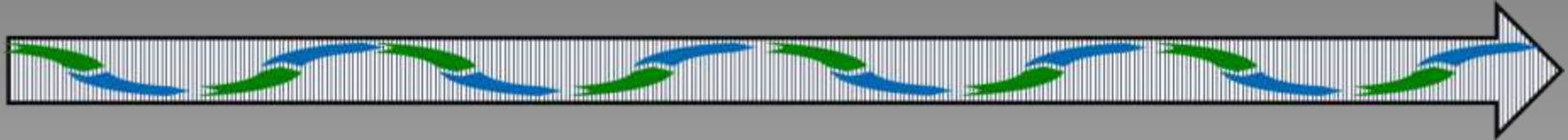


AKLERO

Loan Quality Analytics

Aklero Risk Analytics, Inc.
185 Commerce Drive, Suite 2
Fort Washington, PA 19034
215-367-5500

The Loan Continuum



Pre-Underwriting

Pre-Closing

**Post-Closing
Pre-Shipping**

Post-Closing QC

Loan Servicing

Dodd-Frank

FNMA

Increased Investor
Scrutiny

Sampling

MERS Requirements

Suitability

FHLMC

Timing

LO Comp

New Investor
Requirements

Funding Delays

Reporting

Inter Agency
Guidance on ALL

Loan Quality

Warehouse Velocity

Continuous
Improvement

Consequences of Non-Compliance

Increased Repurchase Demands

Fines & Penalties

Reputation Risk

Increased Capital Requirements / Loan Loss Reserves

Technology: a Necessity in the New Age of QA -QC

Time Sensitive

Quality Audit Results Must Be Produced Quickly



Within 24 Hours:

- Pre-Closing Audits
- Post Closing – Pre-Shipping

On a Daily Flow:

- Sampled Closed Loan Audits Should be Available on a Flow Basis (as opposed to 60 days)

Data Analytics & Business Intelligence

Reporting Must Be:



- On-Demand Real Time
- Show Results by Actor in the Loan Process
 - ✓ Branches
 - ✓ Loan Officers
 - ✓ Underwriters
 - ✓ Processors
 - ✓ Third Parties (Title Agencies, Appraisers, etc.)
- Trending & Benchmarking
- Actionable

Productivity

Quality can Have an Return on Investment

- Increasing Loans Per Person Per Day
- All Data, Docs and Details Associated with Audit on One Unified Platform
- Ability to See all Communication Between Parties Involved in an Audit (i.e. Rebuttals, Remediation, etc.)
- Executive Management Reporting Should Take Minutes Not Hours, Days or Weeks



Granularity of Audit

Data and Documents are the Key

- Data Integrity Check – Compare Doc Data to Data in Systems
- Document Validation Check
 - ✓ Existence of Documents
 - ✓ Document Content Validation
 - ✓ Execution of Document
- Forgery & Fraud Check – Clipping of Signatures
- Document Data to Document Data Validation





Aklero Named
“10X Award Winner”
Mortgage Technology Magazine



CEO named a 2012
“TECH All Star”
Mortgage Bankers Magazine



Aklero Named
“Exclusive QC Provider”
Business Solutions,
ABA Subsidiary



Aklero Named as a
“Top Service Provider”
Mortgage Technology
Magazine
2011 & 2012



Loan Quality Management Platform



MERS

Intelligent Document
Management
(Doc & Data Validation)



“Clear To Close”
Pre Closing
Audit
(Automated)



Post Close
Audit
Delivery
Module

Pre Funding
Audit



Quality
Control
Audit



Due Diligence
Bulk Trade
Audit



Business Intelligence, Benchmarking and Trending Module

Pre-Closing Requirements: GSE's

Pre-Closing



- ✓ Pre-Closing Audit
 - Adequate Time to Select Loans
 - Provide Feedback to Origination Staff
 - Monitor Origination Policies
 - Ensure the Accuracy of Loan Data
 - Allow Time for Corrections/Revisions
- ✓ Sampling Guidelines:
 - LTV > 90%
 - Credit Scores in High Risk Range
 - Loans Secured by Investment Properties
 - Cash Out Refinances
- ✓ Validate and Verify
 - AUS Data
 - SSN
 - Income Calculations & Support Docs
 - Employment – VVOE
 - Closing Assets/Property Valuation Data
 - Proof of Mortgage Insurance Coverage
- ✓ Method for Retaining Project Documentation



- ✓ Pre-Closing/Post-Closing Audit
 - Verify Existence and Accuracy of Files
 - Evaluate Underwriting Decisions
 - Determine where Additional Training is Needed
 - Discover E&O and Intentional Violations
 - Identify Process & Procedural Changes
 - Conform to Underwriting, Insurer & Investor Requirements
 - Determine if Regulatory Requirements are met
 - Determine if Freddie Mac Requirements are met
 - Monitor OVERALL Quality of Mortgage Production

How it Works: Receipt of Images and Data

Paper Documents

Scan and Upload
DQx Scan



Digital Images



Upload (PNG, PDF, JPG, TIFF)
Integrated/Delivery Options:
SFTP, Web Services, Native DMS

1 0 1 0 1 1 1 0
0 1 1 0 1 0 0 1
0 0 1 1 0 0 1 0
0 1 0 1 1 1 0 1

Source Data Received

Bid/Servicing Tapes, MISMO DTD, Excel,
XML, CSV

How It Works

Images are Classified and Data is Extracted
via our Document Automation Process

Uniform Residential Loan Application

This application is designed to be completed by the applicant(s) with the Lender's assistance. Applicants should complete this form as "Borrower" or "Co-Borrower", as applicable. Co-Borrower information must also be provided (and the appropriate box checked) when the income or assets of a person other than the Borrower (including the Borrower's spouse) will be used as a basis for loan qualification or the income or assets of the Borrower's spouse or other person who has community property rights pursuant to state law will not be used as a basis for loan qualification, but his or her liabilities must be considered because the spouse or other person has community property rights pursuant to applicable law and Borrower resides in a community property state, the security property is located in a community property state, or the Borrower is relying on other property located in a community property state as a basis for repayment of the loan.

If this is an application for joint credit, Borrower and Co-Borrower each agree that we intend to apply for joint credit (sign below):

Holly McCann
Borrower
BOLLY MC CANN

Co-Borrower

I. TYPE OF MORTGAGE AND TERMS OF LOAN

Mortgage Applied for:	<input type="checkbox"/> VA <input type="checkbox"/> FHA	<input checked="" type="checkbox"/> Conventional <input type="checkbox"/> USDA/Rural Housing Service	<input type="checkbox"/> Other: (explain)	Agency Case Number	Lender Case Number
Amount	Interest Rate	No. of Months	Amortization Type:	<input checked="" type="checkbox"/> Fixed Rate <input type="checkbox"/> GPM	<input type="checkbox"/> Other (explain): <input type="checkbox"/> ARM (type):
\$83,600.00	4.500%	360 / 360			9005009766

II. PROPERTY INFORMATION AND PURPOSE OF LOAN

Subject Property Address (street, city, state & ZIP)					No. of Units
907 FAIRWAY PLACE, WARRINGTON, PA 18976					1
Legal Description of Subject Property (attach description if necessary)					Year Built
See Legal Description attached hereto and made a part hereof.					1987
Purpose of Loan			Property will be:		
<input type="checkbox"/> Purchase <input checked="" type="checkbox"/> Refinance <input type="checkbox"/> Construction <input type="checkbox"/> Construction-Permanent			<input checked="" type="checkbox"/> Primary Residence <input type="checkbox"/> Secondary Residence <input type="checkbox"/> Investment		
Complete this line if construction or construction-permanent loan.					
Year Lot Acquired	Original Cost	Amount Existing Liens	(a) Present Value of Lot	(b) Cost of Improvements	Total (a + b)
\$	\$	\$	\$	\$	\$
Complete this line if this is a refinance loan.					
Year Acquired	Original Cost	Amount Existing Liens	Purpose of Refinance	Describe Improvements <input type="checkbox"/> made <input type="checkbox"/> to be made	
2004	\$89,900.00	\$77,955.44	CASH OUT LIMITED	Cost:	
Title will be held in what Name(s)			Manner in which Title will be held	Estate will be held in:	
BOLLY MC CANN			JOINT TENANTS	<input checked="" type="checkbox"/> Fee Simple <input type="checkbox"/> Leasehold (show expiration date)	
Source of Down Payment, Settlement Charges, and/or Subordinate Financing (explain)					
EQUITY FROM SUBJECT PROPERTY					



Q-CLOSE™ Audit Rules Engine

Data is filtered by the Platform

```
Running: Auto Versioning Filter.....COMPLETE!
Running: Required Document Existence.....COMPLETE!
Running: Execution & Signature.....COMPLETE!
Running: Source Data to Document Comparison..COMPLETE!
Running: Document to Document Comparison.....COMPLETE!
```



Credit Report Order Number Does Not Match Underwriting Findings

Prepared by: EQUIFAX MORTGAGE SOLUTIONS
6 E. CLEMENTON RD
GIBBSBORO NJ 08026

Order No: 5EKKZ4
Ordered: 02/01/2011
Completed: 02/01/2011

Underwriting Findings

EQUIFAX
MORTGAGE
SERVICES

CPKFPO

01/06/2011

Intelligent Document Management

Search by Deficiencies
Issues are visible via easy, pop out windows

Ability to View Document and Data Deficiencies and Modify Accordingly

Select Export Type ▼

Client Name	Loan Number	Status	Files Processed	Action	Select All/ Deselect All
Exhibit	3000054796	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	0602971416	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	0602971365	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	1024051708	Deficient	Closing and Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	1007030859	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	Test209149	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	Test208672	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	Test209798	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	Test209004	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	Test201080	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>
Exhibit	InvestorQX3	Deficient	Credit	LOS Data E-Shipping	<input type="checkbox"/>

Closing Document Problems

Document	Deficiencies	Severity
Borrowers Certification and Authorization Letter	Signature Deficiency	
Compliance Agreement	Signature Deficiency	
ECOA Notice Application Disclosure	Missing Deficiency	LOW
Equal Credit Opportunity Act	Signature Deficiency	
HUD 1 Settlement Statement	Content Deficiency	
ID Single (UNKNOWN)	Content Deficiency	
Notice to Applicant of right to receive copy of appraisal report	Signature Deficiency	
Payment Letter	Content Deficiency Signature Deficiency	
Security Instrument	Missing Deficiency	HIGH
Servicing Disclosure Statement	Signature Deficiency	
Truth in Lending Disclosure Statement Final	Missing Deficiency	HIGH
W-9 (UNKNOWN)	Content Deficiency	


Credit Document Problems

Document	Deficiencies	Severity
4506T Joint	Content Deficiency	
Appraisal	Content Deficiency	LOW
Appraisal Acknowledgement	Signature Deficiency	
Good Faith Estimate Initial	Content Deficiency	
Hazard Insurance	Content Deficiency	
Note Final	Missing Deficiency	HIGH
Notice of Right to Cancel Single		

[Close](#)

QC WORK QUEUE

Signature Audit Screen

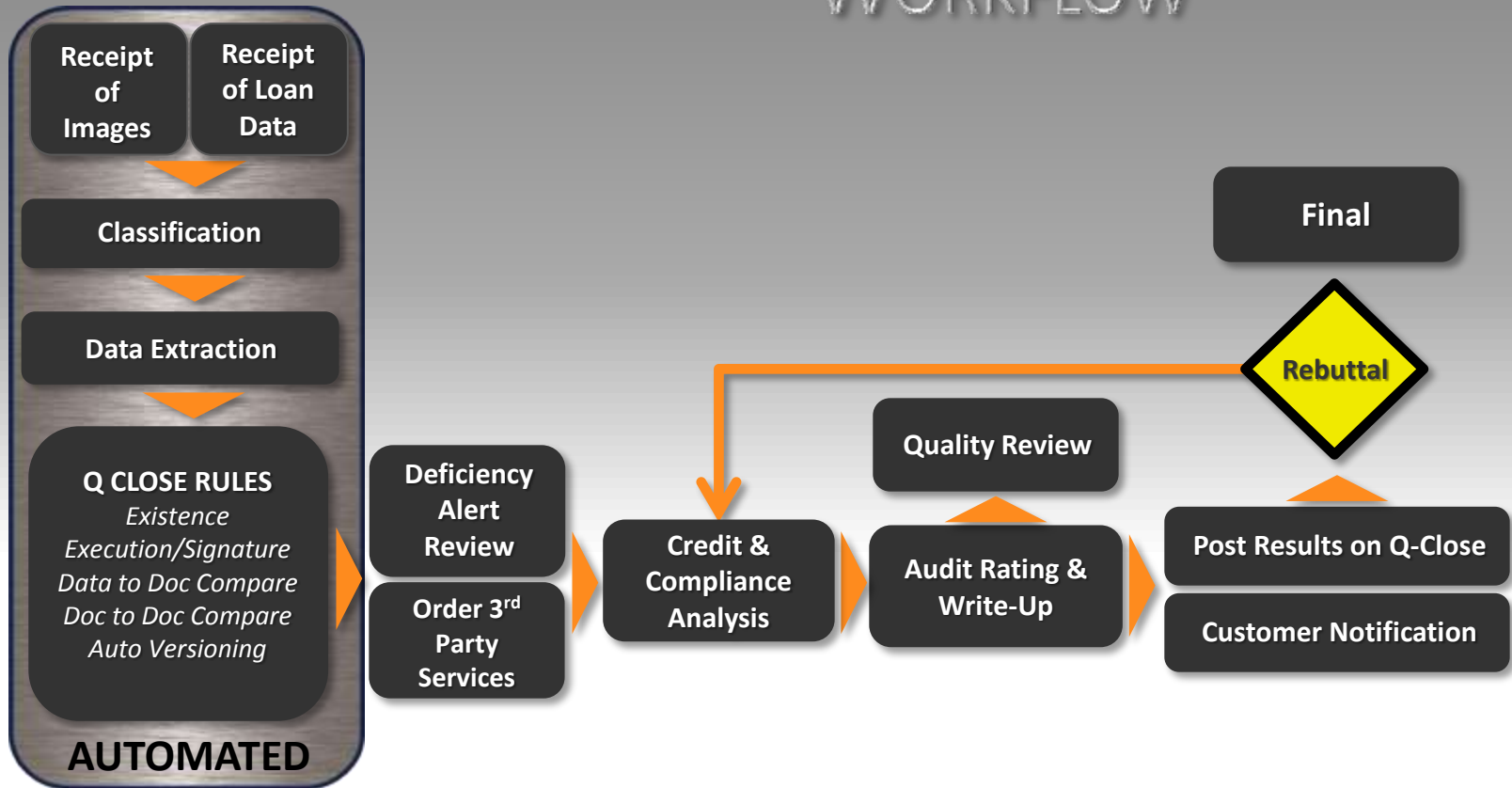
<p>Mortgage</p>  <p>(Seal) -Borrower</p>	<p>4</p>  <p>(see instructions)</p>
<p>Note</p>  <p>(Seal) Mark Smith</p>	<p>Contract of Sale</p>  <p>BUYER</p>
<p>Uniform Residential Loan Application INITIAL</p> <p>Borrower's Signature</p>  <p>X</p>	<p>Uniform Residential Loan Application FINAL</p> <p>Borrower's Signature</p>  <p>X</p>

Current ZIP Code: 91922 Current ZIP Code: 91922 Current ZIP Code: 91922

Ethnicity: [NOT HISPANIC OR LATINO] Ethnicity: [NOT HISPANIC OR LATINO] Ethnicity: [--select--]

Q-CLOSE™

WORKFLOW



AKLERO AUDITS

COMPETITIVE POSITIONING

	AKLERO	Adfitech	TENA	QMS	Stone Hill	Complyshare	BAI
Re-Underwrite	✓	✓	✓	✓	✓	✓	✓
Compliance Review	✓	✓	✓	✓	✓	✓	✓
Fraud Review	✓	✓	✓	✓	✓	✓	✓
Real-time Pipeline Visibility	✓	✗	✗	✗	✗	✗	✗
Segregated QC DMS Archive	✓	✗	✗	✗	✗	✗	✗
Source Data to Doc Validation	✓	✗	✗	✗	✗	✗	✗
Automated Configurable Rules Engine	✓	✗	✗	✗	✗	✗	✗
30 Day SLA	✓	✗	✗	✗	✗	✗	✗
Automated Rebuttal Tracking	✓	✗	✗	✗	✗	✗	✗
Integrated Business Intelligence Reporting	✓	✗	✗	✗	✗	✗	✗
Secure SaaS Platform	✓	✗	✗	✗	✗	✗	✗



Audit Checklist

Loan ID: 0000123459
Borrower: Johnson, Zoe
Date Complete: 2011-09-22

Pre-Closing Checklist Report



Initial Application	Pass	Income	Pass
Fully completed (2yr address and work history)	✓	Verbal VOE is dated within 10 days of closing	✓
Signed by MC and borrowers	✓	Paystub is dated within 30 days of application	✓
Loan Officer Signature is present	✓	Transcripts match docs in file and application	✓
Borrower signatures are all present	✓	OT, Bonus, Commission are averaged	✓
Co-Borrower signatures are all present	✓	Self employment analysis is present if applicable	N/A
Dated by MC and borrowers	✓	Complete tax returns for self employed borrowers	N/A
Loan Officer Signature is dated	✓		
Borrower signatures are all dated	✓		
Co-Borrower signatures are all dated	✓		
Good Faith Estimate	Fail	Assets	Fail
Initial is dated within 3 days of initial application	✓	Balances on docs match 1003/DU	✓
Points disclosed on GFE match HUD	✓	Large deposits sourced	✓
Within acceptable tolerance	✓	Complete 30 day history	✗
Service Provider List is present	✗	Sufficient funds for closing	✓
Changed Circumstance present for every change	✓	Reserves verified if needed	N/A
		Down payment verified if using	N/A
Truth in Lending	Pass	Appraisal	Pass
Initial is dated within 3 days of initial application	✓	Property Address matches LOS	✓
APR within .125% tolerance	✓	Appraised value matches LOS	✓
Initial to Final	✓	Seller matches AOS	✓
Intermediate to Final	N/A	Comps are sufficient	✓
Earliest closing date meet	✓	Appraiser's license is valid	✓
		Appraisal is signed	✓
		Final inspection is present, if needed	N/A
		Property flip	N/A
Disclosures	Pass	Mortgage Insurance	Pass
All Initial disclosures are present	✓	Sales price match 1008	✓
Arm disclosure if applicable	✓	Loan amount matches 1008	✓
		LTV matches 1008	✓
		Premium matches 1008	✓
Agreement of Sale	N/A	DU/IP Findings	Pass
Address matches LOS	N/A	Address matches Loan Summary	✓
Sales price matches LOS	N/A	Income matches Loan Summary	✓
Signed by seller/borrower	N/A	Assets match Loan Summary	✓
Seller Signature is present	N/A	Credit report number matches Loan Summary	✓
Purchaser Signature is present	N/A	Ratio match Loan Summary	✓
Seller assist matches LOS	N/A	Front Ratio	✓
Addendum's signed by all parties	N/A	Back Ratio	✓
Seller Signature is present	N/A	LTV matches Loan Summary	✓
Purchaser Signature is present	N/A	Loan program matches Loan Summary	✓
		DU version 8.0	✓
Credit	Pass	Approval	Pass
Name, address, and SSNs match other docs in file	✓	Conditions cleared	✓
Borrower name matches LOS	✓	DTI acceptable for investor	✓
Co-Borrower name matches LOS	N/A	Investor specific conditions	✓
Borrower SSN matches LOS	✓	\$2500 signed by underwriter	✓
Co-Borrower SSN matches LOS	N/A		
Address matches Final 1003	✓	Hazard Insurance	Pass
Credit inquiries are explained	✓	Borrowers name on policy	✓
Adverse credit is explained	✓	Effective at time of review	✓
TruAlert/Facta conditions have been received	✓	Sufficient coverage	✓
Date and FICD's are still acceptable	✓	Mortgagee correct	✓
Credit score matches rate confirmation	✓		
LDP/GSA checked for all parties	✓	Condos	N/A
Borrower	✓	CPM decision validated	N/A
Co-Borrower	N/A	Correct property type on AUS/1008	N/A
		Personal Property Insurance is present	N/A
Flood Certificate	Pass		
Property Address matches 1008	✓		
Signed Notice to Borrower is present, if applicable	N/A		
Flood insurance is present, if applicable	N/A		



Audit Checklist

Loan ID: 0000123459
Borrower: Johnson, Zoe
Date Complete: 2011-09-22

Pre-Closing Checklist Report



Category	Item	Status
Initial Application	Fully completed (2yr address and work history)	Pass
	Signed by MC and borrowers	✓
	Loan Officer Signature is present	✓
	Borrower signatures are all present	✓
	Co-Borrower signatures are all present	✓
	Dated by MC and borrowers	✓
	Loan Officer Signature is dated	✓
	Borrower signatures are all dated	✓
	Co-Borrower signatures are all dated	✓
	Good Faith Estimate	Initial is dated within 3 days of initial application
Points disclosed on GFE match HUD		✓
Within acceptable tolerance		✓
Service Provider List is present		✗
Changed Circumstance present for every change		✓
Truth in Lending	Initial is dated within 3 days of initial application	Pass
Income	Verbal VOE is dated within 10 days of closing	Pass
	Paystub is dated within 30 days of application	✓
	Transcripts match docs in file and application	✓
	OT, Bonus, Commission are averaged	✓
	Self employment analysis is present if applicable	N/A
	Complete tax returns for self employed borrowers	N/A
	Assets	Balances on docs match 1003/DU
Large deposits sourced		✓
Complete 30 day history		✗
Sufficient funds for closing		✓
Reserves verified if needed		N/A
Down payment verified if using	N/A	
Appraisal	Property Address matches LOS	Pass
	Appraised value matches LOS	✓
	Seller matches AOS	✓

Appraisal

Pass

Property Address matches LOS



Appraised value matches LOS



Seller matches AOS



Comps are sufficient



Appraiser's license is valid



Appraisal is signed



Final Inspection is present, if needed

N/A

Property flip

N/A

Co-Borrower N/A

Category	Item	Status
Flood Certificate	Property Address matches 1008	Pass
	Signed Notice to Borrower is present, if applicable	N/A
	Flood insurance is present, if applicable	N/A

Mortgagee correct

Category	Item	Status
Condos	CPM decision validated	N/A
	Correct property type on AUS/1008	N/A
	Personal Property Insurance is present	N/A



Audit Checklist

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Signed by MC and borrowers	✓	Paystub is dated within 30 days of application	✓
Loan Officer Signature is present	✓	Transcripts match docs in file and application	✓
Borrower signatures are all present	✓	OT, Bonus, Commission are averaged	✓
Co-Borrower signatures are all present	✓	Self employment analysis is present if applicable	N/A
Dated by MC and borrowers	✓	Complete tax returns for self employed borrowers	N/A

Credit

Pass

Name, address, and SSNs match other docs in file ✓

Borrower name matches LOS ✓

Co-Borrower name matches LOS N/A

Borrower SSN matches LOS ✓

Co-Borrower SSN matches LOS N/A

Address matches final 1003 ✓

Credit inquiries are explained ✓

Adverse credit is explained ✓

TruAlert/Facta conditions have been received ✓

Date and FICO's are still acceptable ✓

Credit score matches rate confirmation ✓

LDP/GSA checked for all parties ✓

Borrower ✓

Co-Borrower N/A

Fail
✓
✗
N/A
N/A
Pass
✓
✓
✓
✓
✓
N/A
N/A
Pass
✓
✓
Pass
✓
✓
Summary
✓
✓
Summary
✓
✓
Pass
✓
✓
Pass
✓
✓
N/A
N/A
N/A
N/A



Audit Checklist

Loan ID: 0000123459
Borrower: Johnson, Zoe
Date Complete: 2011-09-22

Category	Status
Initial Application	Pass
Fully completed (2yr address and work history)	✓
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Loan Officer Signature is present	✓
Borrower signatures are all present	✓
Co-Borrower signatures are all present	✓
Dated by MC and borrowers	✓
Loan Officer Signature is dated	✓
Borrower signatures are all dated	✓
Co-Borrower signatures are all dated	✓
Good Faith Estimate	Fail
Initial is dated within 3 days of initial application	✓
Points disclosed on GFE match HUD	✓
Within acceptable tolerance	✓
Service Provider List is present	✗
Changed Circumstance present for every change	✓
Truth in Lending	Pass
Initial is dated within 3 days of initial application	✓
APR within .125% tolerance	✓
Initial to Final	✓
Intermediate to Final	N/A
Earliest closing date meet	✓
Disclosures	Pass
All Initial disclosures are present	✓
Arm disclosure if applicable	✓
Agreement of Sale	N/A
Address matches LOS	N/A
Sales price matches LOS	N/A
Signed by seller/borrower	N/A
Seller Signature is present	N/A
Purchaser Signature is present	N/A
Seller assist matches LOS	N/A
Addendum's signed by all parties	N/A
Seller Signature is present	N/A
Purchaser Signature is present	N/A
Credit	Pass
Name, address, and SSNs match other docs in file	✓
Borrower name matches LOS	✓
Co-Borrower name matches LOS	N/A
Borrower SSN matches LOS	✓
Co-Borrower SSN matches LOS	N/A
Address matches final 1003	✓
Credit inquiries are explained	✓
Adverse credit is explained	✓
TruAlert/Facta conditions have been received	✓
Date and FICO's are still acceptable	✓
Credit score matches rate confirmation	✓
LDP/QSA checked for all parties	✓
Borrower	✓
Co-Borrower	N/A
Flood Certificate	Pass
Property Address matches 1008	✓
Signed Notice to Borrower is present, if applicable	N/A
Flood Insurance is present, if applicable	N/A

Checklist Report



Category	Status
Income	Pass
Verbal VOE is dated within 10 days of closing	✓
Paystub is dated within 30 days of application	✓
Transcripts match docs in file and application	✓
OT, Bonus, Commission are averaged	✓
Self employment analysis is present if applicable	N/A
Complete tax returns for self employed borrowers	N/A
Assets	Fail
Balances on docs match 1003/DU	✓
Large deposits sourced	✓
Complete 30 day history	✗
Sufficient funds for closing	✓
Reserves verified if needed	N/A
Down payment verified if using	N/A
Appraisal	Pass
Property Address matches LOS	✓
Appraised value matches LOS	✓
Seller matches AOS	✓
Comps are sufficient	✓
Appraiser's license is valid	✓
Appraisal is signed	✓
Final inspection is present, if needed	N/A
Property flip	N/A
Mortgage Insurance	Pass
Sales price match 1008	✓
Loan amount matches 1008	✓
LTV matches 1008	✓
Premium matches 1008	✓
DU/IP Findings	Pass
Address matches Loan Summary	✓
Income matches Loan Summary	✓
Assets match Loan Summary	✓
Credit report number matches Loan Summary	✓
Ratios match Loan Summary	✓
Front Ratio	✓
Back Ratio	✓
LTV matches Loan Summary	✓
Loan program matches Loan Summary	✓
DU version 8.0	✓
Approval	Pass
Conditions cleared	✓
DTI acceptable for investor	✓
Investor specific conditions	✓
\$2500 signed by underwriter	✓
Hazard Insurance	Pass
Borrowers name on policy	✓
Effective at time of review	✓
Sufficient coverage	✓
Mortgagee correct	✓
Condos	N/A
CPM decision validated	N/A
Correct property type on AUS/1008	N/A
Personal Property Insurance is present	N/A

SAS70 Type II/SSAE16 Secure Data Centers



24/7 Physical Security Measures

- EIS Monitoring: Access, Intrusion, Motion and Fire
- Mandatory Badge and Employee Escort
- Interior and Exterior Video Surveillance
- Redundant Motion and Door Detection

SSH or https access for all Cisco equipment

- IDS 4215 scans VLANs for Signatures of known vulnerabilities
- Support access via 3DES VPN with Two Factor Authentication

Cisco ISP best practices for routers and firewalls

- Anti-spoofing & DOS hardening
- Encrypted enable passwords
- TACACS/Radius for admin access
- Default inbound access is no access (all protocols must be explicitly allowed)
- All client VLANs are on FWSM interfaces

