



Complaints, Qualified Written Requests, and Notices of Error **Policy and Procedure**

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I. Purpose

Citadel Servicing Corporation (“CSC”) recognizes the need to timely respond to all received complaints from both potential borrowers and existing borrowers, whose loans are being serviced. The purpose of this policy and procedure guide is to outline CSC’s responsibilities and process for receiving, investigating, and answering any and all complaints, qualified written requests as defined by 12 CFR 1024 (“Regulation X”), and notices of error, request for information as defined by Regulation X.

It is the policy of CSC to respond to customer complaints, disputes and issues swiftly and to take each complaint seriously. CSC promotes a quick, decisive, and accurate response to all inquiries, questions, and concerns brought to our attention. Not all of these situations are in the form of a written complaint presented to CSC by a customer.

II. Qualified Written Requests and Notices of Error

Regulation defines a qualified written request as any written request asking CSC to resolve an error or to send information about their loan. This correspondence can emanate from the borrower or someone acting on their behalf with expressed written authority.

Request can be in the form of the following:

- Notice of Error
 - Error relating to the servicing of a mortgage loan.
- Request for Information
 - Request for information from a borrower relating to the servicing of a mortgage loan
- Identity of Assignee
 - Request for the identity of, and address or other relevant contact information for, the owner or assignee of a mortgage loan.

III. Responses to Qualified Written Requests

CSC will provide a written response acknowledging receipt of any correspondence relating to the servicing of a mortgage loan within 5 business days of receipt of a qualified written request (excluding legal public holidays, Saturdays, and Sundays).

In the cases of an information request pertaining to the owner or assignee of a mortgage loan, the acknowledgement will be provided within 10 days.

Prior to the date of a foreclosure sale or within 30 business days (excluding legal public holidays, Saturdays, and Sundays), whichever is earlier, after you receive a notice of error asserting that you



improperly made the first foreclosure notice or filing, or moved for foreclosure judgment or order of sale, or conducted a foreclosure sale in violation of the federal rules on loss mitigation procedures. CSC may consider cancelation or postpone a foreclosure sale to meet the federally prescribed review and response timelines (when applicable).

For all other information requests, the response will be provided not later than 30 to 45 business days.

After acknowledging receipt of a request, a formal written response will be issued responding to the inquiry, request, or notice of error, and detailing CSC's actions and response thereto. CSC will document the actions (before and after) taken in response to the borrower's request and keep the documentation in a file for at least five (5) years after the date of the request/inquiry.

CSC will issue a single response in any request asserting multiple errors.

CSC will issue a written response for any discovered errors. When notifying borrowers of the found or additional errors. CSC will include a description of the following:

- The error(s) identified
- The action taken to correct the error(s)
- The effective date of the correction
- CSC's contact information, including a telephone number, for further assistance.

CSC may request supporting documentation from the borrower in connection with an investigation of an asserted error but will prohibit the following practices:

- Require the borrower to provide the information as a condition of investigating an asserted error.
- Determine that no error occurred simply because the borrower failed to provide the information requested.

IV. Situations that Do Not Trigger Error Resolution or Information Request Response Procedures

- Duplicative notice of error or information requests
- Overbroad or unduly burdensome request for information
- Overbroad notice of error
- Untimely notices of error or information requests
- Confidential, proprietary, or privileged information
- Irrelevant requests for information



V. CSC Designated Address for Notices of Error or Request for Information

CSC has designated the following address:

15707 Rockfield Blvd. Suite 320, Irvine CA 92618

This address is noted every monthly statement received and on CSC's website:

www.citadelservicing.com

VI. Impact to Collection Activity

Generally, nothing in the error resolution and information request provisions of the rule limits or restricts CSC from pursuing any remedy CSC may have under applicable law, including initiating foreclosure or proceeding with a foreclosure sale.

CSC acknowledges that certain timely notices of error regarding the foreclosure process must be resolved before a foreclosure sale may proceed.

VII. Impact to Credit Reporting

60 days after receipt of a notice of error, CSC may not furnish adverse information to any borrower reporting agency regarding any payment that is the subject of the notice of error. This policy does not apply to requests for information.

VIII. Other Complaints

CSC has extended the Qualified Written Request process to complaints that emanate from the following instances:

- The origination of a mortgage loan
- The underwriting of a mortgage loan
- A subsequent sale or securitization of a mortgage loan
- A determination to sell, assign, or transfer the servicing of a mortgage loan