



INTERNAL MEMORANDUM

Date: July 9, 2021
From: Sara Abdalian, Director of Funding and Post Closing Management
To: Operations and Sales Departments
RE: Change in Circumstance Process

Effective immediately, Acra Lending, a DBA of Citadel Servicing Corporation ("**Acra**"), is making the following guideline and procedural update:

Change in Circumstance ("**CIC**") Request Process:

All CICs are to be done on the Loan Estimate.

However if it is the last day for the Closing Disclosure to go out to fund in the same month and as long as the Closing Disclosure Team can accommodate, the CIC can be done on the Closer Disclosure.

All exceptions/escalations to this process need to go through Transaction Managers/Processing Management team.

All CIC's on CD's will still need to be reviewed by Acra QC before proceeding to ensure the changes are being disclosed in a compliant manner.