

Underwriting Common Questions Guide

Wholesale

12.2025

Summary: This document outlines the most common Underwriting questions and the guidelines surrounding them.

Audience: (Responsibility) Wholesale

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Achieve Personal Loans/Achieve Accelerated Loans

Affirm Accounts

<p><u>Guideline</u></p>	<p>Affirm accounts must be enrolled as separate purchases with their individual account numbers and balances to be eligible for the program.</p> <p>Accounts must be over \$200.00 to be eligible for the program.</p> <p>To obtain the required enrollment information, the client must:</p> <ol style="list-style-type: none"> 1. Open the Affirm app and sign in to their account 2. Tap the Money tab 3. Tap the gear icon in the top right corner 4. Tap Statements 5. Tap the statements they want to view
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Auto Loans

<p><u>Guideline</u></p>	<p>Auto loans are an acceptable type of debt, only if the client is able to provide adequate documentation and the client is no longer in possession of the vehicle itself. (Debt must meet program requirements in addition to the documentation requirements).</p> <p>Does the client still have possession of the car?</p> <ul style="list-style-type: none"> • If YES - We CANNOT enroll the loan. • If NO - Ask these questions: <ul style="list-style-type: none"> ○ Car was totaled - Will insurance claim cover the outstanding balance of the car? ○ If the car is worth less than the insurance pay out, we need to obtain the value of the car, what it was worth, and new balance paperwork. ○ If the car was stolen - need to obtain a police report and insurance claim for pay out value. ○ If the car was sold and funds were pocketed rather than apply to the loan - we cannot accept this (<i>potential fraud</i>) ○ If the client states they do not care if the car gets repossessed the client needs to voluntarily surrender the car and move forward with a deficiency letter. <p>Acceptable Documentation:</p> <ul style="list-style-type: none"> • Credit Report must show R8, R9, I8, or I9 status OR the client must be able to provide a deficiency balance letter from the creditor. • Credit Report must show Repossessed and deficiency letter with proof vehicle has been sold off (must include new balance)
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- Credit Report must show Voluntary Surrender and deficiency letter with proof the vehicle has been sold off (must include new balance).

CREDIT ACCEPTANCE CORP / 2683351 / FA - Automobile Financing Company								
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance
	\$5,091	11/01/2015	\$3,729					\$3,729
Account Condition:	Voluntary surrender						Account #:	
Payment Status:	Account in good standing						Responsibility:	Individual
Account Type:	Auto Loan						Account Terms:	30 Month

OR provide a Credit Report with the account listed with one of the following statuses:

- Merchandise was taken by lender
- Profit & Loss Write Off
- Report as a loss by credit grantor
- Charged Off
- In Collections

CITIZENS BANK NA / 1184370 / BB - All Banks - Non-Specific																
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance								
	\$23,659		\$10,399	06/14/2019				\$10,399								
Account Condition:	Unpaid balance reported as a loss						Account #:									
Payment Status:	No status						Responsibility:	Joint Account								
Account Type:	Auto Loan						Account Terms:	75 Month								
Payment History:	(Up to 25 months)						Delinquency Counter:	30 60 90+ Del								
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	(Past 7 years)			
2016	C	C	1	C	C	C	1	8	8	9			2	0	0	1
2015	C	C	C	C	C	C	C	C	C	C			Worst Delinquency:			
2014													Worst Delinq. P.			

Ineligible Auto Loan Examples:

- If the account condition shows Unknown and the payment status shows No Status on the Credit Report, it is **NOT** eligible.

AUTOMAX / 1917908 / EA - Automobile Financing Company																
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance								
	\$8,713		\$250					\$250								
Account Condition:	Unknown						Account #:									
Payment Status:	No status						Responsibility:	Individual								
Account Type:	Auto Loan						Account Terms:	24 Month								
Payment History:	(Up to 25 months)						Delinquency Counter:	30 60 90+ Derg								
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	(Past 7 years)			
2020													0	0	0	5
2019													Worst Delinquency:			
2018													Worst Delinq. P.			

- If the Account Conditions shows as seriously past due with a payment status showing no status, it is **NOT** eligible.

MOUNTAIN AMERICA FCU / 7778030 / FC - Credit Unions								
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance
	\$5,764		\$0					\$5,901
Account Condition:	Account seriously past due/Account assigned to attorney, collection agency or credit grantor's internal collection department						Account #:	
Payment Status:	No status						Responsibility:	Individual
Account Type:	Auto Loan						Account Terms:	48 Month

- If the account condition shows 'Open Account', it is **NOT** eligible.

COMMERCE BK / 0153058 / BB - All Banks - Non-Specific								
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance
	\$28,624	08/01/2020	\$0		\$470			\$16,191
Account Condition:	Open account				Account #:			
Payment Status:	Account in good standing				Responsibility:			
Account Type:	Auto Loan				Account Terms:			
Payment History:	(Up to 25 months)				Joint Account			
					77 Month			
					Delinquency Counter: (Past 7 years)	30 60 90+ Derog		
						0 0 0 0		
					Worst Delinquency:			
						Worst Delinq Date:		
						Months Reviewed:	40	

Bankers Healthcare Group (BHG)

Guideline	<p>Bankers Healthcare Group (BHG) accounts are acceptable as long as a UCC-1 lien is not attached to it.</p> <ul style="list-style-type: none"> • BHG must have a FULL TIL when enrolling the account <ul style="list-style-type: none"> ◦ The only time a FULL TIL is not needed is when the statement shows that this is a credit card account. <p>BHG Accounts with a UCC-1 Lien are UNACCEPTABLE and will be housed under the security of the TIL showing UCC-1.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>II. SECURITY AGREEMENT (I have read and understand I am executing a security agreement and acknowledge that a UCC-1 Financing Statement will be filed in the appropriate state INITIAL:)</p> <p>OTHER REPRESENTATIONS</p> </div>
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Business Debt

Guideline	<p>Business debt is eligible if the debt meets the outlined requirements:</p> <ul style="list-style-type: none"> • Business debt listed as personally guaranteed on the Credit Report is eligible for ARP. • Account type must be labeled as Business Debt in Salesforce. <p>Debt Consultants should always research the business to verify if it is still active on the SOS (Secretary of State) website.</p> <p><u>Secretary of State Business Entity Search (all 50 states)</u></p> <ul style="list-style-type: none"> • Business Debt with Sole Proprietorship must be enrolled regardless if the business is still active. (These are usually on the Credit Report) Sole Proprietorship needs to be researched if not reporting on the Credit Report.
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	<ul style="list-style-type: none"> • LLC, Partnership, S-Corp, C-Corp must be dissolved and verified through the Secretary of State (SOS) website to be eligible for enrollment. <ul style="list-style-type: none"> ◦ If the account is reporting on the Credit Report, the account does not need to be researched as it is personally guaranteed. <p>SBA (Small Business Administration) Loans are not eligible for enrollment.</p>
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California 1405 (CA 1405)

<u>Guideline</u>	<p>If a client from California is enrolling into the program, they would need to follow the California requirements.</p> <p>FDR clients can only enroll debt(s) they are legally responsible for; 3rd party joint debt is not eligible for California clients. This means:</p> <ul style="list-style-type: none"> • Joint debt with a person/persons not enrolling in the program are not considered eligible for the program. <ul style="list-style-type: none"> ◦ I.e.: John and Jane are enrolling in the program and have joint debts; these are eligible. However, Jane has a loan with Kelly. This debt with Kelly will not be eligible to enroll since Kelly is not enrolled into the program with Jane. • The total amount of the debt required to be listed on the agreement may be based on either a billing statement for the debt or information in the consumer's credit report. The billing statement or consumer report must have been issued within 30 days of the date of the contract. • If the sales consultation, including the negotiation of the DRA, is done in Spanish, then FDR must provide a copy of the DRA in English and Spanish. • If the agent finds out the debt is not with the client/co-client, the debt cannot be enrolled and the account is considered unacceptable.
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CIP Validation

<u>Guideline</u>	<p>A Customer Identification Program (CIP) is a United States requirement, where financial institutions need to verify the identity of individuals wishing to conduct financial transactions with them as a provision of the USA Patriot Act.</p> <ul style="list-style-type: none"> • Verify that the client's CIP information on the credit report matches the file, including their name, physical address, SSN, and date of birth. <ul style="list-style-type: none"> ◦ If the client's address on the file matches an address other than the Best Address** listed on the Credit Report, no documentation is needed. (Best Address, refers to Experian Credit Report; refer to Source of Information for Transunion Credit Reports)
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- If the client's city on the file and on the CR are different, but the zip code has been verified as being the same Zip code on USPS.com , we can take it as is. No additional documentation will be required.
- **FDR will accept an ITIN client**, however the CIP process still applies and all four forms of documentation will be needed (Physical Address, SSN/ITIN, DOB, Name).
- If the documentation provided is illegible in any way, it cannot be accepted.

Acceptable CIP documentation:

Physical Address	SSN/ITIN	Date of Birth	Name
Utility bill (electric, water, cable, phone, internet, etc.) listing service address dated within the past 6 months	Signed Social Security Card (or ITIN Card)	Current state driver's license or ID card	Current state driver's license or ID card
2 copies of anything mailed or a delivery receipt from dated within the past 6 months	A letter from the social security Administration showing full SSN #	Current U.S. Passport	Current U.S. Passport
	W-2 showing full SSN#	U.S. birth certificate	U.S. birth Certificate
Current Lease/rental agreement	Social Security statement showing full SSN#	Resident alien card	Resident alien card
Most current property tax statement	A paystub with full SSN# showing	Permanent resident card	Permanent resident card
Current Homeowner's insurance statement, bill, or policy			
Current Home loan statement			

	Current state driver's license or ID card W-2 (current year)			
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CIP Documentation Examples:

- Utility bill containing the service address:
 - Must be dated within the last 6 months



- Driver's License



- Social Security Card



- United States Passport



Contents for Collateral

<u>Guideline</u>	Accounts that have Collateral under the creditor name are eligible to enroll without additional documents. They are debts that were sold to new creditors and are not secured.																																
	<p>B B CAPITAL ONE 06/23 06/13 [REDACTED] 330 05/23 COLLATERAL: PFROM SYNCHRONY</p> <p>B B FB&T/MERCURY 06/23 08/14 [REDACTED] 43 06/23 COLLATERAL: PFROM BARCLAYS BANK DELAWARE</p> <table border="1"> <thead> <tr> <th colspan="8">004</th> </tr> <tr> <th>ECOA / WHOSE B / B</th> <th>ACCT TYPE OPEN</th> <th>REPORTED 07/24</th> <th>H/CREDIT \$12099</th> <th>PAYMENT \$12099*</th> <th>30 0</th> <th>60 0</th> <th></th> </tr> </thead> <tbody> <tr> <td>SOURCE TU</td> <td>TERMIN -</td> <td>OPENED 06/23</td> <td>BALANCE \$12099</td> <td>PAST DUE \$0</td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="8">CREDIT LINE NO LONGER AVAILABLE - IN REPAYMENT PHASE COLLATERAL: DEFERRED TO 082</td> </tr> </tbody> </table>	004								ECOA / WHOSE B / B	ACCT TYPE OPEN	REPORTED 07/24	H/CREDIT \$12099	PAYMENT \$12099*	30 0	60 0		SOURCE TU	TERMIN -	OPENED 06/23	BALANCE \$12099	PAST DUE \$0				CREDIT LINE NO LONGER AVAILABLE - IN REPAYMENT PHASE COLLATERAL: DEFERRED TO 082							
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CREDIT LINE NO LONGER AVAILABLE - IN REPAYMENT PHASE COLLATERAL: DEFERRED TO 082																																	

Cross River Bank Loans

<u>Guideline</u>	<p>Cross River Bank loans by themselves are not eligible for FDR/ARP.</p> <p>Loans that are simply funded by Cross River Bank (i.e. Rocket Loans) and the funder is Cross River Bank are eligible loans for FDR/ARP.</p> <p><u>Eligible:</u></p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p style="text-align: center;">B B ABOVE/CROSS RIVER BANK</p> <hr/> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Lender: Cross River Bank 2115 Linwood Avenue Fort Lee, NJ 07024 </td><td style="width: 50%; vertical-align: top;"> Loan Servicer: Cherry Technologies Inc. 2 Embarcadero Center San Francisco, CA 94111 </td></tr> </table> <p style="text-align: center; font-size: small;">For Customer Service, please contact us at 800 820 7474</p> </div> <p><u>Unacceptable:</u></p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p style="text-align: center;">COLLECTION ACCOUNTS</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">001 ECDA / WHOSE B / B</th> <th rowspan="2">LVNIV FUNDING</th> <th rowspan="2">ACCT TYPE COLL</th> <th rowspan="2">REPORTED 06/23</th> <th rowspan="2">HS CREDIT \$4740</th> <th rowspan="2">PAYMENT</th> <th>30</th> <th>60</th> <th>90+</th> <th colspan="3">COLLECTION</th> </tr> <tr> <th>TERM</th> <th>OPENED</th> <th>BALANCE</th> <th>PAST DUE</th> <th>NO REV</th> <th>LAST LATE</th> <th>DIA</th> </tr> </thead> <tbody> <tr> <td>TU</td> <td></td> </tr> </tbody> </table> <p style="text-align: center; margin-top: 5px;">PLACED FOR COLLECTION; ORIGINAL CREDITOR: 12 CROSS RIVER BANK</p> </div>	Lender: Cross River Bank 2115 Linwood Avenue Fort Lee, NJ 07024	Loan Servicer: Cherry Technologies Inc. 2 Embarcadero Center San Francisco, CA 94111	001 ECDA / WHOSE B / B	LVNIV FUNDING	ACCT TYPE COLL	REPORTED 06/23	HS CREDIT \$4740	PAYMENT	30	60	90+	COLLECTION			TERM	OPENED	BALANCE	PAST DUE	NO REV	LAST LATE	DIA	TU										
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Debt Settlement Accelerated Loan

<u>Guideline</u>	<p>A debt settlement accelerated loan is a loan offered to consumers that are currently in debt resolution programs. With an acceleration loan, the proceeds are provided to fund the consumer's debt resolution program and accelerate the negotiation and settlement process. After that, their debt resolution program is complete, and the consumer's payments for that program will end. Finally, the consumer will begin making payments for their acceleration loan instead. <u>This guideline applies to FDR/ARP.</u></p> <p>Clients are NOT eligible for enrollment where either of the following two conditions are true:</p> <ul style="list-style-type: none"> • Condition 1: <ul style="list-style-type: none"> ◦ Consumer originated a Debt Settlement Acceleration Loan within the previous 6 months. • Condition 2: <ul style="list-style-type: none"> ◦ Consumers are attempting to enroll only a single account into their program and that one account is a Debt Settlement Acceleration Loan. <p><u>List of Known Debt Settlement Acceleration Loans:</u></p> <ul style="list-style-type: none"> • Reach Financial
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- Debt resolution program serviced by National Debt Relief

REACH FINANCIAL LLC /		/ FP - Personal Loan Companies																
Open Date	Original Amount	Status Date		Past Due	Last Paid Date		Scheduled Payment		Actual Payment	Balance Date		Current Balance						
09/22/2020	\$13,095	10/01/2023		\$0	10/05/2023		\$375			10/11/2023		\$6,485						
Account Condition	Open account						Account #											
Payment Status:	Account in good standing						Responsibility:		Individual									
Account Type:	Unsecured Loan						Account Terms:		57 Month									
Payment History: (Up to 25 months)	Jan		Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Delinquency Counter: (Past 7 years)	30	60	90+	Dereg
	2023		C	C	C	C	C	C	C	C	C	C		0	0	0	0	
	2022		C	C	C	C	C	C	C	C	C	C						
	2021																	
														Months Reviewed:	36			

REACH FINANCIAL/PATHWA () / FP - Personal Loan Companies								
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance
11/22/2019	\$10,811	10/01/2023	\$0	09/30/2023	\$309		10/08/2023	\$2,548
Account Condition	Open account				Account #			
Payment Status:	Account in good standing				Responsibility:		Individual	
Account Type:	Unsecured Loan				Account Terms:		55 Month	

- New Credit America

- Debt resolution program serviced by Century

NEW CREDIT AMERICA / 1667330 / FP - Personal Loan Companies																	
Open Date	Original Amount	Status Date	Past Due	Last Paid Date		Scheduled Payment	Actual Payment	Balance Date		Current Balance							
12/21/2021	\$13,784	09/01/2023	\$0	09/01/2023		\$400		09/30/2023		\$10,891							
Account Condition	Open account						Account #										
Payment Status:	Account in good standing						Responsibility:										
Account Type:	Unsecured Loan						Account Terms:	Individual									
Payment History: (Up to 25 months)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Delinquency Counter: (Past 7 years)	30	60	90+	Derog
	2023	C	C	C	C	C	C	C	C	C	C	0	0	0	0	0	
	2022	C	C	C	C	C	C	C	C	C	C	Worst Delinquency:					
	2021										C	Worst Delinq Date:					
												Months Reviewed:	22				

- **Above Lending**

- Debt resolution program serviced by Beyond Debt Relief & Accredited Debt Relief

ABOVE LENDING INC / 2940989 / FP - Personal Loan Companies																	
Open Date	Original Amount	Status Date	Past Due	Last Paid Date		Scheduled Payment	Actual Payment	Balance Date	Current Balance								
03/29/2023	\$29,875	09/01/2023	\$0	08/24/2023		\$915		09/28/2023	\$30,762								
Account Condition	Open account								Account #								
Payment Status:	Account in good standing								Responsibility:	Individual							
Account Type:	Unsecured Loan								Account Terms:	130 Month							
Payment History: (Up to 25 months)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Delinquency Counter: (Past 7 years)	30	60	90+	Derog
	2023			C	C	C	C	C	C			0	0	0	0	0	
	2022																
	2021																
											Worst Delinquency:						
											Worst Delinq Date:						
											Months Reviewed:	06					

- Credit9

- Debt resolution program serviced by Americor

CREDIT9 LLC / 1797300 / FP - Personal Loan Companies																																																										
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance																																																		
06/14/2023	\$18,653	07/01/2023	\$0	07/14/2023	\$618		07/31/2023	\$18,418																																																		
Account Condition: Open account Payment Status: Account in good standing Account Type: Unsecured Loan Payment History: (Up to 25 months)																																																										
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CREDIT9 LLC / 1797300 / FP - Personal Loan Companies																																																										
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance																																																		
01/09/2023	\$44,998	07/01/2023	\$0	07/08/2023	\$1,286		07/31/2023	\$40,796																																																		
Account Condition: Open account Payment Status: Account in good standing Account Type: Debt Consolidation Payment History: (Up to 25 months)																																																										
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- **LendingUSA Fresh Start**

- Debt resolution program serviced by Clear One & Start New Financial

LENDING USA LLC / 180FP21437 / FP - Personal Loan Companies																																																										
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance																																																		
10/29/2024	\$0	\$0		01/01/2025	\$312		01/31/2025	\$11,211																																																		
Account Condition: Open account Payment Status: CURRENT Account Type: Unsecured Loan Payment History: (Up to 25 months)																																																										
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Jan</th><th>Feb</th><th>Mar</th><th>Apr</th><th>May</th><th>Jun</th><th>Jul</th><th>Aug</th><th>Sep</th><th>Oct</th><th>Nov</th><th>Dec</th> </tr> </thead> <tbody> <tr> <td>2025</td><td>C</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td>2024</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>C</td><td>C</td></tr> <tr> <td>2023</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td></tr> </tbody> </table>											Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	2025	C											2024	-	-	-	-	-	-	-	-	-	C	C	2023	-	-	-	-	-	-	-	-	-	-	-
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- **Versera Lending**

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002	ECOA / WHOSE B / B	VERSARALEN	TERM	OPENED 12/21	BALANCE \$20225	PAST DUE \$0				MO REV 05 LAST LATE --/- DLA 05/22		
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002	ECOA / WHOSE B / B	VERSARALEN	TERM	OPENED 06/21	BALANCE \$19423	PAST DUE \$0				MO REV 11 LAST LATE --/- DLA 05/22		
UNSECURED												

Debt Settlement Programs

Guideline	A client cannot be enrolled in more than one debt settlement program. This includes:
	<ul style="list-style-type: none"> ● Debt Settlement Programs ● Credit Counseling

- | | |
|--|---|
| | <ul style="list-style-type: none"> • Credit Repair |
|--|---|

Discontinued Services

<u>Guideline</u>	<p>Discontinued Services are eligible for enrollment. Public Utility Services must be in third-party collections to be eligible for enrollment.</p> <p>Examples of accounts MUST be in third-party collections:</p> <ul style="list-style-type: none"> • Gas/Electric/Water <p>Examples of accounts that DO NOT need to be in third-party, charged off, or reporting closed:</p> <ul style="list-style-type: none"> • Cell phone/Gym membership/Pest control/Security System/Cable/Car rentals <p>Comcast Cable would be considered a Discontinued Service meaning the client may enroll the debt as long as it is not their current service provider.</p>
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High Interest Rate Loans

<u>Guideline</u>	<p>A High Interest Rate (HIR) loan is categorized as a loan with an interest rate at or above 50% and has a term length less than 14 months. High Interest Loans are eligible for the program if the loan is unsecured and over the \$200.00 balance.</p> <p>If the loan is not on the credit report, client must provide a Statement/TIL (Truth in Lending) with the following information:</p> <ul style="list-style-type: none"> • Name of Client • Lending Institution • Balance • Date within one billing cycle up to 45 days (within 30 days for CA) • Account Number <p>Please note: HIR are unacceptable single account types.</p>
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Insurance Debt

<u>Guideline</u>	<p>Insurance debt is NOT acceptable EVEN if it is with a 3rd party collections agency.</p> <p>Examples of Insurance Debt:</p> <ul style="list-style-type: none"> • Fidelity National Loans • Receivable
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- | | |
|--|---|
| | <ul style="list-style-type: none"> • Liberty Mutual • Progressive Insurance |
|--|---|

Judgments

<u>Guideline</u>	<p>A judgment is a formal decision made by a court following a lawsuit. In the world of credit, it's the final part of litigation, when a creditor or debt collector sues a debtor (client) for nonpayment of their debts and obtains a judgment.</p> <p>Judgments must be older than 6 months to be eligible for enrollment</p> <p>ARP files CANNOT enroll judgements</p>
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Legal Accounts

<u>Guideline</u>	<p>FDR will accept accounts that have been sent to a law firm (both ISL and OSL).</p> <p>Exception: Accounts in ACTIVE LITIGATION cannot be enrolled.</p> <p>In State Legal (ISL) - Accounts being handled by a law firm that is registered to litigate in the same state as the prospect's residence.</p> <p>Out of State Legal (OSL) - Accounts being handled by a law firm that is NOT registered to litigate in the same state as the prospect's residence.</p> <p>Active Litigation - Client has been served a summons and complaint for the debt on the account.</p>
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Medical Debt

<u>Guideline</u>	<p>Medical debt refers to the debt incurred by individuals due to health care costs and related expenses. Medical debt is eligible for enrollment for FDR/ARP.</p> <ul style="list-style-type: none"> • Minimum balance of \$200.00 at the time of enrollment. • Require the Patient Name associated with the enrolling medical account. <ul style="list-style-type: none"> ◦ If the medical debt is with a Veterinary account, the pet's name must be provided. • Medical Payment Data is not considered the OG/Creditor name and must be updated to the original creditor. • Urgent Care needs to have the city name included. <ul style="list-style-type: none"> ◦ For example: San Jose Urgent Care
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MEDICAL PAYMENT DATA / 19261 / YC - Other Collection Agencies												
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance				
	\$1,395			\$1,395				\$1,395				
Account Condition	Unknown						Account #					
Payment Status:	Account seriously past due/Account assigned to attorney, collection agency or credit grantor's internal collection department						Responsibility:	Individual				
Account Type:	Collection Department/Agency/Attorney						Account Terms:	1 Month				
Payment History:	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024
(Up to 25 months)					9	9	9					
Delinquency Counter:							30 60 90+ Derog					
(Past 7 years)							0 0 0	3				

How Medical debt may appear on the Credit Report:

ABILITY RECOVERY SERVI / 1934712 / YC - Other Collection Agencies												
Open Date	Original Amount	Status Date	Past Due	Last Paid Date	Scheduled Payment	Actual Payment	Balance Date	Current Balance				
	\$1,902			\$1,902				\$1,902				
Account Condition	Unknown						Account #					
Payment Status:	Account seriously past due/Account assigned to attorney, collection agency or credit grantor's internal collection department						Responsibility:	Individual				
Account Type:	Collection Department/Agency/Attorney						Account Terms:	1 Month				
Payment History:	Jan 2024	Feb 2024	Mar 2024	Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024
(Up to 25 months)					9	9	9	9				
Delinquency Counter:							30 60 90+ Derog					
(Past 7 years)							0 0 0	4				
Worst Delinquency:							Worst Delinq Date:					
Months Reviewed:							Months					
							Reviewed:	04				
Original creditor: MEDICAL PAYMENT DATA												

COLLECTION ACCOUNTS										
001	ECOA / WHOSE B / B	CERTFD RCVRY	ACCT TYPE	REPORTED	H/CREDIT	PAYMENT	30	60	90+	COLLECTION
			COLL	OPENED	\$4265	-	-	-	-	
	SOURCE TU		TERM		BALANCE	PAST DUE				MO REV LAST LATE DLA
			-		\$4898	\$4898				- ---/-- ---/--
PLACED FOR COLLECTION; ORIGINAL CREDITOR: MEDICAL										

COLLECTIONS		DATE OPENED	BALANCE
CER STS REC			\$349
ACCOUNT NUMBER		LAST REPORTED	
HIGHEST BALANCE \$349			
CREDITOR OR INFO		ORIGINAL CREDITOR	
CENTRAL STATES 1314 N MAIN P.O. BOX 3130 HUTCHINSON, KS 67501 (620) 663-8811		KINGMAN COMMUNITY HOSPITAL	
RESPONSIBILITY		Individual	
ACCOUNT DISPUTED		Account not disputed	
ACCOUNT CONDITION		Derogatory	
REMARKS		Placed for collection	

Military Debt

<p><u>Guideline</u></p>	<p>Military Backed Debt is NOT eligible for enrollment:</p> <ul style="list-style-type: none"> ● Armed Forces Bank ● Pioneer ● Omni ● Military Star <p>Example of Security Clearance associated jobs:</p> <ul style="list-style-type: none"> ● Armed Forces ● Navy ● Air Force ● Marines ● Coast Guard ● Secret Service ● ICE ● Department of Homeland Security ● Any business sub contracted by the US Military (any branch) <p><i>This is a list of known lenders and positions, but is not inclusive to every possible lender/job.</i></p>
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Mortgage Loans

<p><u>Guideline</u></p>	<p>Mortgage loans are acceptable if the client is able to provide proof of deficiency and a HUD-1 (the Department of Housing and Urban Development).</p> <p>Acceptable Documents:</p> <ul style="list-style-type: none"> ● HUD-1 (the Department of Housing and Urban Development) <ul style="list-style-type: none"> ○ This document will show that the client doesn't own this mortgage and is in someone else's name or a company name. ○ The FULL HUD-1 document must be provided (3 pages) ○ Current Statement showing the balance is still owed by the client (45 days) <p><u>There are NO EXCEPTIONS to the acceptable documents above.</u></p>
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	<p style="text-align: right;">OMB Approval No. 2502-0265</p> <p>A. Settlement Statement (HUD-1)</p> <p>B. Type of Loan</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">1. <input type="checkbox"/></td> <td>FHA</td> <td style="width: 25%;">2. <input type="checkbox"/></td> <td>RHS</td> <td style="width: 25%;">3. <input type="checkbox"/></td> <td>Conv. Unins.</td> <td style="width: 25%;">6. File Number:</td> </tr> <tr> <td>4. <input type="checkbox"/></td> <td>VA</td> <td>5. <input type="checkbox"/></td> <td>Conv. Ins.</td> <td></td> <td></td> <td>7. Loan Number:</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>8. Mortgage Insurance Case Number:</td> </tr> </table>	1. <input type="checkbox"/>	FHA	2. <input type="checkbox"/>	RHS	3. <input type="checkbox"/>	Conv. Unins.	6. File Number:	4. <input type="checkbox"/>	VA	5. <input type="checkbox"/>	Conv. Ins.			7. Loan Number:							8. Mortgage Insurance Case Number:
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4. <input type="checkbox"/>	VA	5. <input type="checkbox"/>	Conv. Ins.			7. Loan Number:																
						8. Mortgage Insurance Case Number:																

Preferred Credit

<u>Guideline</u>	Preferred Credit accounts are acceptable for enrollment even if it is reporting secured. Preferred Credit has agreed to release the security interest for the sake of settling with Freedom.
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Recreational Merchandise

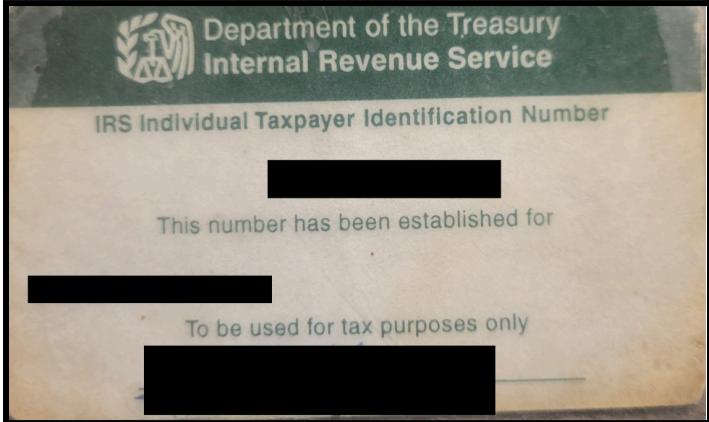
<u>Guideline</u>	Recreational Merchandise Loans are an acceptable type of debt when the merchandise has been taken back and sold to reduce the original loan amount. This means the client no longer is in possession of the merchandise. <i>(Debt must meet program requirements in addition to the documentation requirements).</i> <p>Acceptable Documentation:</p> <ul style="list-style-type: none"> • The client must be able to provide a deficiency balance letter from the creditor. <ul style="list-style-type: none"> ◦ Repossessed-proof vehicle has been sold off (must include new balance) ◦ Voluntary Surrender-proof vehicle has been sold off (must include new balance) • OR provide a Credit Report with the account listed with one of the following statuses: <ul style="list-style-type: none"> ◦ Merchandise was taken by lender ◦ Profit & Loss write-off ◦ Reported as a loss by credit grantor ◦ Charged Off ◦ In Collection
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Reinstatements/Post Graduation Re-Enrollment

<u>Guideline</u>	A reinstatement is the process of restoring a client's account after a termination/rescission has been processed by Client Services. Freedom Debt Relief (FDR)/Attorney Represented Program (ARP) Reinstatement Policy:
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	<p>If the termination/rescission date is <u>less than 90 days</u>:</p> <ul style="list-style-type: none"> • No matter who the client contacts for an enrollment/reinstatement, CS must reinstate (unit will stay with the original Sales Agent) <p>If the termination/rescission date is <u>greater than 90 days</u>:</p> <ul style="list-style-type: none"> • Client is able to re-enroll with a new file <p>Clients that have graduated the program and are looking to re-enroll within 12 months of completing the program are eligible, but any debt opened within the last 12 months is NOT eligible for enrollment.</p>
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Resident Alien/ITIN

<p><u>Guideline</u></p>	<p>Clients must have a valid SSN or ITIN (Individual Tax Identification Number) to be eligible for enrollment.</p> <ul style="list-style-type: none"> • If a client does not have a valid SSN or ITIN number, the client will not be eligible for enrollment • An ITIN client must provide all four verification documents (Name, Address, DOB, SSN/ITIN) • FDR will accept an ITIN and can be used in place of a SSN 
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Single Account Type Program

<u>Guideline</u>	<ul style="list-style-type: none"> Max term length for a Single Account type program is 30 months FDR/ARP will not accept the following in a single account type program: <ul style="list-style-type: none"> High Interest Rate Collections with the same original creditor Discover/AMEX/Debt Settlement Accelerated Loans <ul style="list-style-type: none"> For example: Discover Card and Discover Loan would not be eligible If the account has one of each it is okay to enroll <ul style="list-style-type: none"> For example: AMEX and Discover are eligible to enroll together
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Student Loans

<u>Guideline</u>	<p>Only Private Student Loans are eligible for enrollment.</p> <ul style="list-style-type: none"> Federal loans are not acceptable Student loans in Deferment/Forbearance are not acceptable Student loans with an Educational Facility, trade school, and/or tuition services must currently be with a third party collections agency to be eligible for enrollment <p>To determine if a loan is Federal or Private, clients should obtain an NSLDS</p> <p>Private Student Loan Lenders:</p> <ul style="list-style-type: none"> SoFi First Merit Bank Sallie Mae (2014 and on) <p>Federal Student Loan Lenders:</p> <ul style="list-style-type: none"> Aidvantage
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- ECMC
- US Department of ED

Both Private and Federal (Obtain NSLDS to confirm):

- AES/Truist
- MOHELA/Sofi
- Sallie Mae (prior to 2014)
- NELNET

Please reference the Student Loan Debt in the Agent Folder for a complete list of lenders.