



Home Savings of America - Wholesale Lending Division
Anti-steering/Safe Harbor
Broker's Statement of Compliance

Date: _____ Borrower Name: _____ Loan # _____

Broker Name/ (type/Print) _____ NMLS # _____

Broker Company Name (type/Print) _____ NMLS # _____

**Submit with applications for Lender Paid Broker Compensation packages on/after April 1, 2011
OR
When compensation changes from Borrower Paid to Lender Paid**

Regulation Z prohibits a loan originator from steering a borrower to consummate a transaction based on the fact that the originator will receive greater compensation from the creditor for that transaction than other transactions offered or could have offered to the consumer, unless the consummated transaction is in the consumer's interest.

Broker's Statement of Compliance

1. The Loan submitted is in compliance with Regulation Z §226.25 and §226.36 rules regarding Loan Originator Compensation and Anti-steering
2. I did not steer or direct the consumer to consummate a loan transaction in order to receive greater compensation from HSOA in this transaction than in other transactions I offered or could have offered the borrower, unless the transaction is in the consumer's best interest per Regulation Z.
3. For each type of transaction (Fixed Rate, ARM or Reverse Mortgage) in which the consumer expressed an interest, I provided the following options in writing from creditors with whom I regularly do business
 - a. A loan with the lowest interest rate;
 - b. A loan with the lowest total dollar amount for origination points, fees or discount points; and
 - c. A loan with the lowest interest rate without negative amortization, prepayment penalty, interest only payments, balloon payments in first 7 years of the life of the loan, a demand feature, shared equity, or shared appreciation.
4. I believe in good faith that the options presented to the consumer as noted above, are loans for which the consumer likely qualifies.
5. Upon request of HSOA I will provide documents, within five (5) business days, evidencing compliance # 3 above and Regulation Z.