

Appendix E – MortgageIT Broker-applicants Assessment

1.1 Quarterly MortgageIT Broker-applicants AML/NCA File Assessment - Overview

The GM AML Compliance Officer assigned to MortgageIT will conduct a *Quarterly NCA File Assessment* ("File Assessment") on 10 mortgage broker-applicants approved and funded by MortgageIT ("MIT") to evaluate the adequacy of the CIP performed. This quarterly File Assessment is designed to assess the CIP controls instituted by MortgageIT on brokers as well as any escalation for higher risk relations as defined by DB AML and MIT Policies and Procedures.

The File Assessment will focus on the functional aspects of the required Customer Identification Program elements (Notification, Identification, Verification) as well as Documentation. It will also include evidentiary and qualitative review of PCR alert escalations. As part of the File Assessment, the AML Compliance Group will take into consideration DB AML policy, MIT AML procedures, and applicable USA PATRIOT Act provisions. The results will then be shared with DB AML Compliance and MIT Compliance Management.

2.1 Quarterly NCA File Assessment- Procedures –

The AML Compliance Group will randomly select 10 mortgage loan applications approved and funded by MIT in the previous quarter.

- GM AML Compliance will send e-mail to MIT's head of Branch Operations Support Services, MIT Compliance, the Head of GM AML Compliance, and the Head of AML Compliance for the Americas informing them of file assessment;
- The head of Branch Operations Support Services will provide a list of all mortgage brokers approved in the previous quarter to GM AML Compliance.
- GM AML Compliance will select 10 random brokers from this list and send an e-mail message to MIT Branch Operations Support Services to request required AML/CIP information for the broker applications selected.
- Branch Operations Support Services will make the AML/CIP information from the 10 selected files available for inspection by GM AML Compliance.
- Files to be checked for functional aspects as listed on the Quarterly NCA File Assessment Form:
 - CIP Notification
 - Broker Identification
 - Documentary Verification of Identification
 - OFAC
 - PCR check
 - PCR alerts
 - Non-Documentary Verification of Identification
 - CIP Identity Verification Checklist
 - Enhanced Due Diligence
 - Politically Exposed Person
- Broker application file to be reviewed for applicable functional aspects from Quarterly NCA File Assessment Form for brokers and principals as follows:
 - Name
 - Physical Address
 - Social Security Number/EIN

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