



Complaints Handling Policy

2014

Introduction

Objective and Purpose of the Complaints Handling Policy

Integrity First Financial Group, Inc. (“**IFFG**”) seeks to maintain its reputation as a mortgage lender that delivers high quality professional services. IFFG is also committed to maintaining its responsiveness to the needs and concerns of its clients. This Policy is designed to provide guidance on the manner in which IFFG receives and handles complaints made against the firm, which includes its principals, partners, employees and consultants, as may be applicable. The objective of the Policy is to assist the firm in resolving complaints in an efficient, effective and professional manner.

Federal Regulatory Background

In response to the 2007-08 U.S. housing crisis and resulting recession, the United States Congress passed the Secure and Fair Enforcement for Mortgage Licensing Act (the “**SAFE Act**”) in 2008 to establish a national licensing system for all state regulators to use in licensing mortgage professionals. The Consumer Financial Protection Bureau (“**CFPB**”) was subsequently created in 2011 (the same year the final SAFE Act was published) as a result of the Dodd-Frank Wall Street Reform and Consumer Protection Act. The CFPB is the federal agency that holds primary responsibility for regulating consumer protection in the United States and enforces the SAFE Act through the National Mortgage Licensing System (“**NMLS**”).

NMLS was created by the Conference of State Bank Supervisors (**CSBS**)’ and the American Association of Residential Mortgage Regulators. It is owned and operated by the State Regulatory Registry LLC, a wholly owned subsidiary of CSBS. NMLS is the sole system of licensure and record for mortgage companies and Mortgage Loan Originators for most U.S. state and territorial agencies including Florida.

IFFG aligns its procedures with the current best practices as may be required and amended by the NMLS from time to time.

Definition of a Complaint

This Policy is intended to address complaints made to IFFG. While complaints may have several meanings, IFFG has defined a complaint under this Policy as: ‘An expression of dissatisfaction made to an organization related to its services, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.’ Any person or organization (**Complainant**) who is dissatisfied with a service provided by the firm, for any reason, may contact IFFG to make a complaint. A complaint may be oral or written. At times, complaints can be made by way of negative feedback, which may not require a resolution or formal follow-up. While this type of feedback is valuable, the Policy does not apply to feedback of this nature because all complaints received by IFFG shall be responded to in writing.

Guiding Principles of Effective Complaints Handling

IFFG has implemented the following guiding principles of effective complaints handling:

Principle	IFFG’s response
Visibility	Our Complaints Handling Policy is available on the IFFG Website and hard copies will also be made available to anyone upon request.
Accessibility	Our Complaints Handling Policy is readily accessible to all clients, principals, partners, employees and consultants, as may be applicable. This Policy is easy to understand and includes details on making and resolving complaints.
Responsiveness	Receipt of each complaint will be promptly acknowledged to the Complainant. Complaints will be handled in an efficient and effective manner. Complainants will be treated courteously and kept informed of the progress of their complaint throughout the complaint-handling process.
Objectivity	Each complaint is addressed in an equitable, objective and unbiased manner through the complaints-handling process.
Fees	There will be no fees assessed to the Complainant for making a complaint.
Confidentiality	Personally identifiable information concerning the Complainant is actively protected from disclosure unless the Complainant expressly consents to its disclosure.
Customer-focused Approach	All principals, partners, employees and consultants of IFFG, as may be applicable, including the President, are committed to efficient and fair resolution of complaints. IFFG actively solicits feedback from its clients on a regular basis and acknowledges a client’s right to complain.
Accountability	All principals, partners, employees and consultants accept responsibility for effective complaints handling. The President will ensure that, where appropriate, issues raised in the complaints handling process are reflected in principal, partner or employee performance evaluation, if applicable.
Continual Improvement	IFFG’s complaints handling process will be reviewed periodically, and at least annually, in order continually enhance efficient delivery of effective outcomes.

Handling a Complaint

How a Complaint May Be Made

Where a complaint is about a particular engagement, service, principal, partner, employee or consultant, and the Complainant is familiar with the person(s) working on the Complainant's matter, the Complainant may wish to address the complaint to a specific or the most appropriate person, orally, by letter, email or fax. Where possible, complaints should be made in writing so that the details of the complaint are clear and complete. If the Complainant is not sure to whom the complaint should be referred, or feels that it would be inappropriate to address the complaint to a specific person, the Complainant should contact the President of IFFG. The President, taking full responsibility for the actions of IFFG and its principals, partners, employees and consultants, as applicable, is therefore also responsible for all quality assurance and risk management affairs of the firm. His contact particulars are as follows:

Alex Barnett
Integrity First Financial Group, Inc.
6333 Greenwich Drive
Suite 280
San Diego, CA 92122
(858) 459-4789 [Phone]
alex@iffghomeloans.com

Information Required When Making a Complaint

When making a complaint, the following information should be provided by the Complainant to IFFG:

- Name of the company or individual(s) involved, the individual's title, and all relevant contact particulars of the Complainant
- Complainant's relationship with IFFG (i.e., the nature of Complainant's engagement with IFFG and whether you are an existing or prospective client)
- Contact person at IFFG to whom Complainant would wish to address the complaint
- Nature of the complaint (including what was said or done resulting in the need to file a complaint, and when the conduct giving rise to the complaint occurred)
- Details of the IFFG principal, partner, employee or consultant involved (if applicable)
- Copies of any documentation supporting the complaint (i.e., contracts, account statements, disclosure documents, canceled checks or money wires, sales materials and advertisements).

Assistance with Making a Complaint

If the Complainant requires assistance in formulating or lodging a complaint, the Complainant should not hesitate to contact the President of IFFG at any time (please see contact information provided above).

Acknowledgment of Complaints

IFFG is committed to acknowledging all complaints promptly upon receipt. Once a complaint has been received, an initial review of the complaint will be undertaken. IFFG will work to resolve complaints within 30 days of receiving the complaint.

During the Complaint Process

The Complainant is encouraged to inquire into the status of the complaint by contacting the President of IFFG at any time.

Response to a Complaint

Once IFFG has reviewed the complaint, IFFG will provide a written response to the Complainant. If the Complainant is dissatisfied with IFFG's response, the Complainant may ask IFFG to reconsider the response. Such a request should be made in writing and forwarded by mail, email or fax to the address of the President as provided above.

Further Action

If the Complainant is dissatisfied with the manner in which the complaint has been handled, the Complainant may refer the matter to the following external dispute resolution bodies:

National Mortgage Licensing System & Registry (NMLS) Resource Center

(240) 386-4444 or: www.mortgage.nationwidelicencingsystem.org/contact/Pages/default.aspx

U.S. Department of Housing and Urban Development (HUD)

451 7th Street S.W., Washington, DC 20410

Phone in DC: (202) 708-1112 or: www.hud.gov

IFFG's Quality Controls

Complaints will be continually analyzed by the President promptly upon receipt for the identification of systemic or recurring problems. If such problems are identified, IFFG will consider what actions it may need to take to address these problems. The complaints handling process will be reviewed periodically, and at least annually, to aim to enhance its delivery of efficient and effective outcomes. This review will be performed by the President or an appropriate appointee, and IFFG will consider what actions it may need to take to address any deficiencies identified in such a review. Where appropriate, issues that arise as a result of IFFG's complaints handling process may be incorporated in the process for monitoring and evaluating principal, partner, employee or consultant performance, as applicable.

Please contact the President (contact particulars are set forth above) if you have any comments or suggestions in respect of the contents of this Policy.

Disclaimer

This publication contains general information only, and none of Integrity First Financial Group, Inc., ("IFFG") are, by means of this publication, rendering any mortgage brokerage, business, financial, investment, legal, tax, or other professional advice or services. This publication is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect the finances or the business of any Complainant.

Before making any decision or taking any action that may affect a Complainant's finances or business, the Complainant should consult with a qualified professional adviser. IFFG shall not be responsible for any loss whatsoever sustained by any person who relies on this publication.

About IFFG

Integrity First Financial Group, Inc. is National mortgage lender. We provide home loans solutions to clients across the country. For the most updated list of states we lend in please visit our website. Please see www.integritydirectmortgage.com for additional information on IFFG.