



FOOTNOTES

1. Assume seller-carry back loans do not have the requisite program. Send an email to the lender asking:

For the referenced transaction, does the lender have an obligation to maintain an anti-money laundering program and an obligation to report suspicious transactions under Title 31, Chapter X of the Code of Federal Regulations? (yes or no)

2. The settlement agent should confirm with the buyer by requesting a written reply by email to the following question:

Are there any structures designed for occupancy by one to four families on the property being purchased? (yes or no)

Do you, as the buyer, have any intent to build any structure designed for occupancy by one to four families on said property? (yes or no)

If either answer is "YES" proceed, with "YES".

3. Transaction may still be exempt if buyer is a specific type of entity or trust. The authorized signer or trustee must disclose this through the Buyer's RRE Information Request.

NOTE: This information is for your reference only and is not intended to represent the only approach to any particular issue. These guidelines should not be construed as legal, financial or business advice. We recommend you consult your legal counsel and subject-matter experts to determine appropriate policies, procedures and strategies applicable to your office or organization.