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NMLS# 2522067

A BIGGER BETTER MORTGAGE

ANTI-MONEY LAUNDERING STATEMENT

2025



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Policy Statement

It is the policy of the A Bigger Better Mortgage, a Colorado LLC, to comply with the Bank Secrecy Act, the USA PATRIOT Act of 2001, the rules and regulations overseen by the United States Treasury Department's Office of Foreign Assets Control, and other Anti-Money Laundering obligations imposed by federal and other applicable laws. This policy forms an integral part of the Anti-Money Laundering Program, which includes procedures and personnel responsible for complying with this policy and applicable laws.

Reason for Policy/Purpose

The purpose of this policy is to enhance the University's compliance with anti-money laundering laws and regulations, to assist law enforcement in combating illegal money laundering, and to minimize the risk of university resources being used for improper purposes. Failure to comply with anti-money laundering regulations could result in civil and criminal penalties to the University and/or individual employees.

Who Needs to Know This Policy

Persons and/or departments: Management, sales, accounting, and principals of the business

A copy of the Patriot Act is available through our office to all management, sales, and employees.

Policy/Procedures

Money Laundering: is the process of concealing the existence, illegal source, or application of income derived from criminal activity, and the subsequent disguising of the source of that income to make it appear legitimate. To assist the federal government in detecting, preventing and eradicating terrorist financing and terrorist and criminal activity,

Secure Server for Merchant Account

We use a secured hosting service "GoDaddy.com" and a secured merchant account provider who evaluates all financial transactions to the best of their ability and take all necessary steps to comply with anti-money laundering laws and regulations.



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KNOW YOUR CUSTOMER

KYC: Establish a customer's identity and assess their risk factors. KYC requirements are part of a business's anti-money laundering (AML) program to help prevent financial crime and fraud.

Compliance Officer, Due Diligence and Employee Training

Bailey Campbell, President of A Bigger Better Mortgage

Compliance and Due Diligence Procedures

- **Document verification**
- Customers must provide updated, unexpired government-issued identification with a photograph, such as a driver's license, passport, or state-issued ID card.

Customers must also provide proof of address, such as a utility bill or insurance.

- **Biometric authentication: We currently do not have biometric technologies integrated.**

- **Customer due diligence**

As a Financial institution processing and underwriting mortgage loans we must be able to predict a customer's financial transactions by analyzing their past activities and account nature.

Collection of bank statements

The address should be the same as on their loan application. There should be no large cash deposits, we require proof of where the cash came from.

Other income verification

Collection of 2 years W2's if they are a wage earner

Collection of one month's paystubs

Written verification of income from the client's job

If self-employed, we collect bank statements, PFS and P&L for the business, and sometime tax returns depending on the loan type they apply for or if there is a discrepancy in other income documentation.



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Identification

We do this by collecting a copy of their driver's license and social security cards. We also fill out the Patriot Act which is part of our normal disclosure loan package for our consumer loans.

Credit

We pull a tri-merge credit report from Experian, Equifax and TransUnion. We can see if there is a credit freeze, we would then ask them to unfreeze their credit to ensure that they can use the credit and that it belongs to them. The most important red flag on credit is if there is a fraud report.

We can see what alias they may have used, job history, credit profile trends to ensure that the transaction has no suspicious activity.

We can verify that they are using the same birthday, social and address that is common to their credit report.

If we find that there is suspicious activity, such as a wrong social security number or no match to the social security card they provided at application, it would be reported a SARS to the OCC no later than 30 days of the date, FinCEN and the local FBI.

- **Ongoing monitoring**

Financial institutions must monitor customers' activity to identify transactions that are outside of their normal pattern if we are taking mortgage payments or accepting credit cards for those payments. If a different credit card is used, it must match the address, zip code and name. If it is a different name, that person must call in with the account holder and verify who they are in relation to the borrower and give recorded permission for a one-time use of that card. As a mortgage brokerage, we are currently not accepting payments on any mortgage loan, but as we grow, we may add loan servicing to our business.

- **Reporting suspicious activity**

- Financial institutions must have a system in place to detect unusual transactions or behavior patterns that may indicate money laundering or terrorist financing.
- Keep records of cash purchases of negotiable instruments.
- File reports of cash transactions exceeding \$10,000 (daily aggregate amount); and
- Report suspicious activity that might signal criminal activity (e.g., money laundering, tax evasion). Triggers may include applying for a mortgage without providing EIN for their business, tax transcripts are not available mismatch on social security number, name or address.



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Unusual Transactions

Some warning signs of money laundering include:

1. Frequent high-dollar cash transactions (seen on bank statements)
2. Large amounts of cash used when checks would be more convenient
3. Rapid transfers with no explanation
4. Complex or layered transactions
5. Transactions with high-risk countries or industries
6. Transactions that are inconsistent with a customer's source of income or wealth
7. Unusual source of funds
8. Transactions aborted for no clear reasons

Out of Country Clients | Risk and Compliance

We will be using Lexis Nexis for KYC and AML compliance. If we feel that we have not or cannot obtain enough background information locally, we will use Lexis Nexis or IDenfy for those as well.

OFAC reports will be ran <https://sanctionssearch.ofac.treas.gov/>

<https://risk.lexisnexis.com/financial-services/financial-crime-compliance>

<https://www.idenfy.com/>

Both companies offer the following services:

- Global Solutions
- Effortlessly verify Ultimate Beneficial Owners and expand your user base worldwide with our advanced UBO Verification Service. Ensure compliance, reduce risk, and streamline your onboarding process with just one click.
- KYB for business relationships ensures seamless compliance and risk mitigation with Perpetual KYB solution. Continuously monitor company events and verify business credentials in real-time, reducing manual efforts and keeping business secure
- Automated ID verification automatically recognize, verify and extract information from 3000+ identity documents across 200 countries and territories. From passports and ID cards to driving licenses and residence permits, conduct efficient and accurate identity document analysis on a global scale. Advanced biometric and face recognition algorithms ensure that the faces analyzed are real and prevent the use of pictures of faces, 3D masks, and other fakes or renderings in the identity verification process. Three-dimensional face maps can be utilized as bulletproof user authentication and login methods.
- Instant Bank login verification authenticates users in real-time by matching their bank login details with onboarding information.
- Access detailed logs of customer transactions, including dates and amounts, for full transparency.



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- 2,500 plus banks in 29 countries. iDenfy connects to all major European banks with a single integration for streamlined onboarding.
- Scan and monitor your customer through multiple Sanctions, PEPs, and Watchlists. Ongoing AML Screening service finds new suspicion hits every day.
- IP address verification: Proxies are used in 97% of cyber fraud cases. An anonymous IP address (proxy) can be the first clear sign of fraudulent intentions. Whether you are in the process of onboarding a user or doing a transaction, scanning the geolocation of your customer can prevent unwanted losses.
- iDenfy is International Organization Standardization (ISO) certified, General Data Protection Regulation (GDPR) compliant, iDenfy is a Trust Service Provider under eIDAS regulation. This repository also contains the documentation required by applicable eIDAS requirements and ETSI standards. iDenfy TRA Service performs remote unattended identity proof using hybrid manual and automated operation.

<https://www.idenfy.com/security/>

Training for Employees

Employee training is provided through this manual and supervised by overseeing and analyzing applications and processed files before funding.

Basic Red Flags an employee would report to management are the following:

- Large deposits that were not from a normal source of funds on bank statements
- Large cash deposits must be sourced and verified i.e. if it's from a friend or relative account we must see a statement from the sending account showing the amount shown in the receiving account and verify the source of the income from the sending account. Does it look like they can afford to send that amount by looking at the average balance and deposits from the sender and normal income deposits. Though, Fanni Mae does not require "Gift Funds" to be verified, per our current mortgage practices.
- Mismatch name, address, social security number or birthday on application
- If there the applicant does not explain or prove where funds came from or says he'll take his business elsewhere
- Doctored documents (training provided in our annual education and in-house)

Employees are not required to have an account set up with OCC, FinCEN or report to the FBI, our Compliance officer does all the reporting and the employee reports to company compliance.

Anti-Money Laundering and KYC compliance is and has been a part of our continued education, which is mandatory every year as part of our licensing. AML and KYC training and is a big part of the initial loan origination education.



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KYC REFRESH

Currently we are a Brokerage and do not service loans, we only sell them, so we are not required to and do not refresh records however, we do retain funded records for seven years and no funded applications for three years.

HIRING REQUIREMENTS

Employee hiring procedure include a check for all employees, including management, who are involved in the origination of mortgage loans against the U.S. General Services Administration (GSA) excluded Parties List, the HUD Limited Denial of Participation List (LDP List), and the Federal Housing Finance Agency (FHFA) Suspended Counterparty Program (SCP).

All Licensed Loan Originators undergo state and federal fingerprinting and background checks before licensing and required to update every two years.

Concerns concerning irregular or unusually large amounts that appear suspicious, and questions regarding money laundering in general should be directed to A Bigger Better Mortgage. President, Bailey Campbell at: 970-476-5547. Potential violations of this policy should be reported to the Compliance and Privacy Office at 720-722-3101



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Related Information

31 U.S.C. § 5311 *et seq.*, § 5326 and § 5331
31 C.F.R. § 103.11 *et seq.* §103.20-30 and §103.125
USA PATRIOT Act § 314(a)-(b)
Bank Secrecy Act, 12 U.S.C. § 1951, *et seq.*

Compliance officer:

Bailey Campbell 970-476-5547
compliance@abiggerbettermortgage.com

Policy Approved by:

Bailey Campbell: President, A Bigger Better Mortgage