

# KICKBACK CERTIFICATION

(All Employees and Contractors)

As an Employee/Contractor of Senior Freedom Inc. (SFI), I hereby make the following acknowledgments:

I understand that my signature attests to and certifies a full realization on my part that SFI is supervised by government agencies. I further understand that any of my acts will be constructed as acts of this Corporation and will not only jeopardize my position, but as well my fellow employees.

According to RESPA's Affinity Relationships definition of kickbacks: "no person shall give and no person shall accept any fee, kickback, or thing of value pursuant to any agreement or understanding, oral or otherwise, that business incident to or a part of a real estate settlement service involving a federally related mortgage loan shall be referred to any person."

A thing of value as defined by RESPA includes....

*Without limitation, monies, things, discounts, salaries, commissions, fees, duplicate payments of a charge, stock, dividends, distributions of partnership profits, franchise royalties, credits representing monies that may be paid at a future date, the opportunity to participate in a money-making program, retained or increased earnings, increased equity in a parent or subsidiary entity, special bank deposits or accounts, special or unusual banking terms, services of all types at special or free rates, sales or rentals at special prices or rates, lease or rental payments based in whole or in part on the amount of business referred, trips and payment of another person's expenses, or reduction in credit against an existing obligation. The term "payment" is used throughout Secs. 3500.14 and 3500.15 as synonymous with the giving or receiving any "thing of value" and does not require transfer of money.*

1. Under no circumstances will I pay or permit to be paid any fee (including a fee representing all or part of an origination fee), kick-back, or other consideration, directly or indirectly, in connection with an insured mortgage loan, to a broker, packaging personnel, or any other party, if such person or entity has received or is to receive, any other payment or consideration for services related to the transaction. Additionally, I understand that no compensation may be paid as a "finder's fee" or for referral of the loan (see exception for lead purchases from a company in the business of providing leads to mortgage professionals).
2. In addition, I understand that SFI and I, as an employee, are not permitted to pay any fee, advanced funds, kick-back or other consideration to a real estate broker, real estate agent, builder, consultant, mortgage broker, packaging personnel or any other party associated with a real estate transaction.
3. I further understand that SFI and I are not permitted to pay any fee, kick-back or other consideration to a consultant that provides assistance to a loan transaction..
4. I further understand that SFI and I are not permitted to advance funds to a real estate broker, real estate agent, mortgage broker or packaging personnel in connection with appraisals or as an advance or anticipated commission or sale.
5. A payment made in advance to a company that is engaged in the business of providing customer leads that is not in any way tied to the successful closing of a loan is not considered a kickback.

I fully understand that any violation of any of the above regulations shall subject me to immediate removal from my position with SFI and expose me to prosecution both civil and criminal by the COMPANY. I also understand that I am obligated to immediately report any violations of the above regulations that I may observe.

\_\_\_\_\_  
Originator Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name