



www.BorrowSmartCompliance.com



WHAT.....

COMPLIANCE!

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WHY.....

- On 1/19/12 Our World Changed
- Entirely New Lending Universe
- CFPB Is IRS On Steroids
- Exam Manual
- **Sustainability**
- UDAAP

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CFPB DIRECTOR...

- Businesses Need To Understand
- Treat Customers Fairly
- Sustainable
- Exam With Consumer Focus
- Unfair & Deceptive
- ***ENFORCE THE LAW!***

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WHAT.....

COMPLIANCE

SYSTEM!

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WHAT.....

- **Compliance Support System**
- **Policy & Procedure Products**
- **E-Learning Web Platform**
- **Training & Communications**

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WHAT.....

*Shared Compliance
Resources For Member
Companies*

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WHAT.....

*Managed By Borrow Smart
In Partnership With Other
State Associations*

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PARTS.....

- **Manuals**
- **Web Compliance Platform System**
- **Training, Support & Communications**
- **Consultation When Needed**

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PARTS.....

***See Description In CFPB
Exam Manual***

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PARTS.....

- **Truth In Lending Act/Reg Z**
- **Equal Credit Opportunity Act/ Reg B**
- **Electronic Fund Transfer Act/ Reg E**
- **Fair Debt Collection Practice Act**
- **Fair Credit Reporting Act**

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PARTS.....

- **Gramm-Leach-Bliley Act**
- **Third Party Relationships**
- **Vendor Management**
- **Other Risk To Consumers**
- **Sustained Use**

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PARTS.....

*Other New Rules Soon To
Be Promulgated*

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LIKE.....

*In Some Respect Similar
to ABA & Bankers Edge
Programs*

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HOW.....

*A Web Based Service
Available To All
Association Members*

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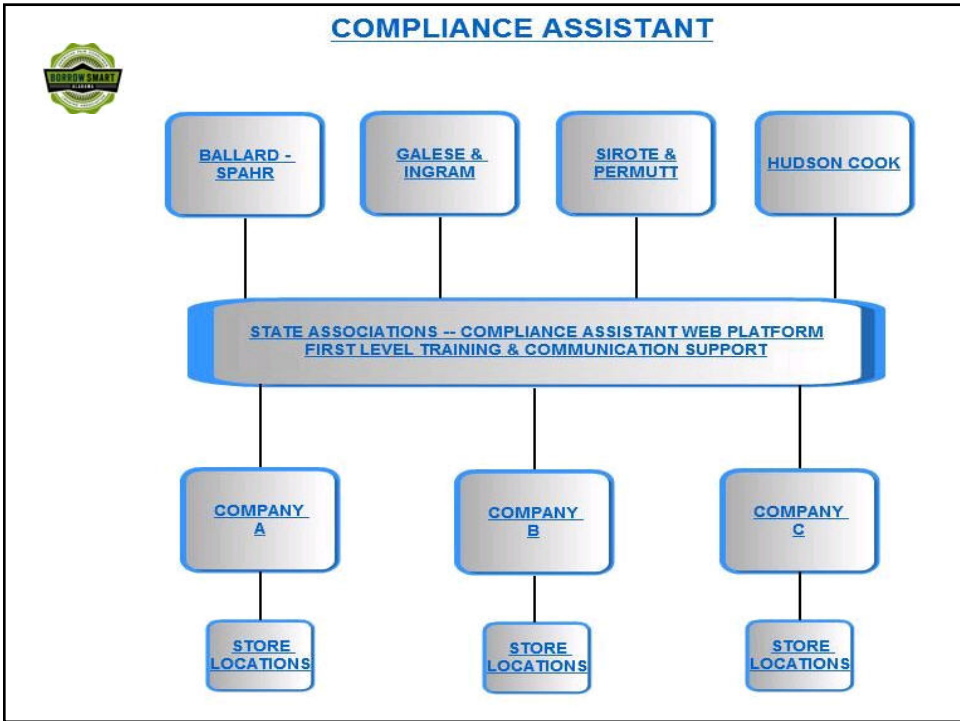
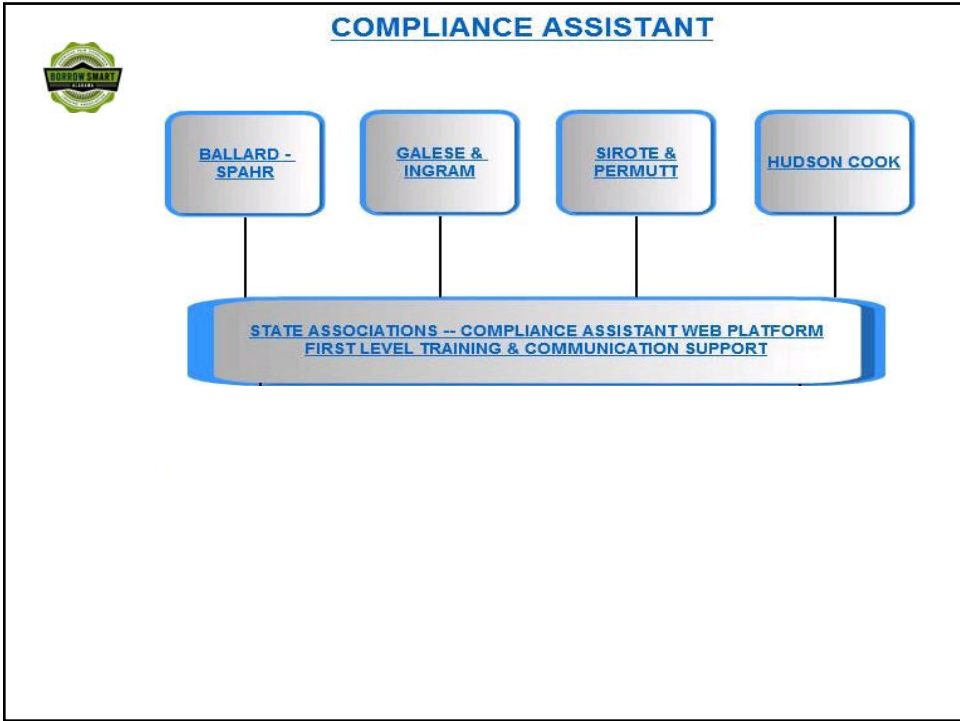
COMPLIANCE ASSISTANT

BALLARD -
SPAHR

GALESE &
INGRAM

SIROTE &
PERMUTT

HUDSON COOK





HOW.....

- **Members Select Service & Firm**
- **Compliance For Federal & State**
- **Materials Delivered To Store Via Web**
- **Training & Testing Via Internet**

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HOW.....

- **A List Of Core Products Offered**
- **Members Pay One Time Fee & Monthly Support Per Location**
- **Direct Compliance Support By Firms As Needed**

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HOW MUCH.....

Preliminary

SUMMARY CLIENT/CUSTOMER COST					
STORE COUNT		CFPB FED EXAM MANUALS & SETUP	MONTHLY SUPPORT, TRAINING AND DISTRIBUTION PER MO	PER STORE	
FROM	TO			SETUP	MONTHLY
0	4	\$3,900	\$269	\$975	\$67
5	10	\$4,500	\$644	\$450	\$64
11	20	\$5,900	\$1,237	\$295	\$62
21	30	\$6,900	\$1,802	\$230	\$60
31	50	\$8,900	\$2,704	\$178	\$54
51	100	\$10,500	\$4,396	\$105	\$44
101	200	\$12,500	\$6,833	\$63	\$34
201	300	\$13,250	\$8,538	\$44	\$28

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HOW MUCH.....

What We Need.....

To Launch: *About 10 to 15 companies*

To Maintain: *25 to 30 companies*

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BENEFITS.....

- **Safety In Numbers**
- **Shared Cost**
- **Best Available Support**
- **Affordable**

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WHAT.....

COMPLIANCE!

An Overview

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WHAT.....

Today:

The Best!

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WHAT.....

Next Step:

You Tell Us.

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WHAT.....

Thank You..

All!

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