



Vetting

Condition #4503



CITADEL
SERVICING CORPORATION



Vetting Process

The CFBP (Consumer Financial Protection Bureau) expects supervised banks and “non-banks” to have an effective process for managing the risk of service provider relationships.

Closing Agents, who are not a Major Title Company, or listed on CSC’s Funding Log must be registered with Secure Insight.

CSC utilizes Secure Insight, a third party closing professional verification service to vet closing professionals. It maintains a national database of bank approved closing agents.

Secure Insight has established evaluation criteria, verified independently through public and private databases.

- ❖ Closing Agents can use CIDL199 code to waive the registration fee
- ❖ Approval process is not an overnight event and can delay closing
- ❖ 7 – 10 business day processing time



The Title Insurance Underwriter who issued the Closing Protection Letter (CPL) DOES NOT automatically qualify the Settlement/Closing Agent as being a MAJOR TITLE COMPANY.

You must review the “WIRING INSTRUCTIONS” to determine how vetting will be satisfied.

The Settlement Closing Agent listed on the CPL must match the info reflected on the wiring instructions.



c/o ATFS: 6545 Corporate Centre Blvd. • Orlando, Florida 32822
Toll Free Phone: 1.800.432.9594 x7385
Toll Free Fax: 1.800.929.5554
Email: cplrequest@thefund.com

Closing Protection Letter • Single Transaction

Tuesday, June 05, 2018 – Reference Number: 963549543

Citadel Servicing Corporation
its successors and/or assigns
Loan Closing Department
15707 Rockfield Blvd.
Suite 320
Irvine, CA 92618-2830

Loan Reference: 7014276

Transaction (the "Real Estate Transaction"): Sergio Candido and Agostina Morgante Giuliani

Premise to be covered: 3401 N Country Club Dr #317 Aventura FL 33180

Name of Issuing Agent or Approved Attorney (the "Issuing Agent" or "Approved Attorney", as the case may require):

ORNT AGENT NUMBER: V09097 / FUND MEMBER NUMBER: 39615-01

PHOENIX LAND & TITLE LLC
3837 HOLLYWOOD BOULEVARD
SUITE A
HOLLYWOOD FL 33021-0000

To verify if this agent is in good standing go to www.oldrepublictitle.com, select Agent Verification from the Products and Services dropdown and enter the ORNT Agent Number or Reference Number listed above

Identify “Who” CSC is Wiring Funds to

1) Is the Settlement/Closing Agent listed on the MAJOR TITLE COMPANIES list?

If “Yes” no additional vetting requirements apply.

If “No” go to step 2.

2) Is the Settlement/Closing Agent listed on the CSC Funding Log?

If “Yes” and all info matches the log and the approval date is not expired, no additional vetting requirements apply.

IF items 1 or 2 do not apply, the Settlement/Closing Agent MUST be registered with Secure Insight and have a LOW RISK rating.

PHOENIX LAND & TITLE LLC

(954) 334-7600 telephone
(954) 334-7755 facsimile
Evan@Plotkalaw.com

Presidential Financial Center
3837 Hollywood Boulevard
Suite A
Hollywood, Florida 33021

WIRING INSTRUCTIONS

Routing# (ABA #): 061000104

Account #: 1000197115388

Account Name: Phoenix Land & Title LLC Escrow Account

Bank Name: SunTrust Bank
Hollywood, Florida

E-mail Address: Ken@Plotkalaw.com

Swift Code:

Title Order No.: 205-718

Borrowers: Sergio Candido and Agostina Morgante Giuliani

Subject: 3401 N Country Club Dr #317, Aventura, FL 33180

Review the “WIRING INSTRUCTIONS” to determine WHO the Settlement/Closing Agent receiving funds will be.



Major Titles Companies

- Attorney's Title Insurance
- Chicago Title Insurance Company
- Commonwealth Land Title Co
- DHI Title
- Fidelity National Title Company
- First American Title Insurance Company
- Investors Title Company
- LandAmerican Title Company
- Lawyers Title Company
- North American Title Insurance Co
- Old Republic Title Company
- Orange Coast Title Company
- Republic Title of Texas, Inc.
- ServiceLink
- Stewart Title Company
- Ticor Title Insurance Company
- Title Resource Guaranty Company (TRG)
- Westcor Land Title Company
- WFG National Title Insurance Company



CSC Funding Log – “In House Vetting”

Internal Ops staff will utilize the CSC Funding Log AFTER it is determined that the closing agent is NOT a Major Title Company. The CSC Funding Log contains closing agent’s that have been approved ‘In House’ by CSC. The CSC Funding Log is issued by Funding Management at the end of each business day. Internal Ops staff should contact your supervisor if you are not receiving the funding log on a daily basis.

You must be sure that you are reviewing the most recent list of closing agents to verify the current status of IN HOUSE VETTING approval.

From: Veronica Tillis
Sent: Friday, June 8, 2018 5:51 PM

Subject: FUNDING LOG

06/08/18 as of 5:50 pm

Comparison Report

		Work Days	Days Until	Funded Loans		Funding Portfolio	
		into Month	Month End	Qty	Dollar amount	Qty	Dollar amount
This Month 21 Working Days	06/08/2018	6	15	58	\$ 21,714,472	83	\$ 32,250,950
Last Month 22 Working Days	05/09/2018	7	15	60	\$ 21,607,320	73	\$ 26,032,450

Loans funded today

Lu	261,000.00
Lu	100,000.00



In-house vetting continued

- Open the Excel Spreadsheet and **Select the APPROVED CLOSING AGENT'S TAB**
- Locate the Settlement/Closing Agent that funds will be WIRED TO as listed on the WIRE INSTRUCTIONS
- Follow Vetting Review Checklist to determine if the closing agent on the WIRE INSTRUCTIONS/CPL is the same as the closing agent on the CSC FUNDING LOG.

117	Equity Title Agency, Inc. - AZ	12/31/2017	7975 N. Hayden Ste C280, Scottsdale, AZ 85258		Owned by Orange Coast Title
118	Equity Title Company	12/17/2018	450 Exchange, STE 200, Irvine, CA 92602	714-972-4200	Owned by TRG
119	Equity Title Company	12/17/2018	123 Camino de La Reina, Ste 100 W, San Diego, CA		Owned by TRG
120	Equity Title Company	12/17/2018	801 N Brand Blvd, Ste 400, Glendale, CA 91203		Owned by TRG
121	Equity Title Company	12/17/2018	7095 Indiana Avenue, Riverside, CA 92506		Owned by TRG
122	Equity Title of Nevada	12/31/2018	10777 W. Twain Ave #105, Las Vegas, NV		
123	Equity Title of Nevada	12/31/2018	2475 Village View Drive, #250, Henderson, NV		
124	Express Title Solutions Inc. dba New Urban Title	3/30/2016	298 Pineapple Grove Way, Del Ray Beach, FL	561-819-6211	
125	Fair Land Title Company	6/1/2017	5160 Village Creek Drive, Suite 200, Plano TX 75093		E&O exp. 06/01/17

Always scroll to the bottom to identify if a closing agent is NOT eligible to close with CSC.

REMOVED CLOSING AGENTS / NO LONGER APPROVED BY CSC				
Trident Title, LLC		501 S. Flagler Drive, Suite 201, West Palm Beach, FL	561-515-2921	Tammy Gisclair
Web-Title Company		661 Pennsylvania Street, Denver, CO		



Secure Insight Registration

The TM Lead/Supervisor will upload a Secure Insight Registration to DV if the closing agent is approved with a LOW RISK rating and all company vetted info matches the CPL and Wiring Instructions provided.

UW should NOT clear COND #4503 without verifying that the closing agent meets one of the following:

- 1) Closing Agent receiving funds is a MAJOR TITLE COMPANY, as reflected on the “WIRING” instructions
- 2) Closing Agent/branch location is listed as an approved agent on the CSC Funding Log
- 3) SI Registration in DV, validated by TM Lead and matches CPL/WIRE

Registration No. 539856 Plotka, Evan		Vetting Level: Full (Company Full + Individual Full)	
Secure Insight Risk Rating Low Risk		Agent Performance (Lender Reviews) 0 Review(s)	
Secure Insight Registration Expiration Date:		02/15/2019	
Secure Insight Status:		Completed	
Watch Status:		No	
Entity		52437297	
Business Name	Business Address	Business Phone	
Phoenix Land & Title, LLC	3837 Hollywood Boulevard Suite A Hollywood, FL 33021	954-334-7600	
LICENSE(S)			
State (Business)			
FL			
Business	W275071	Title Company	FL
State (Individual)			
FL			
Individual	5540	Attorney	FL
Individual	689108	Notary	FL
Vetting Level			
Full (Company Full + Individual Full)		☒	
Partial (Company Full + Individual Partial)		☐	
Limited (Title Underwriters)		☐	
Click UPGRADE to request closing agent undergo further vetting		Upgrade	Upgrade not applicable.
Role:		Funding and Docs	
Watch Source:		N/A	
Secure Insight Reason (s):			
Expired Item(s): None			
Next Expiration Date:		E&O Insurance	04/08/2019
		FB Insurance	10/15/2018
		Attorney FL	06/30/2018
		Title Company FL	10/31/2019
E&O Insurance Limit:		\$ 1,000,000	
Fidelity Limit:		\$ 50,000	
Receiving ABA #		Account #	
061000104		1000197115388	

SI Code Exceptions

- All SI Code Exceptions must be resolved prior to vetting clearance
- Clarification for the SI code may require additional documentation to be provided by Secure Insight. *(Examples shown below)*
- Final SI Code review/approval is handled by our Vendor Management Department.

Secure Insight Reason Codes

Numeric Value	Risk Reason
100	Personal Information
101	Failed or refused to give correct credentials
102	Failed to renew Secure Insight Registration
103	Closing Agent No Longer With The Company
104	Company No Longer In Business
105	Failed to return required documents
106 range (106.1a to 106.3)	Failed to Identify Certain Adequate Internal Controls (see SI Internal Controls Letter By Clicking this Link)
106.99	Provided Third Party Evidence in Lieu of SI Internal Controls Letter
107	Application Cancelled/Withdrawn/Data Expired

The TM Lead or TM Supervisor will provide feedback to the AE/TM identifying whether or not the closing agent is vetted with Secure Insight. The communication will also identify if there are any corrective actions that the closing agent needs to take to update their registration. Vetting review is documented by the TM Lead/Supervisor on the conversation log.

Jeremy Abbott

From: Trudy Barton
Sent: Wednesday, June 6, 2018 9:45 AM
To: Julie Le; Jose Gonzalez
Cc: Trudy Barton; Stephanie Ponce
Subject: VETTING #7014276 Candido, Sergio;

File name: 7014276

Phoenix Land & Title, LLC - Registration #539856 - Acct Ending #5388 - closing agent is approved with a LOW RISK RATING with SI

NOTE: EXPIRES 06/30/18

Secure Insight Registration

The online application may be accessed at www.secureinsight.com. Closing Agents may contact Secure Insight at (877) 758-7878 for customer support.

When registering, a Closing Agent should use the Promo Code CIDL199 to waive cost of registration.

The processing turn time is 7 to 10 business days once all required items have been submitted to Secure Insight. Incomplete applications or an agent's failure to provide required items will extend the processing time.

A file may not be moved to the closing department until all vetting requirements have been satisfied.