



COMPLIANCE ATTESTATION & CERTIFICATION

In compliance with the loan originator compensation rules under the Truth in Lending Act (TILA), _____ who is an approved broker with First Capital Bank (lender) attests to the following:

- Neither the broker nor any other party has paid compensation to any loan originator in an amount that is based on a term or condition of the loan.
- No borrower(s) have been steered to a product or program based on the basis of increased loan compensation for the originator.
- All applicable loan originators have a compensation agreement in compliance with TILA Compensation Rules.
- All loan records and supporting documentation are retained as required by the TILA Compensation Rules.
- All applicable employees involved in submission of loans to First Capital Bank have read the appropriate federal regulations as well as any related First Capital Bank communications associated with TILA LO Compensation. Applicable employees understand the requirements set forth in the document(s).
- Broker has general controls to ensure compliance with TILA Compensation Rules which may include but not be limited to:
 - Documented Policies and Procedures
 - Executed Compensation Plans
 - Employee Training
 - Quality Assurance Plans
 - Internal Audits
 - Compliance Testing

First Capital Bank may require documentation of controls from the Broker. Broker will provide the documentation as set forth in the Broker Agreement.

Date: _____

NMLS Company ID: _____

Authorized Signer: _____

Signature: _____
Authorized Signer must match Corporate Resolution or Secretary Certificate provided at approval