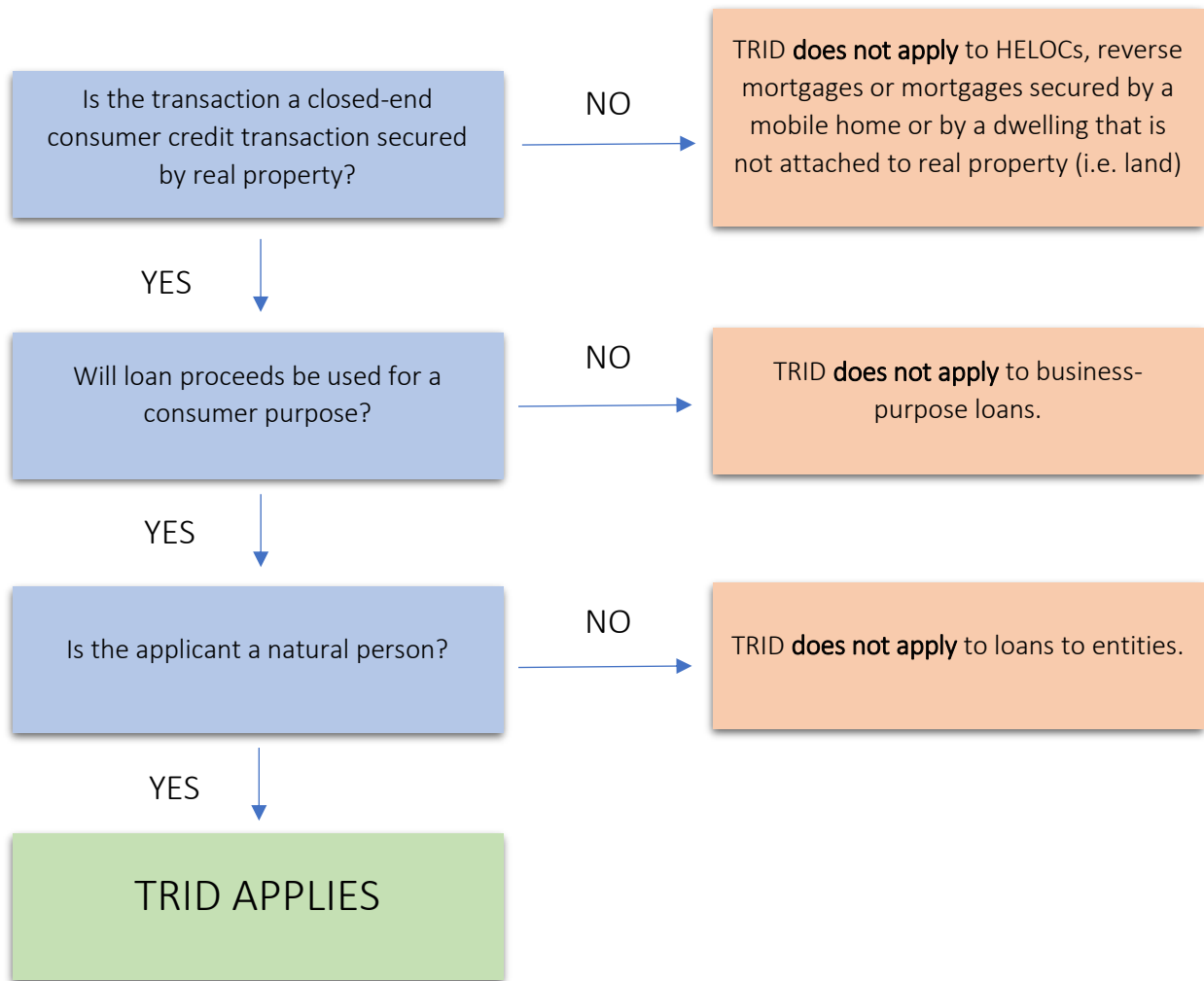


TRID APPLICABILITY

The following flowchart was developed to assist real estate lending staff to determine when TILA-RESPA Integrated Disclosures would be required. It is not intended to be all-inclusive or definitive; the flowchart is simply a guide to the key questions that should be considered to determine TRID applicability.



REMEMBER

TRID applies to construction-only loans and loans secured by vacant land or by 25 or more acres. Credit extended to certain trusts for tax or estate planning purposes are also covered by TRID.

Investment Properties: The rules regarding applicability of TILA and RESPA to investment properties have not changed. If a property is purchased for “business purpose” and applicant does not intend to live in the dwelling for more than 14 days in the coming year, TRID does not apply. However, if the applicant took cash out of an investment property to pay a child’s tuition, for example, the purpose of the proceeds is a consumer purpose and as such, TRID would apply.