

COMPLIANCE REVIEW DOCUMENT

For Dovetail MKTG (dba Mortgage Growth System)

*Please direct all compliance questions to Brandon Robertson (CEO) at
vip@dovetailmktg.com*

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Summary

This document outlines the basics of what we do, how we do it and the guidelines we follow to maintain compliance within the mortgage industry.

Who We Are

We are a marketing agency that specializes in marketing for Mortgage Loan Officers and Mortgage Companies. We are currently an approved vendor with nearly 20 companies and have been operating in this space since late 2016. The CEO is Brandon Robertson and our headquarters are located in the Indianapolis suburb, Franklin Indiana.

Company Address: 249 E. Jefferson St #159, Franklin, IN 46131

Our Programs

We essentially offer two primary variations of services:

- Done for you services – where we do all the work and manage the digital/online advertising and marketing
- Training & consulting – where we teach individuals how to do what we do for themselves.

Typically, any in-depth compliance review or vendor approval process is reserved for individuals, branches or companies who choose to use our done-for-you services. We refer to these individuals/companies that hire us for done-for-you services as 'Clients'.

Those who choose to use our training and consulting services are called 'Students'. Students are ultimately in control of everything that happens and the marketing, not us. We are only providing information, education, strategies and techniques, NOT

doing the work and typically do not go through a compliance review process with them.

How We Work With You

- **Done-For-You:** We are not licensed brokers/loan officers – we do not have an NMLS number and do not need one. We are NOT lead sellers, we are a marketing agency that operates invisibly to the consumers you will be marketing to. We always do the marketing on your behalf, using your brand(s), name(s), and legal information in the marketing materials.
- **Training & Consulting (Done-With-You):** We provide live and online training information including, but not limited to, strategies, templates, proven advertisements, and more. The ‘Students’ of these programs ultimately select what they want to use or not use and modify as needed. Students are expected to handle their own compliance reviews internally.

Our Process

The best resource for understanding our process of marketing and lead generation can be seen on our homepage located here:

<https://www.mortgagegrowthsystem.com/>

On that page you’ll find a demo video. They’re very similar and you probably only need to see one to understand what we’re doing.

However, here is an overview.

We primarily use the Facebook advertising platform for online advertisements. Facebook’s advertising platform has several sub-platforms (or channels), including Facebook, Instagram, Audience Network, Whatsapp and Facebook Messenger. We typically use all of them.

Some clients may select a package where we use an additional platform called Adroll. This platform allows us to retarget (or remarket) consumers across multiple advertisement platforms including, but not limited to, the Google Display Network, Youtube, Linkedin, Yahoo Finance and many others.

Advertisements are always published under the individual, branch or company branding and/or name. Our company and services are not made visible to the consumer.

Advertisements always encourage the consumers to start the pre-qualification process for purchase and/or refinancing services.

Advertisements direct consumers to landing pages where the consumer will fill out a questionnaire outlining their desired intent.

Once a consumer completes the questionnaire, that consumer data is passed on to a CRM we assist our clients in using. In most cases this is a CRM (called Agentgogo) that we set up, educate the LO on and provide the communication content for. We can bypass this step and directly integrate with most CRMs or do both simultaneously. Our recommended CRM (Agentgogo) meets typical communication compliance standards for this and most industries including the option for easily opting out of email and text communications. This CRM communicates via email, text, video and voicemail drops. It does not make outbound phone calls automatically (or robo-dials). We do not provide nor set up voicemail drops. The LO would have to set those up themselves. We also do not provide nor set up video communications. The LO would have to implement that if they so choose - creating their own videos they'd have compliance review themselves. They can also just not use voicemail drops or videos (most LOs do not use either component).

Everything we do is modifiable to meet compliance standards. By 'everything' we mean, the ad verbiage, landing page content and verbiage, questionnaires (including the questions and selectable answers within them) and CRM automations. Landing pages can include any disclaimer, legal language, images, logos and web links as required or requested.

Most companies agree that since the lead is voluntarily submitting their information they have agreed to communications. However, disclaimers with 'consent to communicate' language are already always added to landing page text where the consumer enters their information. This information can be modified to anything the LO/Company provides.

Here's a video on why we have most clients use our recommended CRM system:

▶ [Our Secret To Mortgage Lead Conversion \(And why we encourage clients to use ...](#)

Notes On Compliance

- Leads are not scrubbed for correct information nor scrubbed against the do not call list since the consumer has elected to provide their own information to be contacted.
- All information provided by the consumer is self-reported data. There are no soft or hard credit pulls being performed.
- We are NOT collecting sensitive or personal information such as social security numbers – all questions are general questions about the consumers timing, what they are wanting to do (example: buy a home of ____ value in ____ location in ____ timeline), what they believe their credit situation is, income is and the like.
- We never make promises to lend NOR mention rates the consumer will receive.

- We do NOT provide an online application and/or 1003. We may use one that the client has/provides in advertisements in some circumstances.
- We do not have a Data Security or similar policy (such as an SSAE-16) since we are not storing or collecting sensitive information
- We do not have a Consumer Complaint Policy since we are not lead aggregators and are not selling leads

Disclaimers / Legal Language / Privacy Policies

The only standardized legal / policy information we typically include on landing pages are as follows:

By submitting your phone number you are providing express written consent for us and our affiliates, agents, and service providers to contact you at the email provided as well as the number provided regarding products or services, including via autodialed and/or prerecorded or artificial voice calls and texts and that this consent will persist indefinitely until you request a cease in contact which can be made by phone, email or text. You may opt out of text messages or email at any time by reply with the word STOP.

Additional or alternate language can be provided by the LO or Mortgage Company (if they are in the done-for-you program) or placed into the landing pages, ads or Facebook pages by the client themselves if using our done-with-you programs.

In most cases, LOs and companies provide the same or similar information they have on their websites for disclaimers and legal language.

Facebook Advertisements

Ads must run from a Facebook Business Page (per Facebook). As an agency, when providing done-for-you services, we gain Admin access to the Facebook Page that ads will run from. All ads will appear as sponsored posts from that page. If a client of ours does not have a page, we can create one for the client. Optionally, we can also gain access to a Facebook Ad Account or Business manager if the client has one and run ads from those accounts. In most cases we run ads from our own internal Facebook and/or Adroll ad accounts.

Purchase (home buyer) advertisements always include as an image a home or a home with interior shots and sometimes include images that have text on them that would be the same text as already approved as a 'headline'.

Ads also always have typical 'post text'

Note: *Company logos and/or EHL logos can be overlaid on images, although most companies generally agree this is unnecessary since the Facebook page and landing pages already have this same info. We recommend*

avoiding doing this when possible as it actually negatively impacts ad performance.

Facebook Compliance With Fair Lending

We have two videos related to that here:

Targeting/Redlining: <https://youtu.be/Z9HPPf6SZ4o>

Our General Practices: <https://youtu.be/hXtYhizUqe4>



Mortgage Corp.
Sponsored · 

... 

Need money to buy a dream home? My 60-second process makes it easy.

...See more



With Rent So High, Why Not Buy Instead?

Get quote

 Like  Comment  Share



Mortgage Corp.

Sponsored · 🌐



Smart renters know the math on renting vs buying, and owning a home is always the better option. Here's why... [...See more](#)



**Could Buying Be
More Affordable
Than Renting?**

Take The 60-Sec
Quiz To Find Out

**Need Home-Buying
Money? Get Started In...**

[Learn more](#)



Like



Comment



Share



Chris [redacted] 86

Sponsored · 🌐



As affordable as it is to own a home in comparison to renting, I had to make sure everyone knew why. ...See more



Could Buying Be More Affordable Than Renting?

Take The 60-Sec Quiz To Find Out

ti [redacted] m

Why High Rent Costs May Mean Buying Is Smarter

[Learn more](#)



Like



Comment



Share



F [redacted]
[redacted], Sr. ... X
Loan Officer
Sponsored · 🌐

Fire your landlord and buy a home instead.
Buying a home is simpler and more affordable
than most renters think...

And finding out what's possible for you is easy
too.

Just click the link below to begin qualifying and
make the comparison in a few seconds.



v [redacted]

(Qualifying typically requires credit scores in the
mid-600's and up, a steady source of income
and some money down.)



[redacted]
**Need Home-Buying
Money? Get Started In...**

[Learn more](#)



Like



Comment



Share



If images like this are used they would be the same headlines already approved for the ad text

How To Buy A Home The More Affordable Way

Take The 60-Sec Quiz To Find Out

Refinance ads are similar, but images are typically different as seen in the example below:



Financial, LLC

Sponsored

ID: 942582939498554

Primary body text

Here's 1 Simple Tip Homeowners Can't Ignore (and it could save them \$100's)! But... good things never last. Recent changes in mortgage rates are pretty big. In fact they're at all time lows. And that means homeowners who act fast could save \$100-\$500 per month or... \$10-50k over the lifetime of their loans ..especially if they have a rate of 3.5% or higher. Want to know if refinancing now while the rates are still super low will make sense? Just take our 60-second quiz to find out: 🏠
www.gety...refi-haf Many homeowners are refinancing to - reduc...



Image



GET...COM

Homeowner Advice That Can't Be Ignored
Find out what you could save in 30-seconds

Headline

Learn More

If doing a thorough compliance review, we will provide multiple images, primary body text options and headline options to review.

Landing Pages

Landing pages are made of an initial page that the consumer would go to if they click on the ad itself. You can see a sample template below. As with anything in our process, images and text on the landing pages can be changed or modified to suit your needs and we can put in anything you request and/or provide.



MY MORTGAGE CO.
NMLS ID #2645611

Betty Boop
nmls # 5551234
Mortgage Banker

Click Here To
Call or Text



Client's info & company
info goes here

Questions? Click To Call or Text: 317.555.5555

Want To Fire Your Landlord And Buy Your Own Home Instead?

Begin Qualifying For A Mortgage In 60-Seconds



Lead capture form is
embedded here

Client's CRM phone number
goes here

By submitting your phone number you are providing express written consent for us and our affiliates, agents, partners, and service providers to contact you at the email provided as well as the number provided regarding products or services, including via autodialed and/or prerecorded or artificial voice calls and texts and that this consent will continue indefinitely until you request a cease in contact which can be made by phone, email or text. You may opt out of text messages or email at any time by replying with the word STOP.

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(www.nmlsconsumeraccess.org). We are an approved equal housing lender. This page last updated on 01/01/2022.



Legal information goes here and is provided by client
or pulled from their website if not provided.

“Thank You Pages” are the pages that a consumer would see after completing the questionnaire. Two examples are provided below:

The first one here, is what a lead would see for a thank you page if they passed the Client's / MLO's qualification parameters.

Congrats! It appears you may qualify to buy a home fairly simply.

So let's find out how much money can we get you!

Please schedule a no-obligation, consultation now so I can get an idea on what your goals are & give you the *Next Steps* to get there.



Click To Schedule A Call

If you don't schedule a call I'll text or call you from **555.555.5555** to see how I can be of assistance.

Lead can message

Client through their Facebook page here.



Click To Message On FB

Client's CRM phone number goes here



Jane Doe Team - NMLS#123456 ← Client's actual info goes here

I look forward to getting to know you, understanding your needs, goals and dreams, and making it all happen quicker! Let's talk soon.

Automated booking calendar is embedded here.

Legal info is on landing page already but can also be put at bottom of this page.

The second page here, is what a lead would see for a thank you page if they DID NOT pass the Client's / MLO's qualification parameters and are automatically deemed not currently qualified.

We Got Your Information!

Based on your initial answers, it does appear as there may be some challenges in getting you qualified for a mortgage immediately.

But please respond when I or my team reaches out, so we can identify what steps need to be taken to help you reach your home finance goals as quickly as possible.

 [Click To Message On FB](#)



Jane Doe Team - NMLS#123456

I look forward to getting to know you, understanding your needs, goals and dreams, and making it all happen quicker! Let's talk soon.

No booking calendar option is offered to Lead on this page.

All the same aspects as the other thank-you page are available here.

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Flowchart:

The flowchart below shows the process of ads, to landing pages to CRM and how it all ties together.

(Please note the longform questionnaire/quiz is on/embedded within the Landing Page and essentially part of it. The contact/lead/visitor will see the landing page and form as one whole, not two parts. They are only 'two parts' from a technical perspective.)

You'll be
advertised on



Landing page

Lead sees who you are again, is reminded of offer (from the ad) and fills out the long form to provide you with their information.

Thank you page

Lead gets confirmation you got their information, is instructed on what will happen next, sees your name and information again and is invited to book a call with you (if you are using the calendar system).

If they book a call

You will get reminders from the booking system, a calendar event will go on your calendar and the lead will also get several email and text reminders of the appointment.

Automations

Backend automations pull the information from a form and push all of that to the CRM and (if you're a client) shoots the information into a live (Google) spreadsheet where you can always see all of your leads from a "bird's eye view".

CRM

The lead is now in the CRM along with all of their contact information and long form information

Notifications to you

The CRM will also notify you of a new lead by text and email. (If you need special notifications to other people, those can be setup as well.)

Automated communication with leads

The lead gets a text almost instantly, an email a few minutes later, and another text \pm 30 minutes after that (on the first day).

Automations continue for about a month and hit the lead every day for the first week then begin to get more and more spaced out the further into the month the automations go.

What's next - what should you do?

Some people like to call the leads immediately, others like to let the automations do the work and wait for a lead to respond. Either is fine, but you may want to experiment with both approaches to find the one that suits you. **But you should absolutely try calling the lead within 24 hours if not sooner if they didn't already respond or book a call.**

If a lead responds to you by text, the automations will stop and you will need to continue with the follow-up manually or put them into a new automation.

Automated Drip Campaigns

Our automated drip campaigns happen through the 3rd party CRM called Agentgogo. We use specific campaigns that we've created for our clients and students. This system can send emails and texts automatically. They can also send videos, although if a video were to be used, the LO themselves would set that up. We

do not provide pre-created videos (it wouldn't make sense because it needs to be personalized).

Text and email campaigns can be modified just like everything else to suit the needs of the LO/Company. However our initial, automated campaigns that begin firing off are very general and for the most part are really just asking the lead when they can talk and what their financing goals are. There's no specific details, rates, offers or anything of the like. The primary goal is just to get communications started and to get the lead on the phone.

There are only 3 types of campaigns that are automatically launched. One is to connect with buyers, the other is to connect with refi clients and the other is if someone does not appear as though they will qualify for a loan currently. That last campaign is where the automations simply let them know that based on the answers that person (the lead) provided, it doesn't look like they could qualify and requests to know more about their specific situation to see if anything can be done for them.

We can provide these campaigns by request.

The links below will also allow you to see our typical quiz/questionnaire questions that we use (which are also modifiable to whatever you need).

Example Home Buyer Form: <https://form.jotform.com/222007269556457>

Example Non-QM Form: <https://form.jotform.com/222007354612445>

Compliance Review Requirements

Please note: Due to the often lengthy process and large amount of work required for full vendor approval, we require a \$1000 non-refundable deposit.

If this document is sufficient for approval, we do not need to collect the deposit.

We can provide w-9's by request as well as other company or pertinent information, however this is NOT necessary when invoices are paid through online credit card payment platforms unless other arrangements have been made to pay by ACH or check.

We will issue an invoice for the compliance review when appropriate.

Payments

Payments are typically collected ACH, credit card online or over the phone. We can also take payment by check via mail.

We do not initiate work until payment is completed. We do NOT offer net terms on payment.

We do NOT engage in revenue share compensation arrangements.