A sample review of the Licensee's closed loan files revealed 19 instances in which New England Merchants collected fees which were not properly disclosed, in writing, prior to loan closing. The loan transactions are identified below:

| Borrower | Fees Paid on HUD | Fees Disclosed on GFE, LOCA and Attorney General's Disclosure | Reimbursable Amount |
| :---: | :---: | :---: | :---: |
| 837445 | Total Fees to NEM \$2,495.00 | No disclosures issued prior to settlement | \$2,495.00 |
| 845525 | Total Fees to NEM $\$ 995.00$ | No disclosures issued prior to settlement | \$995.00 |
| 141047871 | Total Fees to NEM $\$ 3,495.00$ | No disclosures issued prior to settlement | \$3,495.00 |
| 0000918914 | Total Fees to NEM \$2,095.00 | No disclosures issued prior to settlement | \$2,095.00 |
| 6527514-7923 | Total Fees to NEM \$10,125.00 | No disclosures issued prior to settlement | \$10,125.00 |
| 111515070 | Total Fees to NEM \$3,550.00 | No disclosures issued prior to settlement | \$3,550.00 |
| 6581546 | Application Fee $\$ 250.00$ | Application Fee $\$ 150.00$ | \$100.00 |
| 1010045183 | Total Fees to NEM \$4,013.00 | No disclosures issued prior to settlement | \$4,013.00 |
| 04-2822323 | Broker Fee $\$ 8,275.00$ | Broker Fee $\$ 8,000.00$ | \$275.00 |
| 132514531 | Total Fees to NEM \$1,895.50 | No disclosures issued prior to settlement | \$1,895.50 |
| NEMCBRO0602000333 | Total Fees to NEM \$6,775.00 | No disclosures issued prior to settlement | \$6,775.00 |
| 26040134 | Mortgage Broker Fee \$3,950 | Mortgage Broker Fee \$3,695 | \$255.00 |


| 00000000013273 | Loan Origination Fee <br> $\$ 6,069.88$ | Loan Origination Fee <br> $\$ 5,500$ | $\$ 569.88$ |
| :---: | :---: | :---: | :---: |
| 303018721 | Processing Fee <br> $\$ 490$ | Processing Fee <br> $\$ 295$ | $\$ 195.00$ |
| 5100014489 | Processing Fee <br> $\$ 550$ | Processing <br> $\$ 500$ | $\$ 50.00$ |
| 30001046058 | Broker Fee <br> $\$ 500.00$ | Broker Fee <br> $\$ 0.00$ | $\$ 500.00$ |
| 3500029714 | Total Fees to NEM after <br> Broker Credit <br> $\$ 5,797.50$ | No disclosures issued <br> prior to settlement | $\$ 5,797.50$ |
| 0044854305 | Mortgage Broker Fee <br> $\$ 415$ | Mortgage Broker Fee <br> $\$ 395$ | $\$ 20.00$ |
| 30000001265758 | Total Fees to NEM <br> $\$ 9,495$ | No disclosures issued <br> prior to settlement | $\$ 9,495.00$ |

