Ex. 10 – Blueacorn Paycheck Protection Program Loan Processing Script Containing Guidelines for Enhanced Due Diligence

Paycheck Protection Program Loan Processing Script

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[TOC \h \u \z \n]

Welcome EVers

Welcome to Blueacorn's Paycheck Protection Program project. This project involves processing loan applications submitted to the SBA for the Paycheck Protection Program (PPP), a program passed by the federal government to ensure that businesses can pay their employees and themselves during the Covid-19 pandemic.

This document will serve as a primary resource for processing loans throughout the project. Please review this document carefully and bookmark it for future reference and do not hesitate to seek assistance from your EV Manager if there are any questions or concerns.

Getting Started

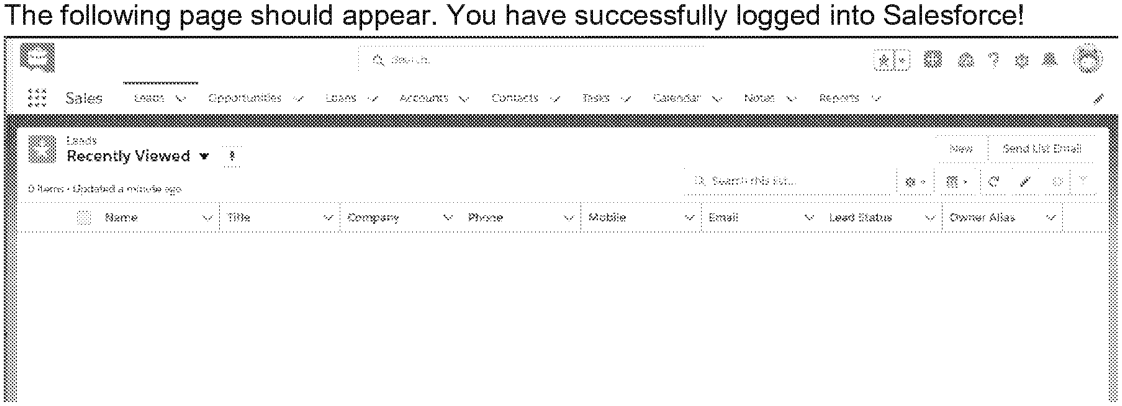
In this section, we will walk through accessing SalesForce, setting up Salesforce in the Sales Console View, creating your personal queue, and getting started on loans.

Accessing Salesforce

1. Navigate to the SalesForce Login page using the following URL: [HYPERLINK "https://login.salesforce.com/" \h] The following page should appear.

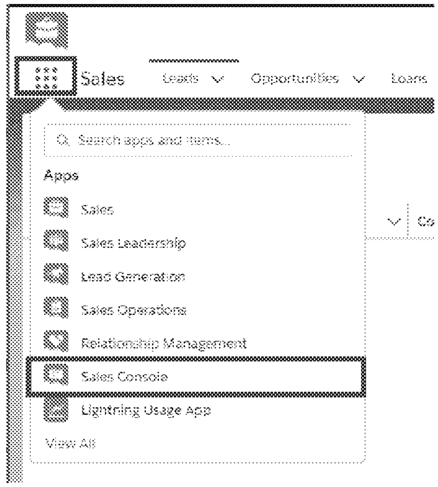
2. Enter your Blue Acorn username and password, and click the **login** button.

3. The following page should appear. You have successfully logged into Salesforce!

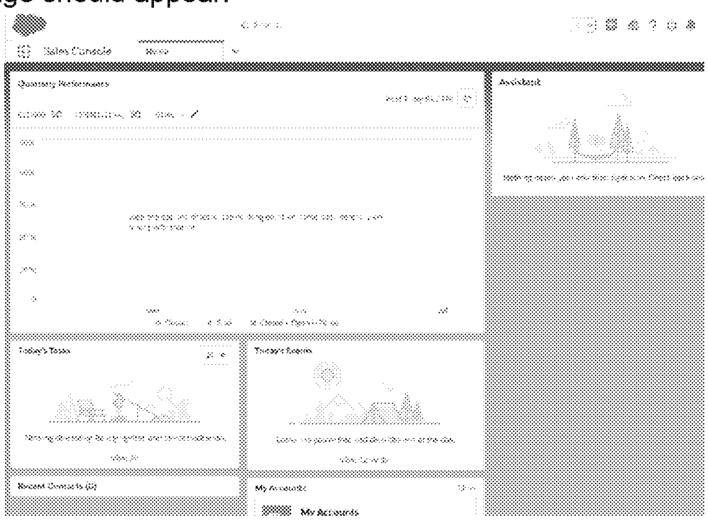


Setting up Salesforce in Sales Console View

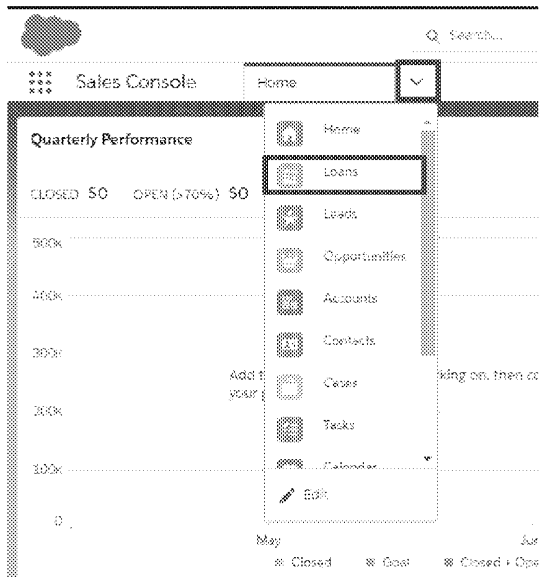
1. Select the **9 Dots** listed in the upper left corner of the window. Select **Sales Console** from the dropdown menu.



2. The following page should appear.



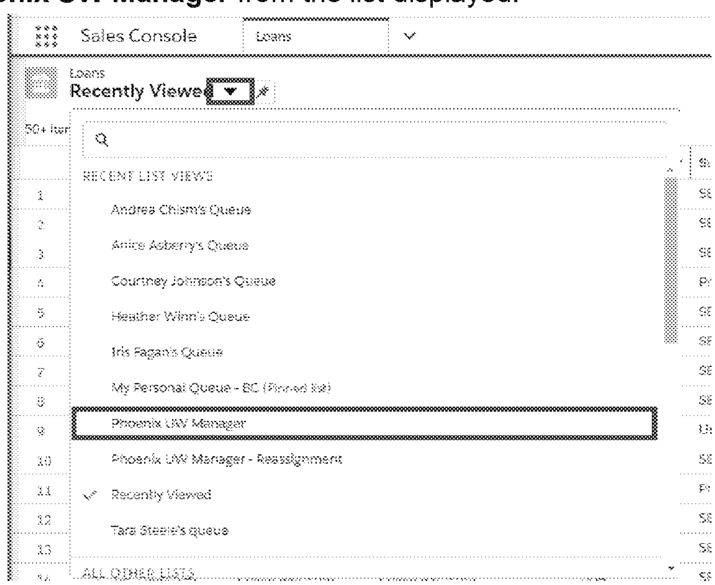
3. Select the **dropdown arrow** next to the Home tab. Select **Loans**.



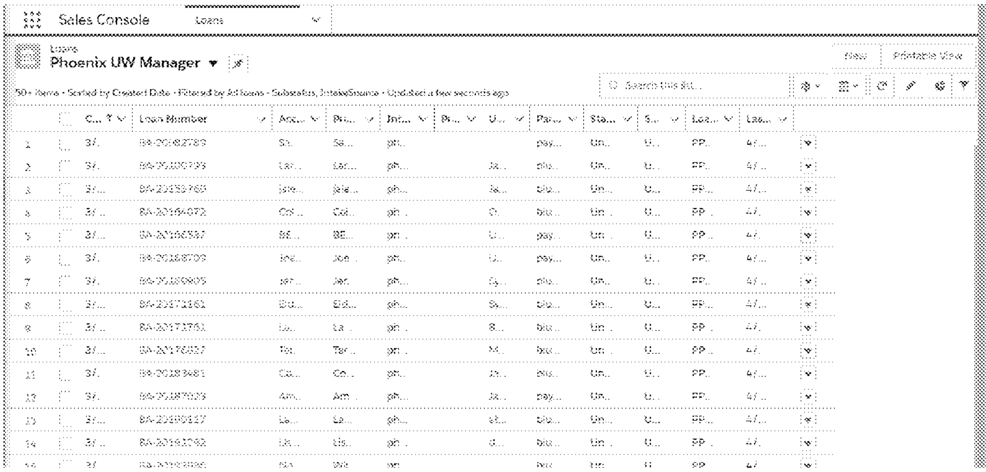
4. The menu bar at the top of the page should match the picture shown below. You have now entered the Sales Console View!

Setting Up Your Personal Loan Queue

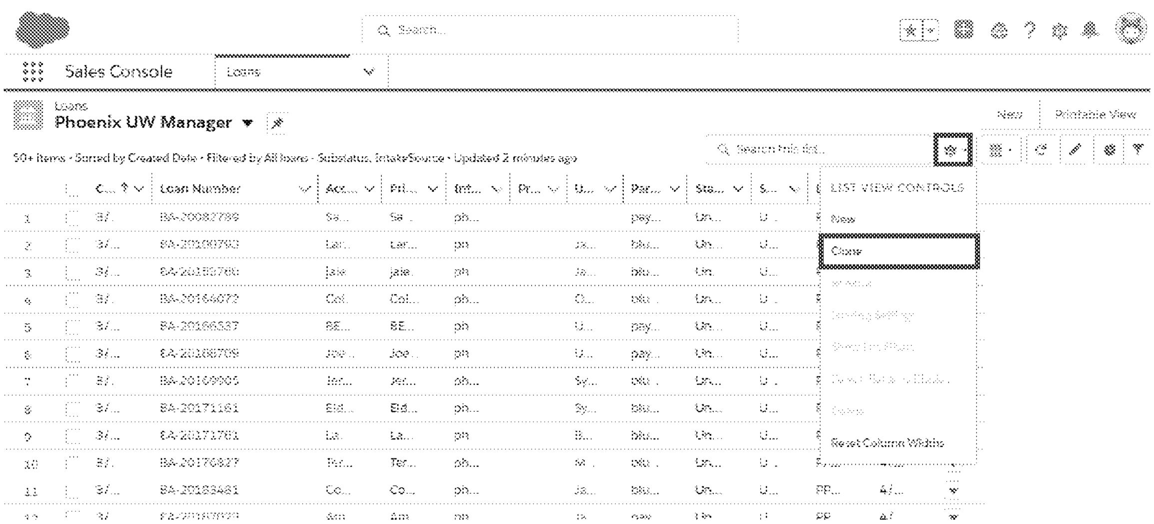
1. Once in the Loans tab in Sales Console View, select the dropdown arrow shown below, and select **Phoenix UW Manager** from the list displayed.



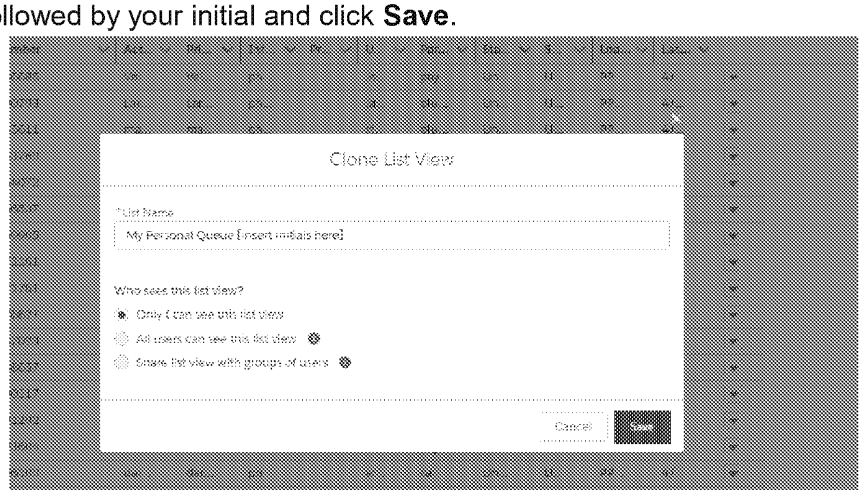
2. The following page should appear.



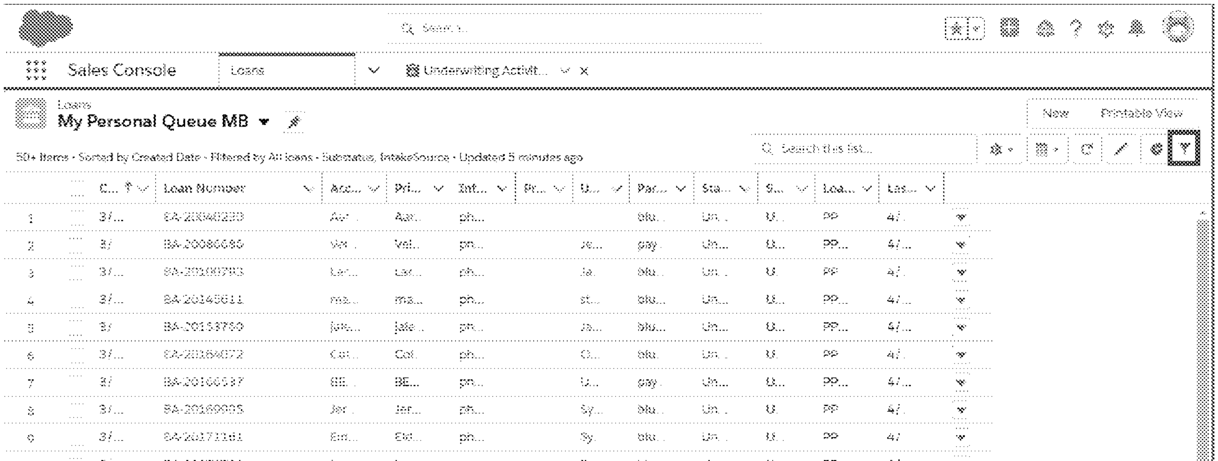
3. Select the dropdown arrow next to **The Gear Icon**, and select **clone** from the dropdown menu.



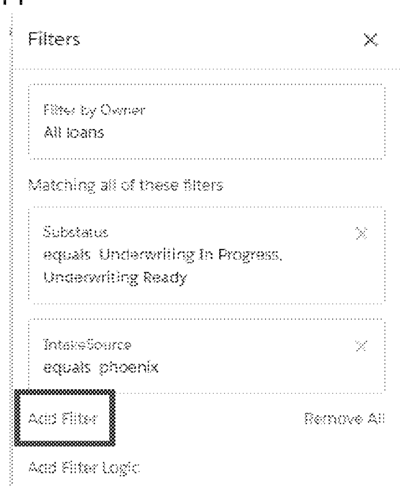
4. The *Clone List View* window should appear. In the *List Name* box, enter “My Personal Queue” followed by your initial and click **Save**.



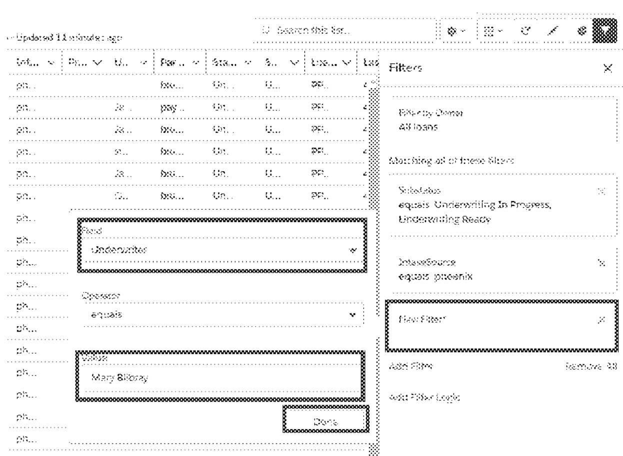
5. The following page should appear. Click on the **Filter** icon on the right side of the page.



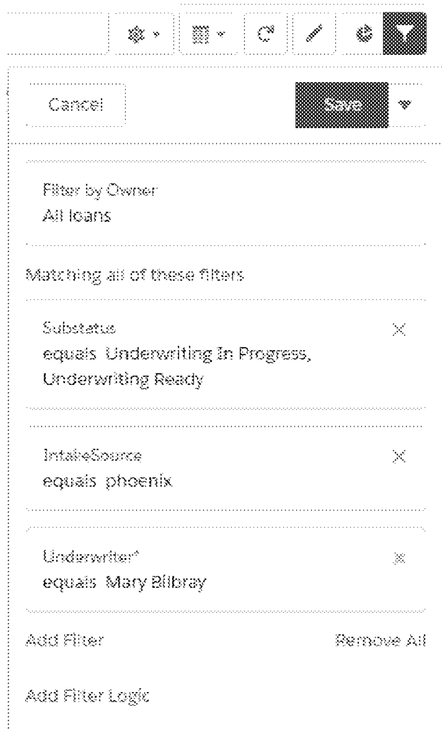
6. The following page should appear. Select **Add Filter.**



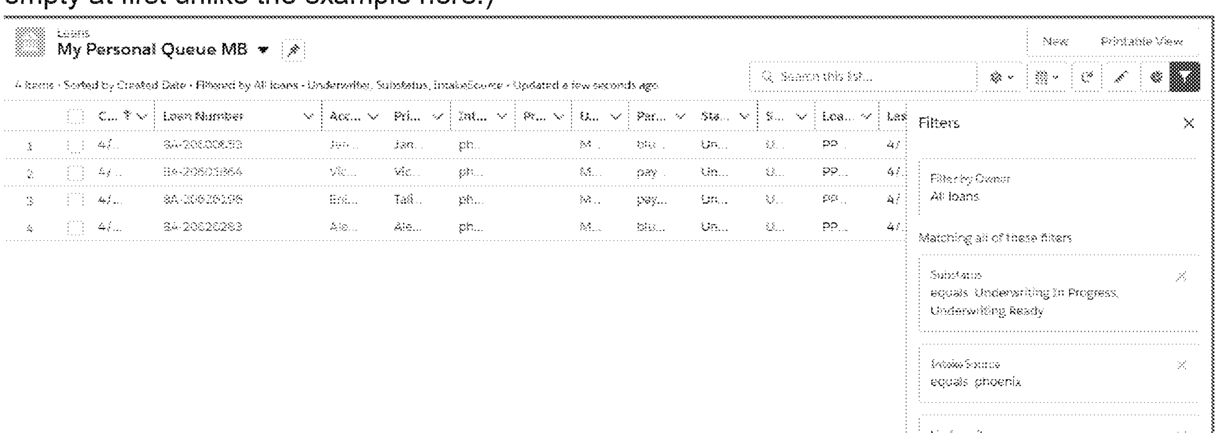
7. The following page should appear. Select the **New Filter** box. For the *Field* box, ensure that **Underwriter** is selected from the dropdown menu. For the *value* box, enter your full first and last name (NOTE: This must be your full name spelled correctly). Select the **Done** button.



8. Select **Save**.

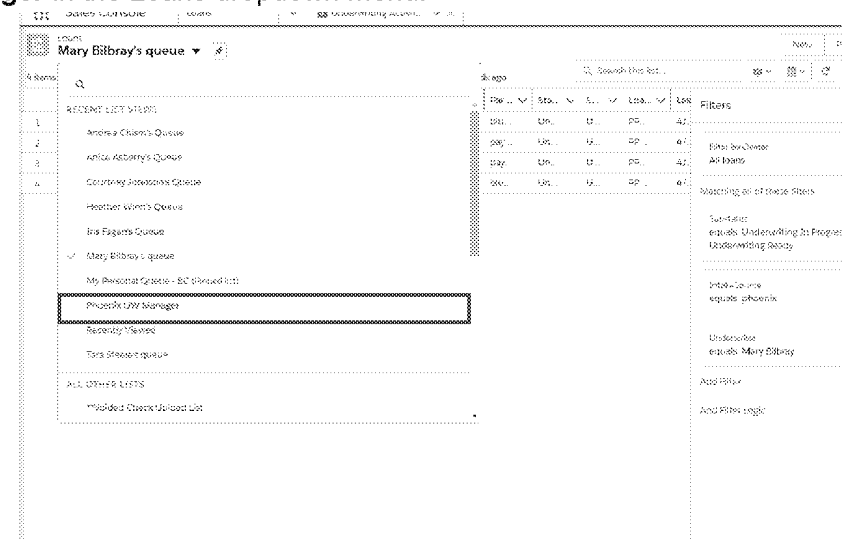


9. Congratulations. You have successfully made your personal queue. (Note: it will likely be empty at first unlike the example here.)

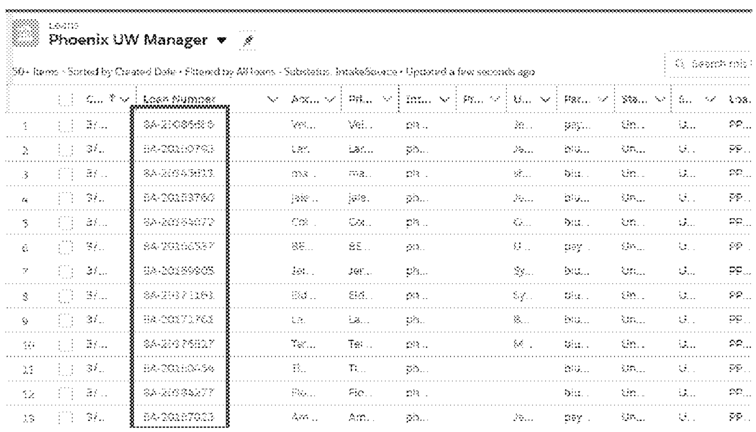


Getting Started on Loans

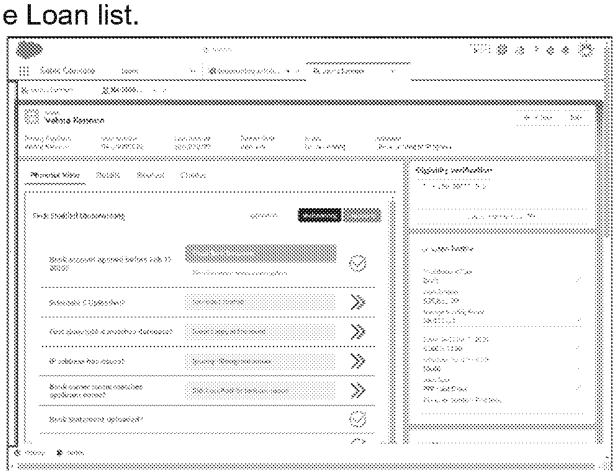
1. Your personal queue should be empty at first. To access loans, first go to the **Phoenix UW Manager** in the Loans dropdown menu.



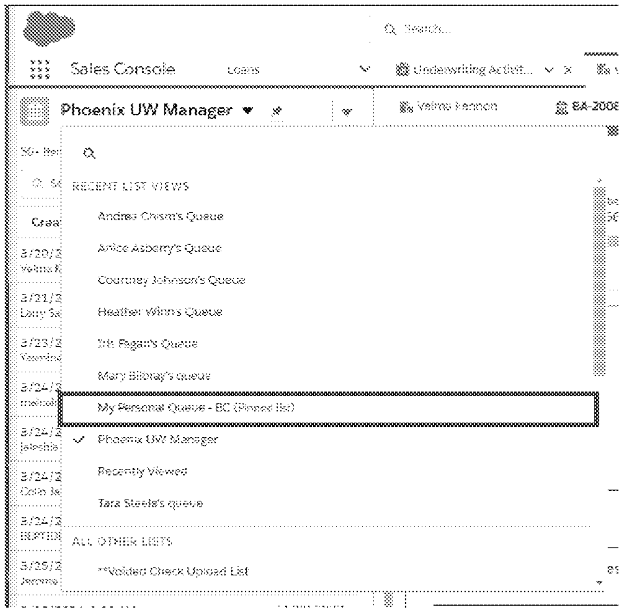
2. Select any **Loan Number** from the Loan Number column.



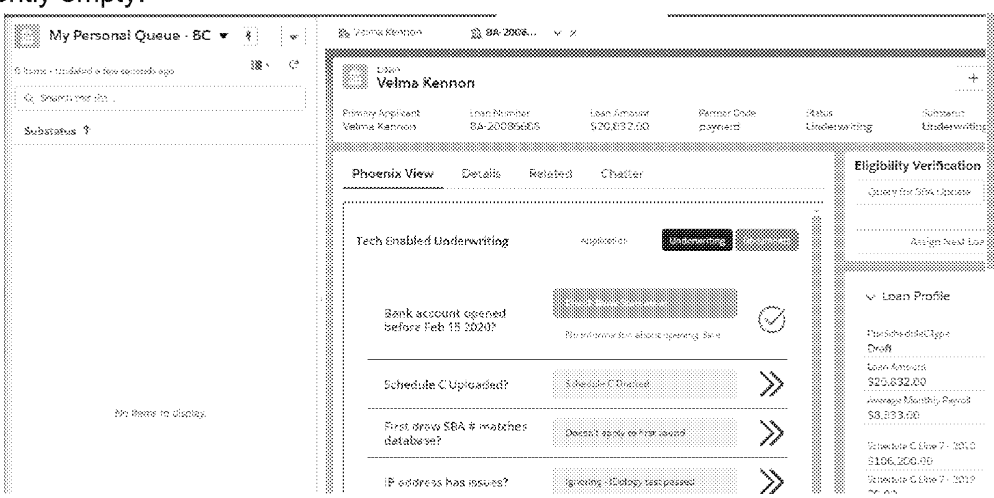
3. A page similar to the following should appear. Select the **arrow** on the left side of the screen to pop out the Loan list.



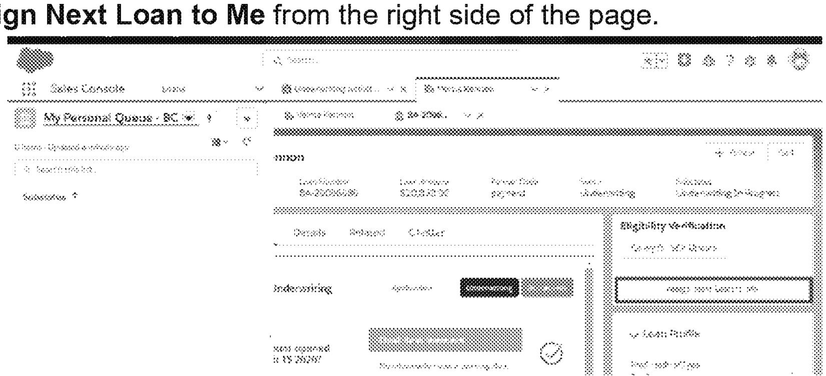
4. A menu similar to the following should appear. Select the personal queue you made earlier from the Loans dropdown menu.



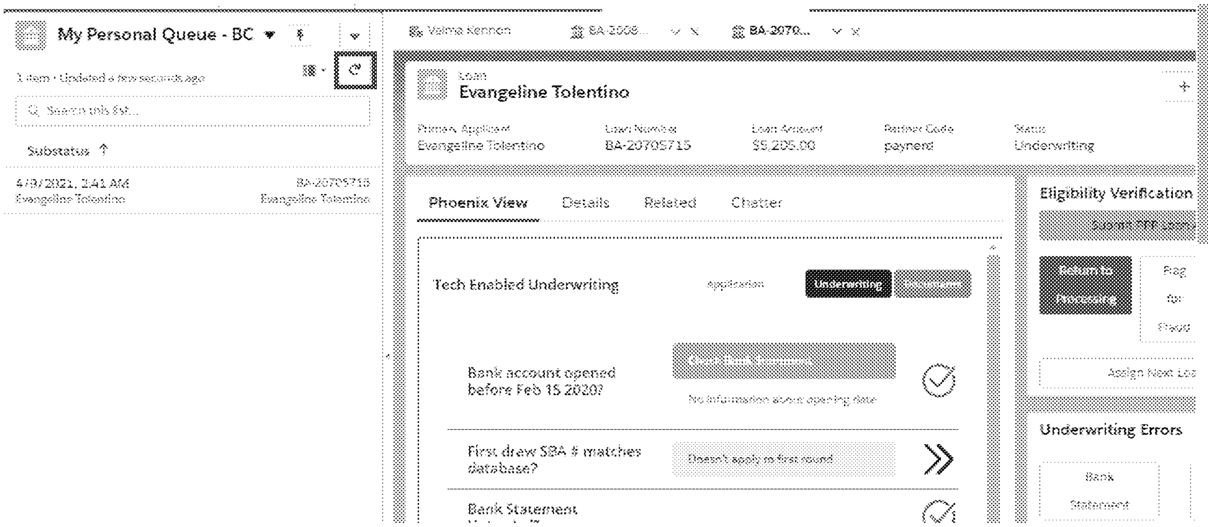
5. The menu on the left side of the page will now show your personal queue. Note how it is currently empty.



6. Select **Assign Next Loan to Me** from the right side of the page.



7. You have now assigned yourself a loan! If you hit the refresh button in the menu displaying your personal queue, you should see the loan populate in your queue. Now you're ready to get to work!

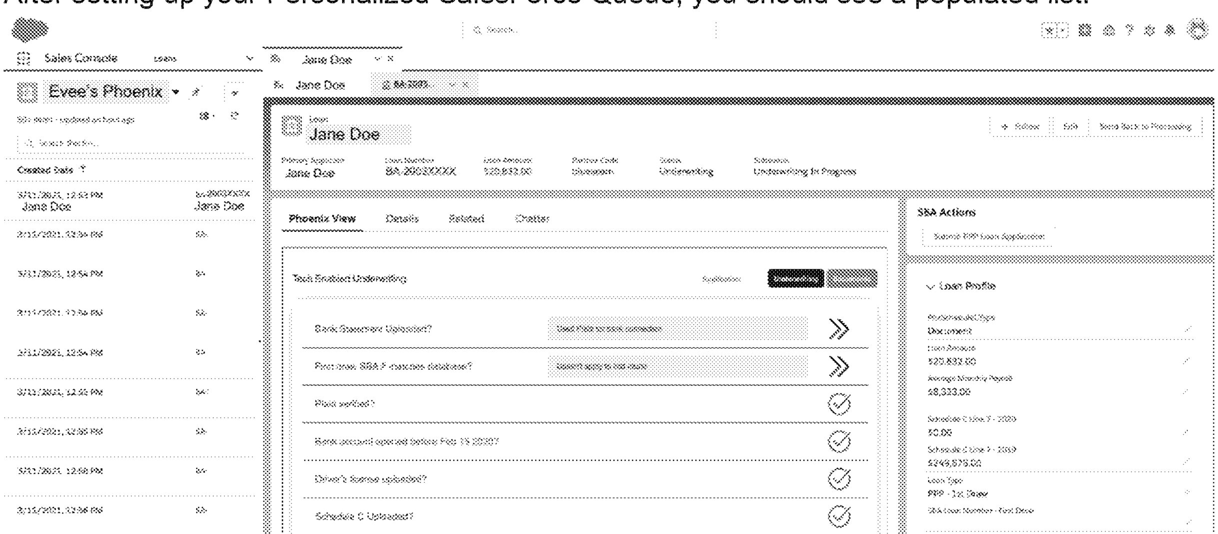


Understanding SalesForce

This section will explain the tools presented in SalesForce.

Sales Console Phoenix View: What you will need while working through loans

After setting up your Personalized SalesForce Queue, you should see a populated list:



- From this list you can see your assigned loans on the left.

- On the right you can see your first PPP loan.

Overview of the Fields in the Phoenix View EV Tab

See **Working Through Loans** for further detail on EV process and loan requirements

For the Eligibility Verification process, we will stay strictly in the **Phoenix View** tab.

1. *Bank Statement Uploaded?*
    a. If applicant's bank account is not Plaid verified, this field will state "Check Bank Statement" and the EVer will perform a thorough review of the bank statement
    b. If cleared by Plaid there will be no flag but EV still checks bank statements for each applicant
2. *Plaid verified?*
    a. When applying through the initial PPP loan application, the applicant is given the opportunity to log into their bank account through Plaid, a bank account verification system. This system verifies ownership of the bank account and if the bank account was created before February 15, 2020.
    b. Some applications will be flagged on the Phoenix view for "Bank Account doesn't show transactions before Feb 15, 2020" meaning that Plaid was unable to verify both Bank Account Ownership AND verify the bank account has had transactions before February 15th, 2020.
3. *Driver's license uploaded?*
    a. Onfido has verified the ID
        i. Onfido is an identity verification system that requires the applicant to take a "selfie" of their face which is then digitally compared to the applicant's Driver's License or government issued ID.
    b. EVer reviews the ID and application name to ensure Onfido functioned correctly
4. *Schedule C Uploaded?*
    a. Clear picture or Uploaded Schedule C Document
    b. A Draft schedule C was used - no physical file will be required
    c. The applicant is missing a file and no draft created so application will need to be returned

5. *Loan amount calculation correct?*

   a. An error here could indicate a $0 line 7 or a miscalculated loan amount. Consult the training guide for calculations and verify line 7 amount from schedule c.

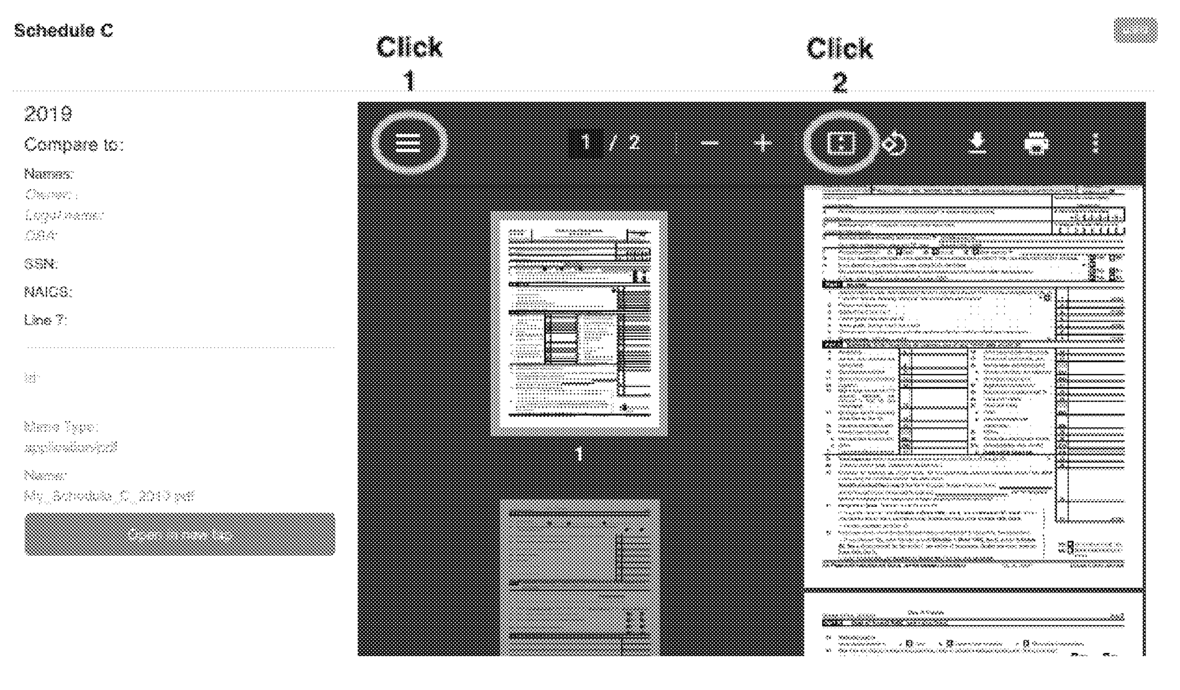
Optimizing SalesForce: Tools to help you use SalesForce more efficiently

When viewing the documents under the **Documents** tab, we see a small version of the document.

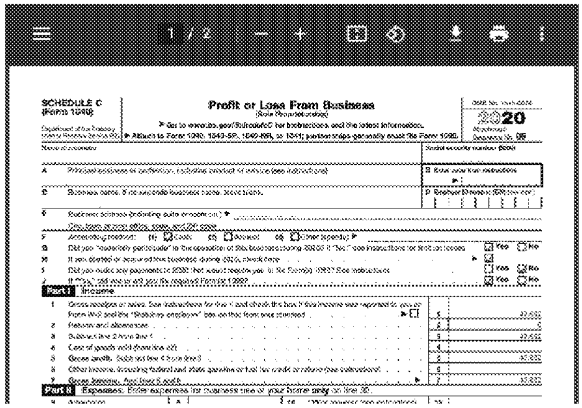
To view within the window:

Click 1 (The menu button) Once.

Click 2 (The view size button) Two times.



This will maximize the view of the document within the window of the **Documents** tab.

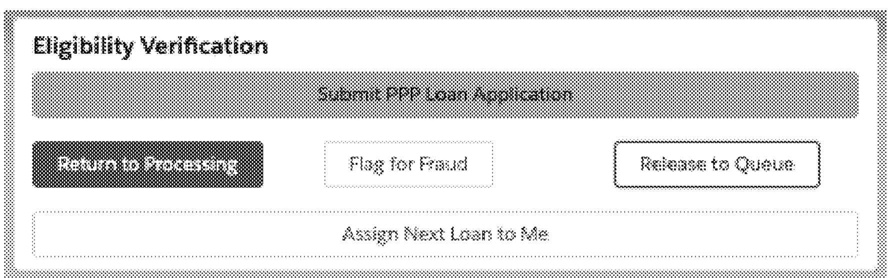


Sending a Loan Back to Processing

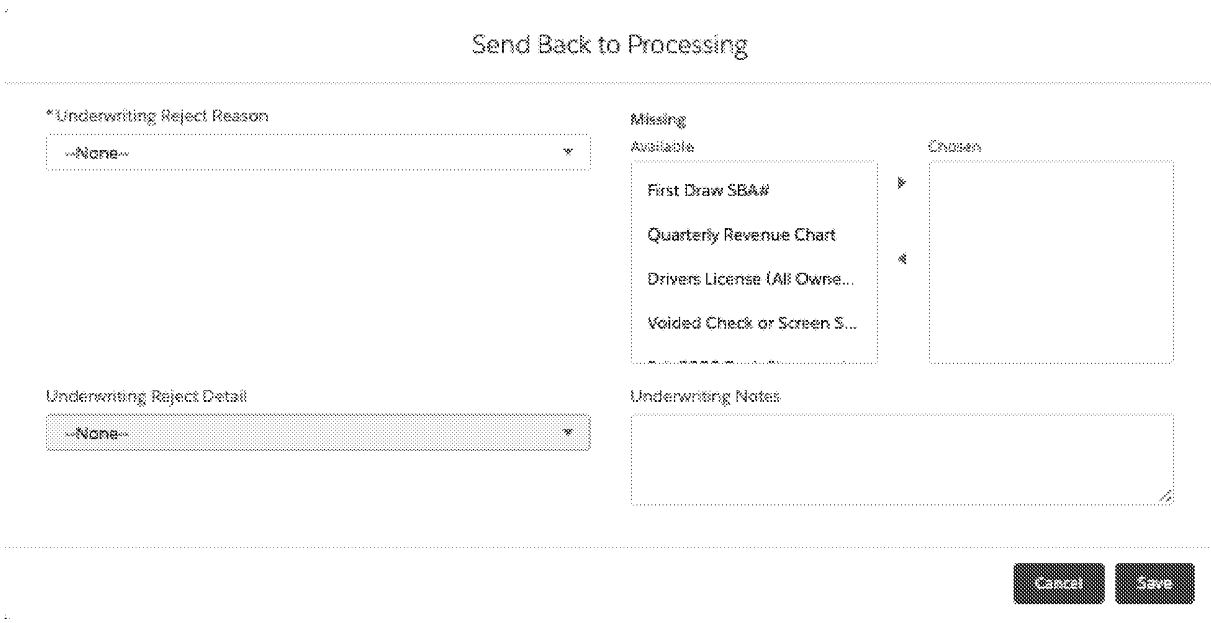
There are a multitude of reasons why a loan does not pass Eligibility Verification (Bank Statement date ranges are not acceptable, the Schedule C is not legible, a document other than a Schedule C is uploaded, etc.). When returning a loan to processing, we need to provide the reason(s) the loan did not successfully pass Eligibility Verification.

To send an application back to Processing due to Errors:

1. Click the **Sent Back to Processing** button, in the **Eligibility Verification** information section.



2. This window will appear.

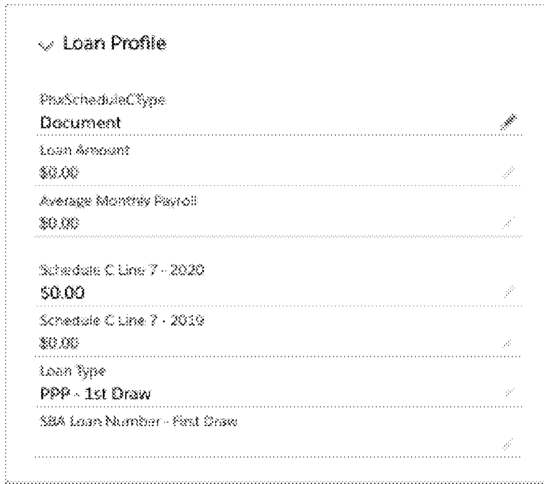


3. Select the reason(s) for returning a loan to Processing, and then click “Save”. Once this action is completed, the loan is moved out of your queue and no further action is needed. Proceed to “**Assign Next Loan to Me**”

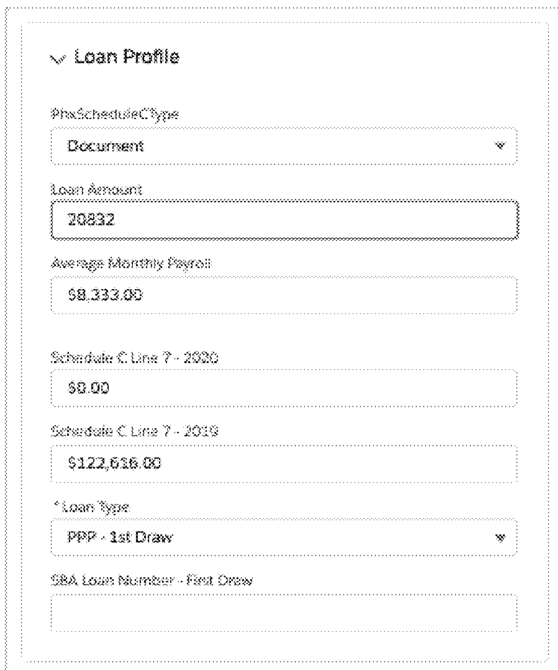
Walk Through of Correcting Information in the Loan Application and Loan Calculations

When going in to check the documents, there may be errors or missing information in the SalesForce file.

The first example, 0’s in the **Loan Profile** Section but we have an uploaded Schedule C document.



To edit this area, click on the pencil icon to the right of *PhxScheduleCType*. That will bring up the Editing Window.

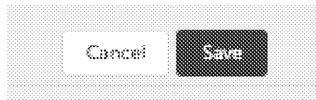


Cross-check this information with the information in the uploaded Schedule C document. You can add the income from multiple Schedule Cs in the same year if the applicant had different sources of income and filed multiple Schedule Cs.

1. Starting with Schedule C Line 7 - 2019
   - This example document has Line 7 listed as *$122,616.00*.
   - **Every applicant has an annual gross income cap of $100,000 that is eligible for forgiveness in the PPP program. This is the figure listed on Line 7 of the Schedule C**

2. Take $100,000 and divide it by 12 (the number of months in a year).
    - This **A**verage **M**onthly **P**ayroll is *$8,333.00* (do not include decimals).
3. Then multiply the **AMP** by 2.5 (2 ½ months of payroll).
    - This equals *$20,832.00* (do not include decimals and always round down).

Once you have all the correct information filled out, at the bottom of the screen you will see the **SAVE** button.



Working Through Loans

This section will provide more in-depth detail on what you need to be looking for when working on loans:

Identification: Does the name match the Phoenix Data

We can accept any US Government issued ID whether it be temporary or permanent. Expired or not.
All IDs must have:
1) Legible name
2) Picture

We can accept:
-City Identification cards
-Correction identification cards
-Cards that say “Not for federal identification purposes”
-Driver’s Licenses that are expired
-Green cards

Check out [HYPERLINK \l "_8hz8hsllh6ow" \h] for questions about fraudulent IDs

Schedule C: Does the Schedule C data match the Phoenix Data?

We are confirming that the name on the Schedule C provided matches the name or DBA name matches the Phoenix data and identification. Nicknames permitted. (Robert/Rob).

Verify the line 7 amount on the document in Phoenix data. As of May 10th 2021, we are no longer doing any calculations when manually correcting the Schedule C Line 7 amount. We only have to correct the Line 7 amount to match the applicant's Schedule C and the system will now automatically calculate Average Monthly Payroll and Loan Amount.

If you come across two schedule C's from **two different** businesses, **add the Line 7's together**, process as normal.

- **Every applicant has an annual gross income cap of $100,000 that is eligible for forgiveness in the PPP program. This is the figure listed on Line 7 of the Schedule C**

Bank Statement:
Is there a date within the range of December 1st 2019 to March 31st 2020 on the bank statement? Is the applicant's name or DBA name on the statement? Is the bank name (and Logo for larger banks) on the statement?

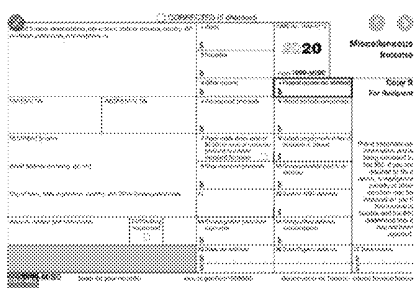
Bank Statements must have:

1) Matching name or DBA name
2) **A date within the range December 1st 2019 - March 31st 2020**
3) Bank name/logo

Statements with any November dates cannot be accepted, even if the statement goes into December.
Statements can go into March, but they must have a February date and cannot have an April date.

In place of Bank Statement, we can accept:

- 1099-MISC or 1099-G - Feb 2020. Example:



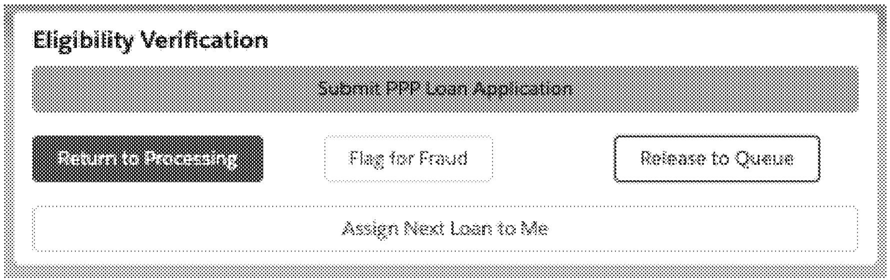
- Self Employed Book of Record (CPA Certified) - **December 1st 2019 - March 31st 2020**
- State Unemployment Insurance Tax Records - **December 1st 2019 - March 31st 2020**

What kind of statements do we not accept?

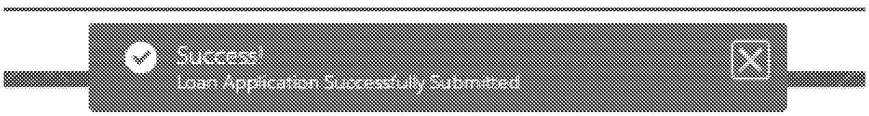
- Prepaid cards statements, balances screenshots, or transaction statements.
- Cash App, Venmo, or Paypal Statements.
- Transaction statements, invoices, or screenshots of bank transactions.

See [HYPERLINK \l "_4cwok2c9fyhc" \h] for more information regarding identifying Fraudulent Bank Statement

If all of the above checks have been completed in alignment with all automated fraud checks and all information/documents have been reviewed and verified, it is time to click the **Submit PPP Loan Application** button.



If there are no SalesForce systematic issues we will see **Success!**



No Further action is required at this time, and another loan can be pulled from the queue using the **"Assign Next Loan to Me"** button to continue.

Wrapping up for the day

When you leave for the day, send your loan back to the general queue by clicking "Release to Queue" or finish the loans in your personal queue. Do NOT leave loans in your queue. Log out of SalesForce once these steps are completed.

Appendices

Appendix A: ID Check

This is a link to the website that displays each state's Identification/Drivers Licenses.

1. [HYPERLINK "https://www.insider.com/what-drivers-license-looks-like-in-every-state" \l "arizonas-drivers-license-shows-a-desert-landscape-in-the-background-the-state-has-four-different-deserts-3" \h]

2. [HYPERLINK "https://dmvnv.com/50_state_dmv_list.html" \h]

Look for computer generated images, white-out names, and other obvious fraud.

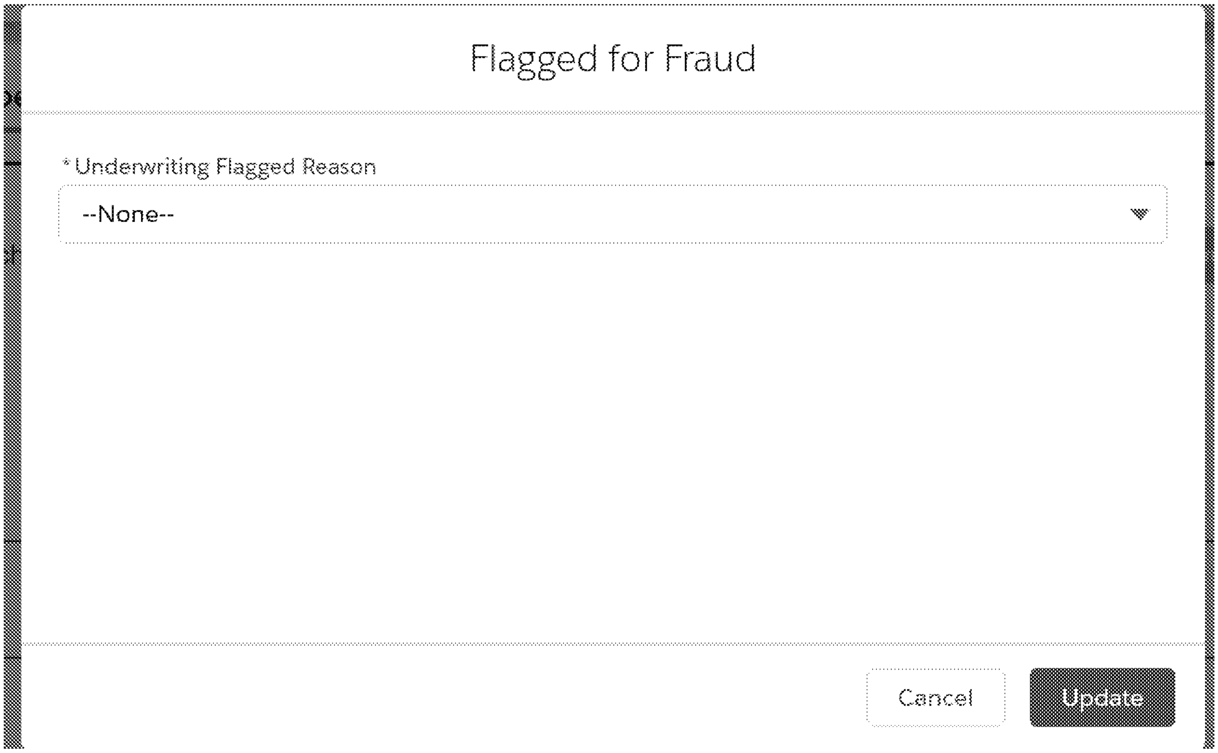
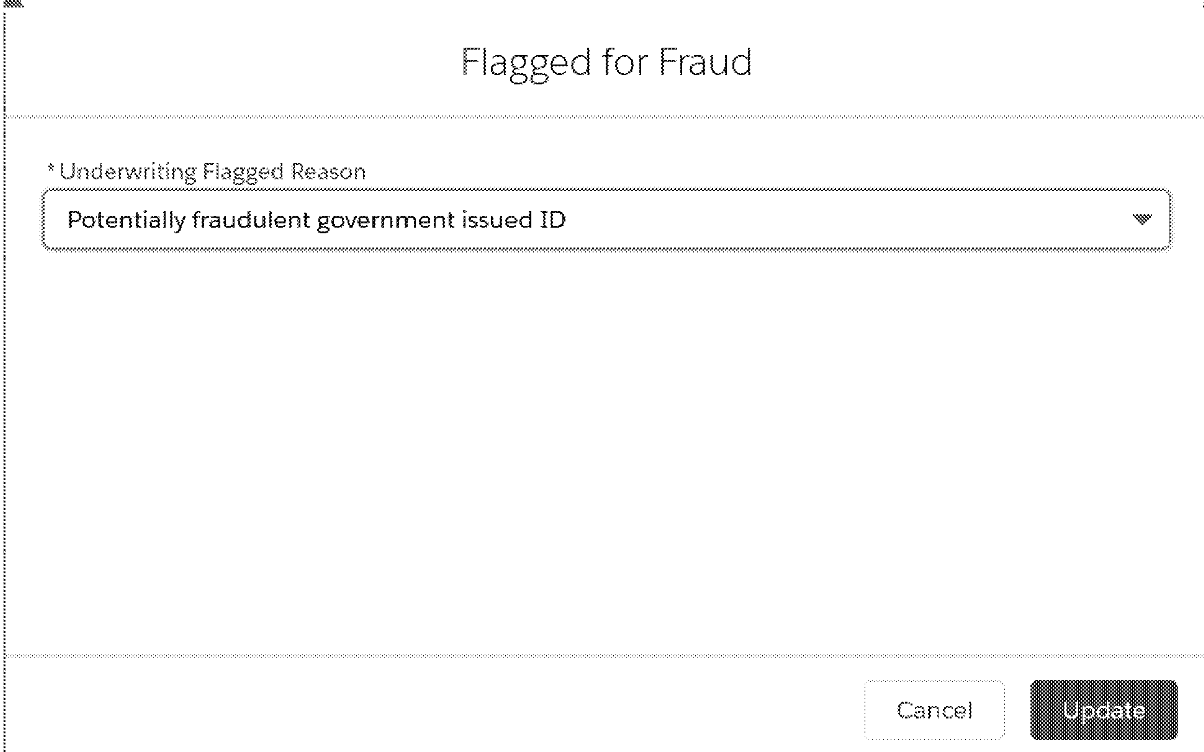
When checking ID look for obvious clues:

- Type and size of font
- Lining of Text
- Size and Quality of Picture
    - B&W portrait is a byproduct of our cards being printed on polycarbonate (PC)
- Signature on the ID

If the Government issued ID looks like Fraud please “Flag for Fraud”. We do not click the return to processing tab when flagging for fraud. It is an action on its own to flag for fraud.

Flag for

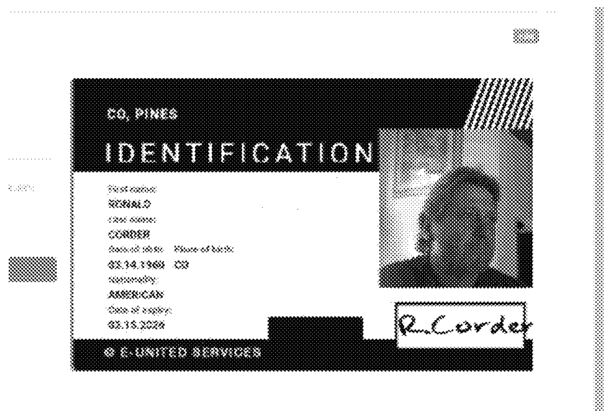
Fraud

- 
Flagged for Fraud
* Underwriting Flagged Reason
--None--
Cancel
Update
- 
Flagged for Fraud
* Underwriting Flagged Reason
Potentially fraudulent government issued ID
Cancel
Update

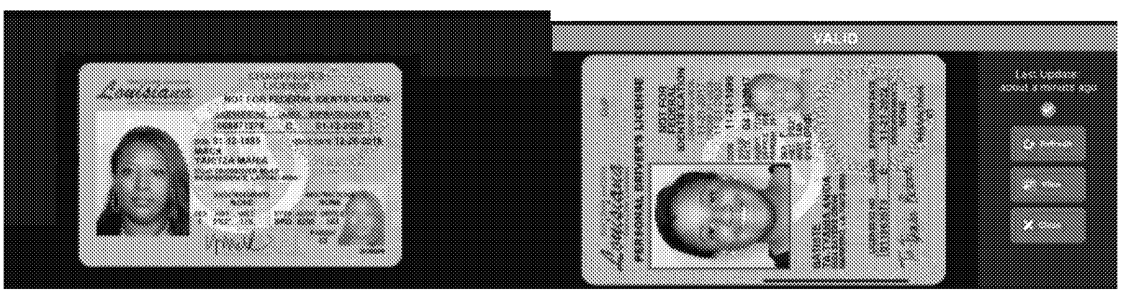
Appendix B: Fraudulent Identification

Our primary goal as EVers is to be accurate and produce a quality product. We should keep an eye out for obvious signs of fraud, and mark them as fraudulent where appropriate.

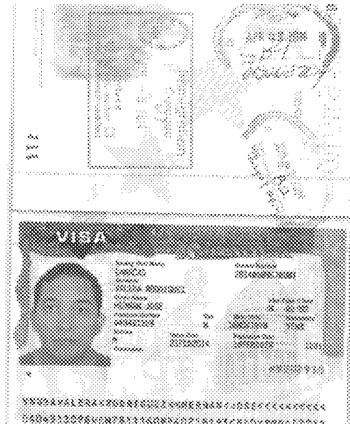
The following shows examples of Fraudulent Identification. These examples should help highlight what should be considered fraudulent.



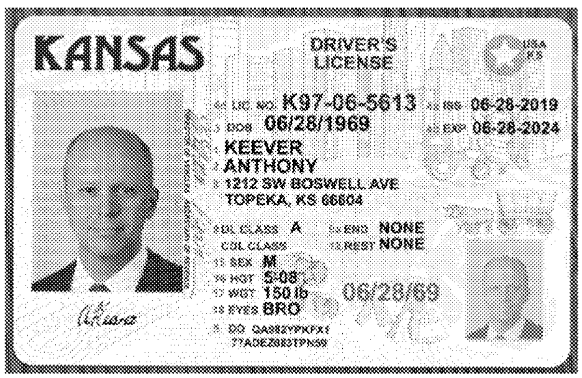
This is a fake ID



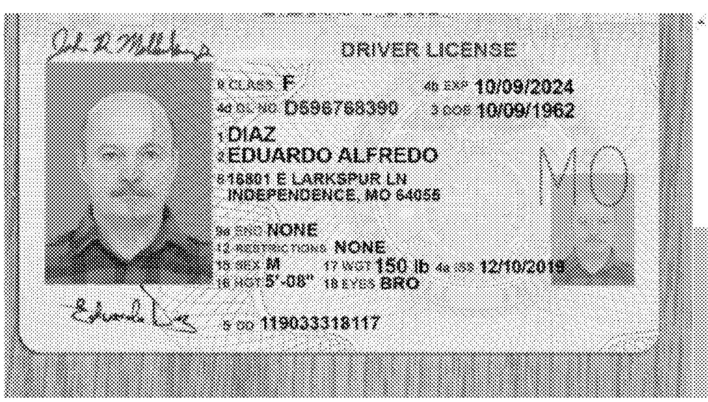
While these may look fraudulent, these are actually real. They are digital IDs that are accepted in Louisiana. But in general computer ID's like this are fraudulent, **except for Lousianna**.



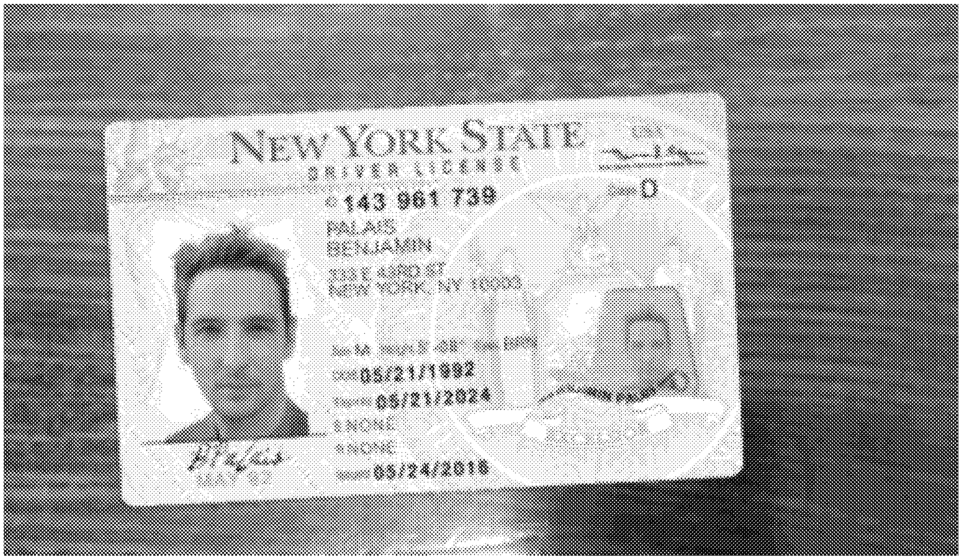
WORK VISAS: This is an example of what work visas look like. As this case is a government-issued ID with a picture AND is Plaid Verified, we would accept that work Visa.



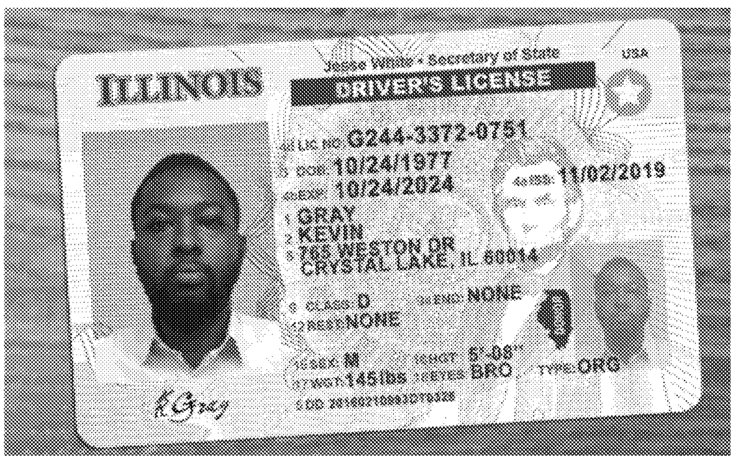
This is an example of a digitally altered license. Note how it pops off the page unlike what may be seen in a real ID. It almost looks too perfect



A digitally altered license



A digitally altered license



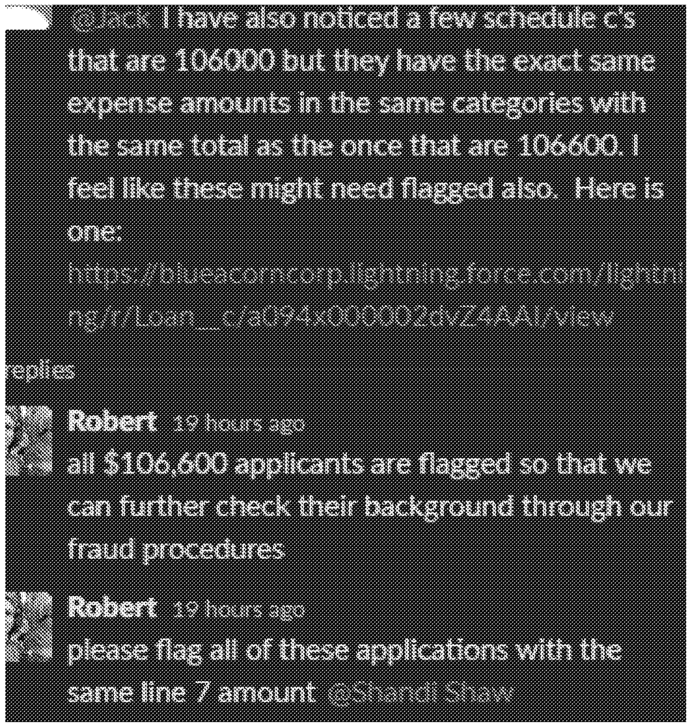
A digitally altered license

Keep an eye out for fraudulent passports like this.

Appendix C: Fraudulent Schedule Cs

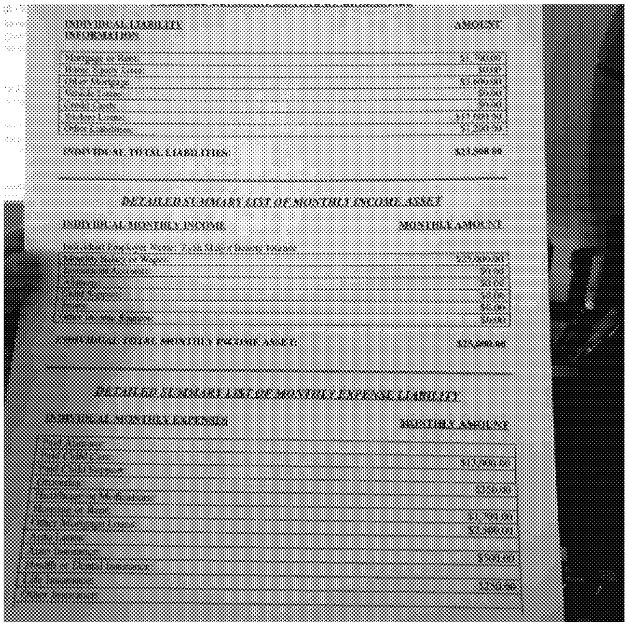
Things to look out for with Schedule Cs:

1. Is the font consistent throughout the document?
    a. Discuss with your EV Manager if you are not sure or have doubts
2. Is the Line 7 amount $106,600? **Flag for fraud**

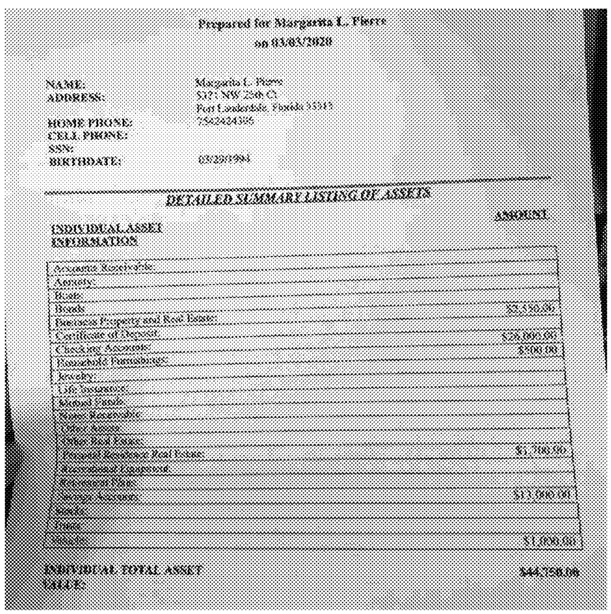


Appendix D: Fraudulent Bank Statements or not a bank statement

Many different types of bank statements exist. Below are some examples of ones we do not accept as bank statements.



Not a bank statement

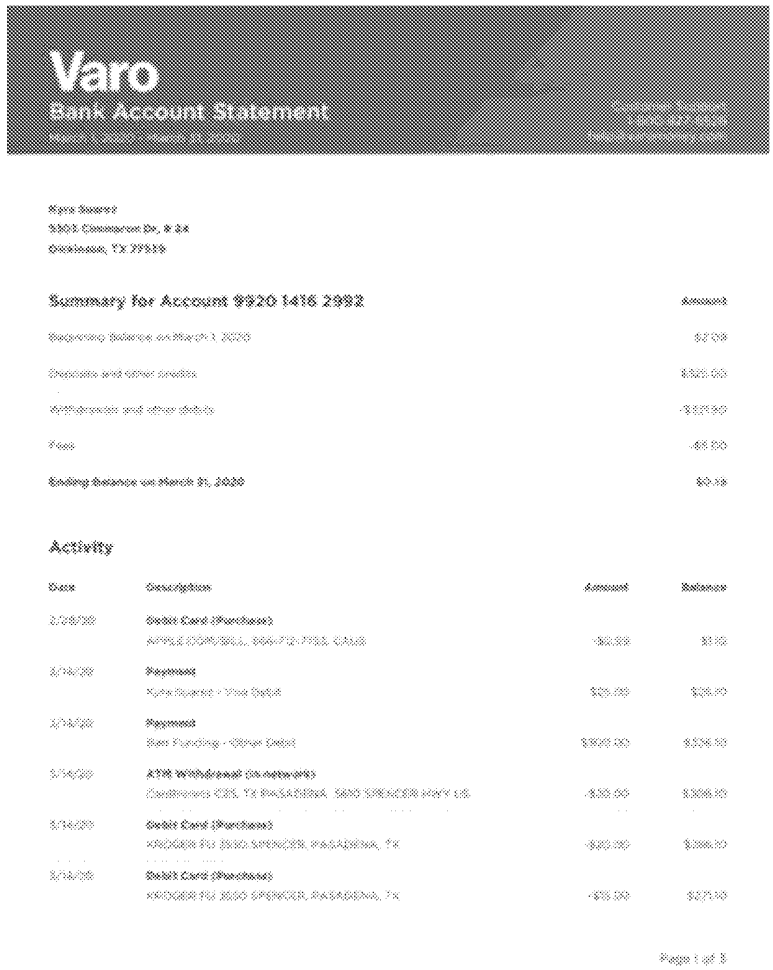


Not a bank statement

Both of these Varo bank statements below are acceptable and **NOT** fraudulent. The one on the left is a screenshot from the app, while the one on the right is the PDF download.

This is a great example of two **authentic** documents having a reason for being different. Do not expect all licenses or statements to look exactly the same just because you are familiar with one format!


Metro by T-Mob... LTE 10:45 AM 68%
February
Varo


Varo
Bank Account Statement
Summary for Account 9920 1416 2992
Activity

Below are some **NON-fraudulent bank statements.** Make sure you are looking at the logos, fonts, and date layouts. If you are ever stuck on one, just glance back here and double check.

REGIONS

ACCOUNT #

LIFEGREEN CHECKING

SUMMARY

DEPOSITS & CREDITS

WITHDRAWALS

CHASE

CUSTOMER SERVICE INFORMATION

We updated the way we post certain transactions to your account

What's staying the same:

What's changing:

Our courtesy practice related to refunds

CHECKING SUMMARY

Rafael Lopes Fraga

N26

Bank Statement Nr. 04/2018

Balance

Thursday, 5 April 2018

BANCO DO BRASIL

N26 Bank

Thursday, 12 April 2018

ORDEM ENGENHEIROS

PNC Smart Checking Statement

PNC BANK

IMPORTANT INFORMATION ABOUT LINKED ACCOUNTS

Be Alert for Fraudulent Communications

PNC Smart Checking Account Summary

N26 is a legitimate bank and can be accepted

Appendix E: IP Address Fraud

The only IP address we need to flag for fraud is "Non-US" IP

[HYPERLINK "https://blueacorngroup.slack.com/archives/C01QVBY6SKZ/p1617155002248400" \h]

Phoenix View IP and Fraud Errors	
IP Address used for 5 or more applications	Ignore
IP Detected as proxy. Proceed with caution	Ignore
No IP Addresses Stored	Ignore
Abused IP	Ignore
Fraud Score Suspicious (>= 75)	Ignore
IP Blacklisted (100 score)	Ignore
Fraud score high (>=85)	Ignore
Non-US IP	Flag for fraud -> IP Address Issue

If the deal says "Proceed with caution" then conduct a thorough review and submit the deal if it is successfully verified

Appendix F: Enhanced Due Diligence (Beginning June 11th, 2021)

Enhanced Due Diligence is a process that will be mandated for a portion of our applicants in various “Backoffice” funding stages. They all have been approved initially by the SBA but are being requested to submit additional documentation.

We have their original documentation on file (ID, Schedule C, Bank Statements) but will be asking them to submit a fourth document. The EV’s trained to do Enhanced Due Diligence (EDD) will follow all the normal EV policy for the original documentation. Think of it like double checking our work. Our goal in EDD is to be as thorough and accurate as possible when assessing these applications.

The fourth document we are requesting is a full 1040 tax return from either 2019 or 2020.

Similar to the other document requirements, the 1040 must be in the Applicant’s or DBA name.

The 1040 will have to include a Schedule C as well. This will be reconciled against the initial schedule c data the applicant provided, whether drafted or filed documents were submitted.

If the 1040 does not include a Schedule C then the applicant is not approved. If the Schedule C on their full tax return shows a significant discrepancy between the initial application (over $10,000 less income on their filed taxes when compared to the reported income for the loan amount calculations), the application does not pass Enhanced Due Diligence and will not be approved. We do not edit the income at this stage because the applicant has already been approved by the SBA with the previous data. If they make over $100k, the $10,000 rule does not apply as the applicant already qualifies for the full loan amount.