

Compliance and Resources¹

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I. Electronic Loan Transactions: Sweet Dream or Pipe Dream?

- A. On March 30, 2001, the Federal Reserve Board (FRB) published interim rules to implement the federal E-sign law and to permit electronic loan and deposit disclosures. See 66 FR 17779 (Regulation B, Equal Credit Opportunity); 66 FR 17786 (Regulation E, Electronic Fund Transfers); 66 FR 17322 (Regulation M, Consumer Leasing); 66 FR 17329 (Regulation Z, Truth in Lending); 66 FR 17795 (Regulation DD, Truth in Savings). The brave new world is here - the rules are effective immediately, and compliance was to be mandatory on October 1, 2001; however, the FRB lifted mandatory compliance on August 3, 2001 citing “operational issues.” Included in the rules for electronic lending disclosures (Regulations B and Z) are the following requirements:
1. Regulation B (12 CFR Part 202)—Equal Credit Opportunity Act
 - a. Disclosures must be “clear and conspicuous.” The disclosures must also describe (by account number and/or name of loan product) the credit that the applicant is requesting. The disclosures must be accompanied by instructions on how to access and retain the disclosures. Disclosures and instructions may be delivered by email to an address selected by the consumer (disclosures cannot be delivered through a proprietary home banking system), or they may be provided on the web page with instructions for downloading and/or printing. Disclosures must remain available on the web site or by email for 90 days.

- b. Electronic disclosures are deemed given when sent. If an email containing disclosures is returned to the creditor, the creditor must attempt to resend the disclosures.
 - c. The consumer must consent to receive the disclosures electronically, and must demonstrate the ability to save and/or print the disclosures.
 - d. The three day rule for telephone applications does not apply to electronic disclosures. The consumer must view the disclosures before submitting an electronic application. Links that will allow the consumer to view disclosures at his or her option are not sufficient. The consumer does not need to confirm that he or she read the disclosures.
 - e. The Government Monitoring Questionnaire must be provided prior to the time the consumer submits an application. Hence, this will need to be built into the application to collect the required information.
 - f. Electronic signatures may be used.
2. Regulation Z
- a. Disclosures must be “clear and conspicuous.” The disclosures must also describe (by account number and/or name of loan product) the credit to which the disclosure applies. The disclosures must be accompanied by instructions on how to access and retain the disclosures. Disclosures and instructions may be delivered by email to an address selected by the consumer (disclosures cannot be delivered through a proprietary home banking system), or they may be provided on the web page with instructions for downloading and/or printing. Disclosures must remain available on the web site or by email for 90 days.
 - b. Electronic disclosures are deemed given when sent. If an email containing disclosures is returned to the creditor, the creditor must attempt to resend the disclosures.
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- e. ARM loan disclosures (the program disclosure and the CHARM booklet) must be provided at the time an application is given to the consumer or when a fee is first collected (whichever occurs first). Hence, both of these items must be included in the web site, and must be accessed by the consumer before an application for an ARM loan is submitted.
 - f. The APR must be provided on the same page that an interest rate is advertised, and the APR must be at least as prominent as the interest rate. If a web page or email advertisement contains trigger terms, the required disclosures or examples must be provided on the same page or on a page linked to the advertisement. The link must clearly indicate that additional TILA disclosures are provided through the link.
 - g. The Notice of Right to Cancel may be provided by email, with the consumer's consent and acknowledgment of the ability to save and/or print the disclosure. Only one electronic copy of the disclosure must be provided to each borrower.
 - h. The commentary to regulation Z was amended recently to clarify that the monthly statements (which include required disclosures) for credit cards and lines of credit may be provided electronically, for example, via the Internet. The regulations state that financial institutions may permit customers to call for their periodic statements, but may not require them to do so. If the customer wishes to pick up the statement and the credit agreement has a grace period for payment without accruing finance charges, the statement, including a statement provided by electronic means, must be made available in accordance with the "14-day rule," requiring mailing or delivery of the statement not later than 14 days before the end of the grace period.
3. The FRB published an amendment to the Official Staff Commentary to Regulation E, 12 CFR Part 205, on March 16, 2001. Tucked into the comments was a provision permitting a lender to obtain online consent to draft payments from the borrower's bank account. Under Section 10 of Regulation E, recurring electronic debits from a consumer's account "may be authorized only by a writing signed or similarly authenticated by the consumer." The "similarly authenticated" standard permits signed, written authorizations to be provided electronically. Any authentication mechanism that provides assurance similar to a paper-based signature (such as a mechanism that verified the consumer's identity and evidenced the consumer's assent to the authorization) would satisfy the "similarly authenticated" standard. Examples of electronic signatures include, but are not limited to, digital signatures and security codes. A

security code need not originate with the account-holding institution. The authorization process should evidence the consumer's identity and assent to the authorization. The lender or loan servicer that obtains the authorization must provide a copy of the terms of the authorization to the consumer either electronically or in paper form. Only the consumer may authorize an electronic transfer (e.g. an attorney cannot provide a consent for the consumer).

4. Conspicuously missing from this lineup is any change in HUD's Regulation X, 24 CFR Part 3500. Aside from a brief reference to "we are working on this" in a statement justifying HUD's General Counsel budget, there has been nothing but "vapor-regs" (aka rumors of regulatory reform) from HUD since 1996. The rule remains that consumers must receive paper copies of all HUD disclosures, including the HUD-1 Settlement Statement (with a mandated OMB number in the proper corner of the page). Until HUD is serious about reforming its loan disclosure regulations, consumer electronic loan transactions will remain a pipe dream.
5. Federal Reserve Board Regulations are found at <http://www.federalreserve.gov/regulations/default.htm>. Interim electronic disclosure rules are found at <http://www.federalreserve.gov/boarddocs/press/boardacts/2001/20010329/default.htm>.

II. Gramm-Leach-Bliley: Article V (Financial Privacy)

A. Background

1. The Gramm-Leach-Bliley Act was signed by President Clinton on November 13, 1999.
2. Subpart A of Article V of the G-L-B Act allows consumers to limit dissemination of non-public personal financial information by financial institutions. Subpart B of Article V makes it a felony to obtain or to assist another to obtain customer information from a financial institution through fraud or other pretext.
3. The G-L-B Act expanded the scope of powers granted to banks, thereby increasing the scope of covered institutions.
4. The FTC promulgated regulations for non-depository institutions.
 - a. Certain businesses are, by definition, "financial institutions" covered by the FTC regulations. Examples include lenders, mortgage brokers, loan servicers, and appraisers.
 - b. Other businesses are "financial institutions" covered by the regulations only if they are "significantly engaged" in providing services that a bank or bank holding company may

provide. For example, a law firm is covered by the FTC rules if it significantly provides tax preparation, loan closing, and estate planning and estate administration services.

- B. Only natural persons are protected. Legal entities are not afforded protection by the law. Remember that just because you are involved in a consumer transaction, you may not be providing a service to or for a consumer and, therefore, the rules may not apply to you.
 - 1. 16 CFR 313.3(e)(1) — “Consumer means an individual who obtains or has obtained a financial product or service from you that is to be used primarily for personal, family, or household purposes, or that individual’s legal representative.”
 - 2. 16 CFR 313.3(e)(2)(v) — “An individual who is a consumer of another financial institution is not your consumer solely because you act as agent for, or provide processing or other services to, that financial institution.”
- C. Commercial transactions are not covered by the regulation.
 - 1. Services provided for or to a business entity are not covered by the rule.
 - 2. “Commercial transaction” is not defined by the regulation. Look to TILA regulations for definition of “personal, family and household purposes.”
 - 3. An estate is considered a natural person for purposes of the rule. Services provided to a personal representative, guardian, conservator, or legal representative on behalf of an individual (e.g. the attorney for an individual) are covered by the rule.
- D. Higher levels of protection are afforded to customers (customers always receive a privacy policy disclosure). A customer is a person who purchases a financial service or product. A customer relationship may be established by signing a contract or order for services, or by paying for services; however, paying for services is not the determining factor in deciding whether a customer relationship has been established.
- E. Only non-public information is protected.
 - 1. Non-public information includes, for example, information received from the parties; information received from a real estate professional, mortgage broker or lender, or other settlement service provider; information obtained in providing a service or product; and passive information obtained from a web site. The existence of a customer or client relationship is protected.
 - 2. Information that you can show is available from public sources (e.g. real property records, newspapers, or phone books), and compilations of information that cannot be used to identify any

consumer or customer (studies containing blind data), are not protected by the rule.

- F. The key feature of federal protection is the disclosure of the consumer's right to opt-out of the sharing of information with third parties.
1. Provide a financial privacy disclosure at the time a customer relationship is established. Provide a financial privacy disclosure to consumers if protected information will be given to a non-affiliated party. Post a financial privacy disclosure on your web site, and ask the consumer if they will agree to consent to receive it electronically.
 2. A "short form" disclosure may be provided to consumers who will not be customers. A short form disclosure must state that your privacy disclosure is available upon request and explain a reasonable means by which the consumer may obtain the disclosure. The consumer must be able to call a toll free number to ask for a privacy disclosure, or request a privacy disclosure at your office.
 3. The financial privacy disclosure must disclose: categories of nonpublic personal information that you collect; categories of nonpublic personal information that you disclose; categories of affiliates and nonaffiliated third parties to whom you disclose nonpublic personal information; categories of nonpublic personal information about your former customers that you disclose; an explanation of the consumer's right to opt out of the disclosure of nonpublic personal information to nonaffiliated third parties, including the method(s) by which the consumer may exercise that right at that time; notices regarding the ability to opt out of disclosures of information among affiliates; your policies and practices with respect to protecting the confidentiality and security of nonpublic personal information; and a statement that you make disclosures to other nonaffiliated third parties as permitted by law. If you provide information to affiliated entities, your policies regarding sharing of "credit" information under the Fair Credit Reporting Act must also be disclosed.
 4. A disclosure must be provided when the customer relationship is established. Disclosures may be mailed or hand delivered. One disclosure may list all affiliates, and one disclosure may be provided to co-customers; however, each individual may request his or her own copy of the disclosure.
 5. Delivery issues for web sites: ask the consumer or customer to agree to receive the notice from a web page as a necessary step to request title services online. The consumer must acknowledge the ability to save or print the disclosure. If the consumer does not (or cannot) agree to these terms, a paper disclosure must be mailed or otherwise delivered to the consumer.

- G. The consumer must be allowed at least 30 days to opt out of information sharing. The consumer may opt out of future sharing. The disclosure must provide a form that can be mailed back or a toll-free number to opt out. New disclosures and opt out periods must be provided if the prior disclosure does not adequately describe the proposed sharing. If an opt-out is required under the Fair Credit Reporting Act, this opt-out must be provided as well as the financial privacy opt out (both must be explained and, if a form is used to opt out, a separate form must be provided for each opt-out right).
- H. You must maintain procedures to protect customer and consumer information. Train employees and require confidentiality pledges. There are no specific requirements in the rule. At a minimum, we suggest:
 - 1. Limiting access to information to employees who need the information to do their job.
 - 2. Require customers to provide a password to gain information over the phone.
 - 3. Require picture ID for releasing documents.
 - 4. Lock up confidential information when not open for business.
- I. Exceptions permitting immediate sharing of information with third parties:
 - 1. Express written consent. See Section 15 (a)(1).
 - 2. Implied consent (e.g. a written application for a mortgage loan) under Section 14 of the rule.
 - 3. Information provided to third parties under a joint marketing agreement and confidentiality agreement (the “safe harbor”). See Section 13. This exception may also be utilized with your service providers.
 - 4. You may provide information immediately to a government agency that reviews files. The government agency should provide a certification that it has complied with the rule.
 - 5. You may provide information immediately to your rating agencies, credit bureaus, and in due diligence reviews in mergers.
 - 6. You may provide information immediately to borrowers’ attorneys, guardians and trustees.
 - 7. You may provide information immediately to others to protect the confidentiality or security of your records or to prevent a fraud.
 - 8. You may provide information to a third party to resolve a consumer dispute or inquiry.
- J. A separate law, the Children’s Online Privacy Protection Act (COPPA), is implemented by FTC rules at 16 CFR Part 312. Web sites directed to

children or that knowingly collect information from children under age 13 must post a notice of their information collection practices on the home page and on each page where information is collected. Parents have the right to review the information collected, prohibit further dissemination of the information (and ask that it be deleted), and veto participation of their children in the web site. The Children's Online Privacy Protection Act (COPPA) includes a provision enabling industry groups or others to submit for Federal Trade Commission (FTC) approval self-regulatory guidelines that implement the protections of the FTC rule. The COPPA requires the FTC to act on a request for "safe harbor" treatment within 180 days of the filing of the request, and after the proposed guidelines have been subject to notice and comment. The FTC has also approved several safe harbor review and certification programs sponsored by trade associations. Section 312.10 of the final rule sets out the criteria for approval of guidelines and the materials that must be submitted as part of a safe harbor application.

- K. The notice required by the FTC rule must include information about:
1. The types of personal information they collect from kids (for example, name, home address, email address or hobbies).
 2. How the site will use the information (for example, to market to the child who supplied the information, to notify contest winners or to make the information available through a child's participation in a chat room).
 3. Whether personal information is forwarded to advertisers or other third parties.
 4. The name of a contact at the site.
 5. In many cases, a site must obtain parental consent before collecting, using or disclosing personal information about a child. Consent is not required when a site is collecting an email address to respond to a one-time request from the child, provide notice to the parent, ensure the safety of the child or the site, or send a newsletter or other information on a regular basis as long as the site notifies a parent and gives them a chance to say no to the arrangement. Parents must be allowed to review information on file by the site owner or proprietor, and the site owner must be able to verify the identity of the parent. Parents can revoke their consent and ask that information about their children be deleted from the site's database. When a parent revokes consent, the website must stop collecting, using or disclosing information from that child. The site may end a child's participation in an activity if the information it collected was necessary for participation in the website's activity.
- L. The European Union's (EU) comprehensive privacy legislation, the Directive on Data Protection (the Directive), became effective on October

25, 1998. It requires that transfers of personal data take place only to non-EU countries that provide an “adequate” level of privacy protection. There are significant differences between the EU Directive and state and federal privacy laws. The Directive can be found at http://www.cdt.org/privacy/eudirective/EU_Directive_.html. Companies that do business in the EU should consider qualifying for the safe harbor under the Directive. Further information concerning the safe harbor can be found at <http://www.export.gov/safeharbor/>.

- M. FTC Financial Privacy Rules, Article V of the GLB Act and other financial privacy resources may be found at <http://www.ftc.gov/privacy/glbact/index.html>, <http://www.ftc.gov/bcp/conline/pubs/buspubs/coppa.htm>, and http://www.complianceheadquarters.com/Privacy/Privacy_Research/privacy_research.html. Information about the COPPA safe harbor program is found at <http://www.ftc.gov/privacy/safeharbor/shp.htm>.

III. Account Aggregation (Screen Scraping)

- A. Account aggregation is a service in which a computer program uses your access rights (with your written consent) to other web sites to obtain and display a consolidated statement of your accounts.
- B. Some account aggregation services are taking this one step further by adding the power to make payments from the various accounts and transfers between accounts. This is usually accomplished by a third party service that utilizes the National Automated Clearing House Association (NACHA) system, similar to electronic debits you authorize in an automatic loan payment system.
- C. In the future, you may have one service that not only allows you to see account information, pay bills, and make transfers, but also provides intelligent investment services (e.g. automated trades based on predetermined stop limits), prepares tax returns, orders groceries, shops for services and goods, and budgets your expenses. Issues facing this fledgling industry include:
 - 1. Licensing: Regulators and state laws are not prepared to accommodate this service. At present, most state laws do not anticipate these services. In most jurisdictions, a license is not required if the business has no discretionary authority and does not hold the property of the customer.
 - 2. NACHA rules: The business can be charged back for transferring funds that later are determined were not available (e.g. the customer deposited a bad check in his account, so the funds were never collected and could not be spent).

3. Patents of business methods: Business methods may be patented if they involve computerized processes. Patent applications do not become public until they are approved—sometimes years after the initial application. As a result, potential patent infringements may arise after a financial service product is developed and implementation begins.
4. Security: How do you convince a customer that the system is secure? How do you protect against outside and inside identity theft?
5. Marketing: The most successful electronic financial services are offered by an institution that offers Internet services an adjunct to brick and mortar branches. Internet-only banks have not been profitable. Public acceptance of technology does not occur overnight. Personal computers recently became a common household appliance, fifteen years after the first commercial product.

Web Sites For Real Property Law Attorneys

General Statutory and Court Opinion Sites

<http://www.michiganlegislature.org/mileg.asp?page=MCLBasicSearch> (M.C.L.)

<http://www.michiganlegislature.org> (Michigan legislation)

<http://www.michigan.gov/orr> (Michigan Administrative Code)

<http://www.law.cornell.edu/states/listing.html> (laws and court decisions of other states, from Cornell Law School's Legal Information Institute)

<http://guide.lp.findlaw.com/11stategov/> (laws and court decisions of other states from Findlaw)

http://www.law.cornell.edu/topics/state_statutes.html (state law by topic from Cornell Law School's Legal Information Institute)

<http://www.abanet.org/buslaw/cfs/survey/home.html> (state commercial law survey from the ABA)

<http://www.lawresearch.com/v2/practice/ctindex8.htm> (links to various legal subject areas from Law Research)

<http://c2.com/w2/bridges/LnetStatePages> (limited liability company law research page)

LISTSERVS (Discussion Groups)

There are several ABANET listservs and other listservs on the Internet of interest to Section members:

DIRT

DIRT is a real estate lawyers' discussion group. The purpose is to exchange commentary and information concerning legal issues affecting transactions in real estate. The list

consists primarily of attorneys in private practice and law professors specializing in real estate matters. There are also some real estate brokers and attorneys with public agencies and banks. Message volume varies, but commonly runs 5 to 20 messages per workday. A real property law case note (a “Daily Development”) is posted and discussed by the members of the listserv every workday. To subscribe, send the message “subscribe Dirt” to

DIRTrequest@listserv.umkc.edu

DIRT has an alternate, more extensive coverage that includes not only commercial and general real estate matters but also focuses specifically upon residential real estate named “BrokerDIRT.” Residential specialist attorneys, title insurers, lenders and others interested in the residential market will want to subscribe to this alternative list. If you subscribe to BrokerDIRT, it is not necessary also to subscribe to DIRT, as BrokerDIRT carries all DIRT traffic in addition to the residential discussions.

To subscribe to BrokerDIRT, send the message “subscribe BrokerDIRT” to

DIRTrequest@listserv.umkc.edu

Finally, DIRT has a Web Page where you may find previous case notes at:

<http://cctr.umkc.edu/dept/dirt/>

E-DIRT

E-DIRT is a new, quarterly, electronic publication of the ABA RPPT Section which will bring substantive information and news of Section and committee activities to all Section members via e-mail. This Newsletter replaces and expands the focus of the Real Estate Finance Newsletter or “Green Sheets” of the Section’s Commercial Real Estate Finance Committees that was distributed by hard copy.

The E-DIRT Newsletter is prepared by the Michael Goler, its Managing Editor, and Cheryl Kelly, Acquisitions Editor ckelly@thompsoncoburn.com

If you have technological questions about E-DIRT, contact Rob King, RPPT Section Technology Manager at: kingr@staff.abanet.org (312) 988-5540

3DT

Deals, Dirt, Death and Taxes is a discussion group of the Real Property, Probate & Trust Law Section and covers estate planning for Businesses and Real Estate. Topics covered will include: entity selection, valuation, business continuity and succession, environmental problems and related income and wealth transfer tax issues.

Web Based archives are now available.

Subscribe to 3dt ABA-PTL

The Probate Division of the Real Property, Probate & Trust Law Section of the American Bar Association first opened its own Internet listserv, called “ABA-PTL” (stands for Probate & Trust Law) on July 31, 1995 at USA.NET. This list, which now has more than 1345 subscribers, is intended primarily for the use of Section members and related professionals so they can discuss estate planning and administration issues by e-mail. In

May of 1997, this list moved to the server host at HOME.EASE.LSOFT.COM. On July 1, 2000 this list moved to its new permanent server host at the ABA's called MAIL.ABANET.ORG.

To subscribe to this list, go to the List's "join or leave" page at:

<http://mail.abanet.org/scripts/wa.exe?SUBED1=aba-ptl&A=1>

or, you can send an e-mail message to listserv@mail.abanet.org. Do not put anything on the Subject line in the Header unless you have to (i.e., AOL users). In the message part simply put the text:

subscribe aba-ptl (Your Real Name)

After being notified to do so and confirming your subscription, you will receive an e-mail message from mail.abanet.org telling you that you have successfully subscribed, welcoming you to the listserv, and giving you some essential information about it. The first thing you should do is SAVE this information. The second thing you should do is send a private e-mail message to the owner of the lists at aba-ptl-request@mail.abanet.org with the words "My ABA Number" in the Subject line, and only your ABA Membership Number [ABA No. 3456789] in the text of the message. This is so your membership status in the ABA and the Section can be verified should this list ever be changed back to a closed list for Section members only as it was when it first came into existence.

For more information about this new listserv and how to subscribe to it, send an e-mail text message reading "info aba-ptl" to listserv@mail.abanet.org.

In order to view a Web based archive of all the e-mails that have been posted to this list since April of 1997, point your browser at the ABA-PTL List Archive URL. You can sort through the messages that are in this archive by author, subject or date.

The new URL for this archive is: <http://mail.abanet.org/archives/aba-ptl.html>.

In addition, a backup duplicate of this archive is currently being maintained and can be found at URL: <http://home.ease.lsoft.com/archives/aba-ptl-pub.html>.

HOMEFORUM

Homeforum is the discussion group of the ABA Forum on Affordable Housing and Community Development Law. The Forum was created to provide an interdisciplinary location for real estate, business, tax, land use and other lawyers to share their interests and concerns about affordable housing. Homeforum was started to facilitate communication among members. However, the list is open, and not restricted at this time to the Forum's members.

The list is intended to discuss affordable housing issues of interest to all. Most pressing at this time is updates on the changes at HUD. However, practice tips and other legal questions are also welcome.

Subscribe to Homeforum

To write to the list, send your messages to homeforum@abanet.org For further information, please email tucok@staff.abanet.org, or the Forum's Internet and Technology Chair, Forrest Milder, at fmilder@brfg.com.

LNET-LLC

LNET-LLC is a discussion list on limited liability companies, limited liability partnerships and other unincorporated business entities. Its members range from lawyers to certified public accountants, and includes professors, law students and graduate students in accounting. Information concerning joining the listserv can be found at its Home Page.

CondoLawyers

<http://groups.yahoo.com/group/CondoLawyers/>

A Discussion Forum for Members of the Legal Profession Serving Community Associations.

CondoFairHousing

<http://groups.yahoo.com/group/CondoFairHousing/>

A fair housing discussion forum for condominium and homeowners associations practitioners.

Discussion Listserv Archives

<http://www.stcl.edu/lnet-llc/lnet-llc.html> (discussion list for limited liability company issues).

<http://mail.abanet.org/archives/aba-ptl.html> (discussion list for estate planning and administration).

<http://mail.abanet.org/archive/3dt.html> (discussion list for estate planning for Businesses and Real Estate).

<http://groups.yahoo.com/group/lnet-llc> or alternate site

<http://www.stcl.edu/lnet-llc/lnet-llc.html> (discussion list for limited liability companies and partnerships - discussions include choice of entity for businesses).

Compliance Resources

<http://www.cis.state.mi.us/ofis> (Michigan Office of Financial and Insurance Services)

<http://kirchman.com/comply/> (Kirchman Regulatory Service Manual a.k.a The Big Orange Book)

<http://www.moneypage.com/forum.htm> (The Money Page Forum - a banking compliance officer forum)

<http://www.bankersonline.com/ubbthreads/ubbthreads.php> (BankersOnline.com, a compliance officer forum)

<http://www.complianceheadquarters.com/Discussions/discussions.html> (Compliance Hedquarters, a compliance officer forum sponsored by Bankers Systems, Inc.)

<http://www.ffiec.gov/hmda/> (Federal Financial Institution Examination Council Home Mortgage Disclosure Act web page)

<http://www.moneypage.com/regulatoryagencies/content.htm> (Links to federal banking regulators from the Money Page)

<http://www.occ.treas.gov/aprwin.htm> (Annual Percentage Rate software from the Office of the Comptroller of the Currency)

<http://www.mbaa.org/resources/predlend/> (Mortgage Bankers Association predatory lending page)

<http://www.fdic.gov/regulations/compliance/respa/index.html> (HUD software to calculate minimum escrow account balance and the aggregate adjustment of single item accrual escrow calculation)

<http://www.mbaa.org/members/commit/state-leg-reg-compl/lib/escrowchart.html> (summary of state laws requiring payment of interest on escrow balances)

<http://thebankingchannel.com/regulatory/story.jsp?story=TBCL0LE8SGC> (federal banking agency publication update from The Banking Channel)

<http://www.privacyheadquarters.com> (financial privacy issues)

<ftp://ftp.ny.frb.org/prime/Prime.txt> (history of the prime rate)

<http://www.w3c.org> (World Wide Web Consortium - Americans With Disabilities Act Web Site Standards)

<http://www.fema.gov/nfip/mpurfi.htm> (FEMA's Mandatory Purchase of Flood Insurance Guidelines)

<http://www.ffiec.gov/geocode/default.htm> (FFIEC census tract finder and information)

Domain Name Lookup and Internet Legal Issues

<http://www.networksolutions.com/cgi-bin/whois/whois> (lookup the owner of a web page)

<http://www.occ.treas.gov/netbank/netbank.htm> (Office of the Comptroller of the Currency Internet Banking Page)

<http://www.perkinscoie.com/casedigest/default.cfm> (digest of Internet Law cases from Perkins Coie LLP)

Estate Planning

<http://www.estateplanninglinks.com/>

<http://leimberg.com/>

<http://www.lawresearch.com/v2/practice/ctrust.htm>

Federal Documents and Resources

http://www.access.gpo.gov/su_docs/aces/aces140.html (Federal Register from the National Archives - federal regulations)

<http://www.access.gpo.gov/nara/cfr/index.html> (Code of Federal Regulations from the National Archives)

http://www.irs.ustreas.gov/forms_pubs/index.html (IRS forms and publications)

http://www.irs.ustreas.gov/bus_info/bullet.html (IRS Bulletins)

http://www.findlaw.com/10fedgov/judicial/district_courts.html (links to Federal District Court web pages from Findlaw)

<http://www.epa.gov/lead/leadbase.htm> (EPA lead based paint page)

http://www.landlord.com/landforms_main_hud_forms_frame.htm (HUD lead based paint page)

<http://www.ftc.gov/bc/hsr/hsr.htm> (Hart-Scott-Rodino Act pre-merger notification page)

FNMA, FHLMC, FHA and VA Seller/Service Manuals

<http://www.adfinet.com/> (registration is free and required)

<http://www.homeloans.va.gov/handbook.htm> (Veterans Administration Loan Guaranty Manuals)

<http://www.hudclips.org/cgi/index.cgi> (FHA handbooks, forms, mortgagee letters, etc.)

General Legal Contracts and Forms

<http://www.utsystem.edu/OGC/IntellectualProperty/dbmock.htm>

<http://www.azlegaldocs.com/forms/alldocs.php>

http://www.landlord.com/landforms_main_hud_forms_frame.htm (landlord/tenant forms)

<http://www.sba.gov/library/sharewareroom.html> (Business Shareware from the Small Business Administration)

<http://www.officedepot.com/BusinessTools/forms/default.asp?SID=J9DEN1VBREX18HATX7KV3EX379DK2U02&PP=1> (General forms from Office Depot)

Insurance Links

<http://www.naic.org/1regulator/usamap.htm> (links to state insurance regulators from the NAIC)

<http://www.insurance-finance.com/insurance.htm> (Insurance and Finance Research Station - more insurance links)

Legal Research

<http://www.usc.edu/dept/law-lib/legal/journals.html> (links to legal journals on the Internet)

<http://www.cardreport.com/laws/credit-laws.html> (credit and banking laws and regulations)

Phone Number Lookup and Reverse Lookup, Maps, Etc.

<http://www.switchboard.com/>

<http://www.555-1212.com>

<http://www.mapquest.com>

<http://www.smartpages.com/whitepages/> (Ameritech white pages name, address or telephone number lookup)

<http://www.lawresearch.com/v2/practice/ctindex8.htm> (Canadian business information from Industry Canada)

Real Estate Lending Documents

<http://www.realdocs.com/Webpdfs/>

http://www.ncbs.com/lending/forms_disc.htm

<http://www.freddiemac.com/corporate/uniform/> (Freddie Mac and Fannie Mae Single Family Loan Documents)

<http://www.freddiemac.com/multifamily/uniform.htm> (Freddie Mac Multifamily Residential Loan Documents)

<http://www.capitalconsortium.org/> (standard commercial real estate loan forms from the Capital Consortium)

http://mortgage-investments.com/Real_estate_and_mortgage_Forms/form_fr.htm

Real Estate Transaction Resources and Forms

<http://www.argosylegal.com/convey01.htm>

http://www.globalresourcenetwork.com/tools_renotes.html

<http://www.domania.com/homepricecheck/index.jsp?tl=c1> (home selling price lookup from Domania)

<http://homepricecheck.excite.com/street.html> (home selling price lookup from Yahoo)

<http://www.erisk.com/> (eRisk - risk management issues)

http://www.virtualchase.com/resources/real_estate.shtml (various links from Ballard Spahr Andrews & Ingersoll, LLP)

<http://www.unclaimed.org/> (research unclaimed escheated property)

<http://www.pac-info.com/> (records search page)

<http://www.netronline.com/frameset.asp?page=Michigan> (links to Michigan County home pages)

<http://www.zanatec.com/multiwin.html> (addresses and phone numbers of registers of deeds)

http://www.titlelaw-newyork.com/_vti_bin/shtml.exe/index.html or

<http://www.titlelaw-newyork.com/Forms/> (New York real estate and title insurance forms)

<http://www.nysba.org/sections/realprop/silent2.htm> (landlord's checklist of silent lease issues, from the NYS Bar Assn.)

<http://www.ncsc.dni.us/NCSC/TIS/TIS99/ELECTR99/Elecfil1.htm> (National Center for State Courts electronic filing web page)

<http://www.attsbh.com/titlelawannotated/index.htm> (links to housing resources)

Search Engines

<http://www.google.com> (Google - an intelligent meta search engine, used to look up keywords)

<http://www.lawcrawler.com> (legal search engine - Google works better in many instances)

<http://www.invisibleweb.com/> (topical search engine)

Securities Law

<http://www.seclaw.com/Welcome.shtml> (securities laws, news and forums)

Title Insurance Underwriting Manuals and Legal Articles

<http://www.nationaltitleinformation.ctt.com/home/userhome.shtml> (Chicago Title)

<http://nt.firstam.com> (First American underwriting manual)

<http://www.firstam.com/faf/reference/main.html> (First American links to articles and title insurance premium calculator)

<http://199.253.17.17/vu/vumainmenu.htm> (Stewart Title)

Trademarks

<http://tess.uspto.gov/bin/gate.exe?f=tess&state=8hnl3m.1.1> (look up trademarked names)

Trade Secrets Research

<http://execpc.com/~mhalign/>

UCC Article 9 Links

<http://www.sos.state.mi.us/ucc/index.html> (Michigan Secretary of State UCC web page)

<http://www.krahmer.net/>

<http://www.abanet.org/buslaw/cfs-ucc/ucc/article9/home.html>

<http://nass.stateofthevote.org/sos/sosflags.html> (links to the Secretaries of States web pages - visit the Secretaries of States for UCC filing information)

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