



Announcement CL 2018-02-14
Increasing Fees on a Closing Disclosure
(Revised)
February 14, 2018

As the industry is acutely aware, there has been some uncertainty and differing legal interpretations related to the permissibility of re-disclosing increases in settlement charges on a Closing Disclosure for the purposes of determining whether the Closing Disclosure was prepared in good faith in the event that the initial Closing Disclosure was issued greater than three (3) Business Days prior to Consummation (the "Rule").

Impac Mortgage Corp. ("Impac") has received extensive feedback regarding its January 23, 2018 announcement "Increasing Fees on a Closing Disclosure."

As such, Impac is going to permit correspondent sellers to make their own interpretation of the Rule.

This Announcement shall not be deemed as Impac providing guidance regarding the Rule or limiting the representations and warranties of its correspondent sellers.

We thank you for your continued business.

If you have any questions, contact your Relationship Manager at 888-850-0259 Option 1 or your Account Executive.