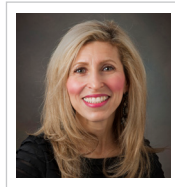


# Here's what prominent industry compliance attorneys are saying about the optional **NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program**



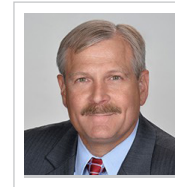
“When dealers concerned about the CFPB campaign against dealer reserve ask how best to protect themselves, I advise that they should adopt a fair lending policy that removes individual discretion in setting rates. The NADA/NAMAD/AIADA policy is the gold standard for a policy that creates rate consistency in the F&I department. Dealers that have fully implemented it and insist on continuing compliance not only improve protection against losses, they improve productivity by preventing shortcuts.”

**Michael Charapp, Esq.**  
*Charapp & Weiss, LLP*



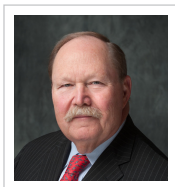
“Unlawful discrimination claims are not going away. And, the U.S. Supreme Court’s recent Inclusive Communities decision not only confirms this, but will likely fuel regulatory and plaintiff action in this realm. Unfettered F&I discretion is no longer viable. The NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program, when implemented properly and followed, puts the dealer in the best possible position to respond to unlawful discrimination challenges.”

**Patty Covington, Esq.**  
*Hudson Cook, LLP*



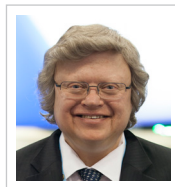
“The NADA compliance programs are the best in the industry, and the NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program is no exception. It advocates dealer adoption of a comprehensive Fair Credit compliance program that includes several prudent steps, as well as the creation of evidence through the use of the Dealer Participation Certification Form to successfully respond to finance source inquiries and defend against regulatory investigations.”

**Daniel J. Doman, Esq.**  
*RouteOne LLC*



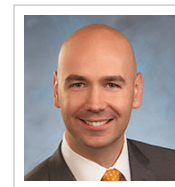
“I believe the NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program can resolve the issues raised by the CFPB relating to discretionary pricing in dealer interactions with consumers, assuming it is faithfully executed as described by NADA.”

**Rick Hackett, Esq.**  
*Hudson Cook, LLP*



“In light of the Supreme Court’s ruling in the Inclusive Communities case, and given the Department of Justice’s stated support for the principles embodied in the NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program, adopting and applying the NADA/NAMAD/AIADA program gives a dealer the best possible defense to a claim of disparate impact credit discrimination by whomsoever asserted.”

**Randy Henrick, Esq.**  
*Dealertrack Technologies, Inc.*



“The NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program, when properly implemented, provides as close to a safe harbor from federal credit discrimination claims as anything out there. In our experience, dealers who implement the NADA/NAMAD/AIADA program are uniquely equipped to respond to the continual parade of lenders seeking information on dealership finance compensation practices.”

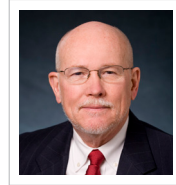
**Jonathan Morrison, Esq.**  
*Auto Advisory Services, Inc.*

What prominent industry compliance attorneys are saying about the optional  
**NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program**



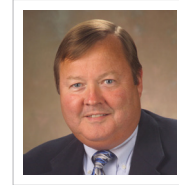
“The NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program is very well thought out and an effective way for dealers to manage their ECOA risk in pricing credit to customers.”

**Jean Noonan, Esq.**  
*Hudson Cook, LLP*



“I strongly recommend implementation of the NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program to our dealer clients. In my opinion, it a well-designed program that should be relatively easy to implement and that should provide a dealership with a strong defense against alleged Equal Credit Opportunity Act violations based on disparate impact.”

**Paul Norman, Esq.**  
*Boardman & Clark LLP*



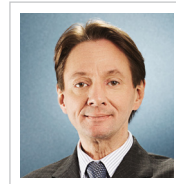
“Every dealer should adopt the NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program. It is based upon established law which will protect dealers from liability. The NADA/NAMAD/AIADA program is an excellently designed program and its implementation by any dealer should be relatively simple.”

**Terrence J. O'Loughlin, J.D., M.B.A.**  
*Reynolds and Reynolds*



“Dealers need to build a defensible position against the CFPB's scrutiny of dealer assisted financing. The NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program, with its roots in government approved precedent, provides dealers with the defense they need against claims of discriminatory conduct in credit pricing.”

**Shaun K. Petersen, Esq.**  
*MacMurray Petersen & Shuster LLP*  
*(counsel to National Independent Automobile Dealers Association)*



“To survive and thrive in today's regulatory environment, dealers absolutely need to adopt a fair credit policy and use it every day with every deal. The NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program is an excellent tool for doing just that. I highly recommend it.”

**Halbert B. Rasmussen, Esq.**  
*Arent Fox LLP*



“CU Direct understands that an essential part of its mission is to help credit unions better serve their member-owners. Clear, consistent and compliant fair lending policies are one of the most effective ways to do just that while mitigating the risk of potential disparate impact claims. By adopting and implementing a program such as the NADA/NAMAD/AIADA Fair Credit Compliance Policy & Program, dealers are better positioned to partner with lenders while limiting their own exposure.”

**Thomas H. Wolfe, Esq.**  
*Moore Brewer Wolfe Jones Tyler & North*  
*(counsel to CU Direct)*