

Avoiding Mortgage Payoff Fraud

Presented by:
LEGAL EDUCATION DEPARTMENT
of
Attorneys' Title Fund Services, LLC

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AVOIDING MORTGAGE PAYOFF FRAUD

Tips and Tricks for Fund Members

MICHAEL ROTHMAN, ESQ.
Senior Manager, Legal Education Dept.

AVOIDING MORTGAGE PAYOFF FRAUD

Call in for Audio

+1 415-655-0052
Access Code: 713-426-069

Materials

Download PDF document in control panel

Florida Bar

General 1.0

Technology 1.0

Real Estate 1.0

- See materials for Course No.
- Log-in to FL Bar for credit

Dept. of Financial Services Licensees only:

CREDIT: 1.0 Title

Please login on time and remain online for the entirety for credit

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- **Email completed Student Acknowledgement to DFSCREDITS@thefund.com**

NALA

Certificate included in materials
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To Obtain Handout(s)

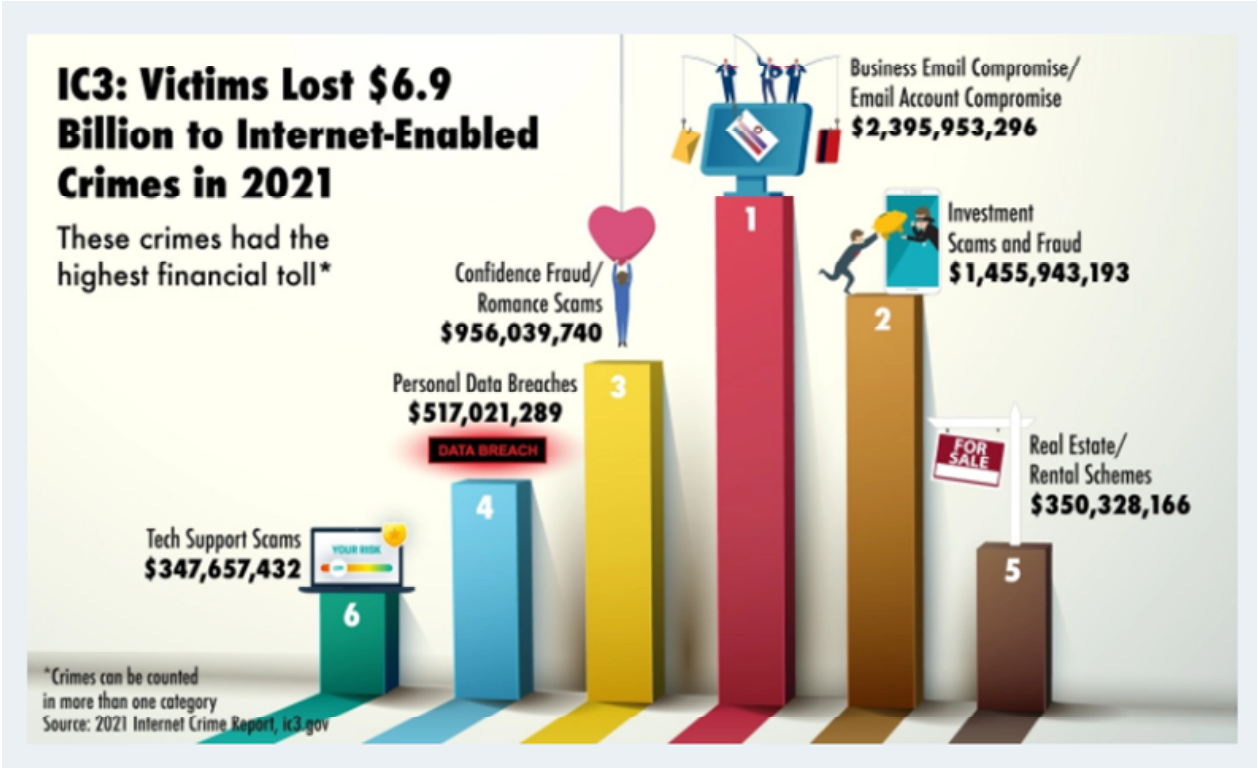


1. Locate control panel
2. Click red arrow
3. Find “Handouts:”
4. Click on the triangle
5. Click on the PDF

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3

LATEST STATS

FBI 2021 INTERNET CRIME REPORT (Mar. 22)



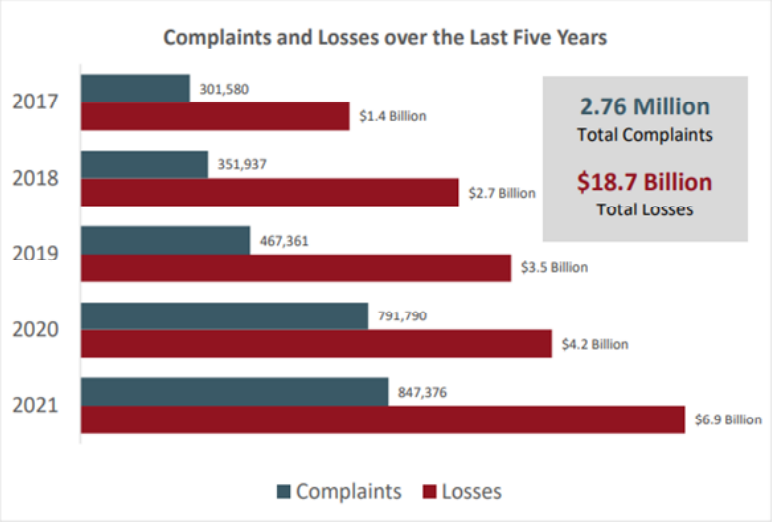
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FBI 2021 INTERNET CRIME REPORT (Mar. 22)

IC3 COMPLAINT STATISTICS

LAST 5 YEARS

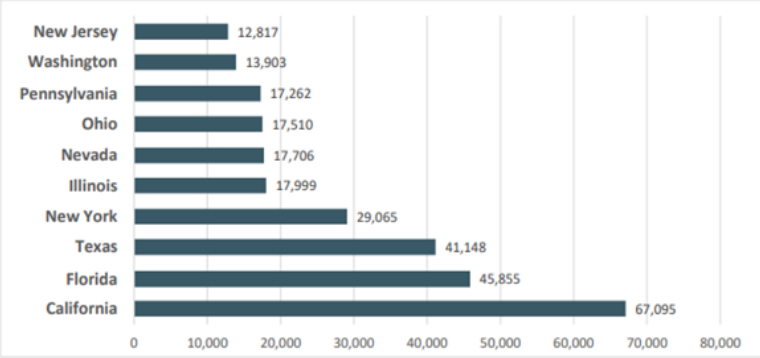
Over the last five years, the IC3 has received an average of 552,000 complaints per year. These complaints address a wide array of Internet scams affecting victims across the globe.[3]



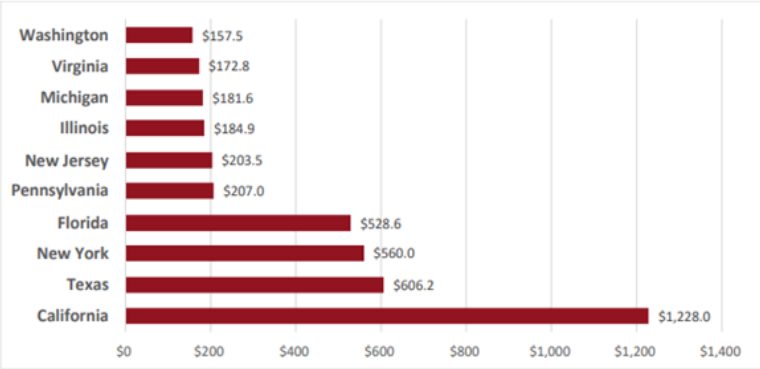
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FBI 2021 INTERNET CRIME REPORT (Mar. 22)

2021 - Top 10 States by Number of Victims[19]



2021 - Top 10 States by Victim Loss in $ Millions[20]



2021 Crime Types continued

By Victim Loss

Crime Type	*Loss*	*Crime Type*	*Loss*
BEC/EAC	$2,395,953,296	Lottery/Sweepstakes/Inheritance	$71,289,089
Investment	$1,455,943,193	Extortion	$60,577,741
Confidence Fraud/Romance	$956,039,740	Ransomware	*$49,207,908
Personal Data Breach	$517,021,289	Employment	$47,231,023
Real Estate/Rental	$350,328,166	Phishing/Vishing/Smishing/Pharming	$44,213,707
Tech Support	$347,657,432	Overpayment	$33,407,671
Non-Payment/Non-Delivery	$337,493,071	Computer Intrusion	$19,603,037
Identity Theft	$278,267,918	IPR/Copyright/Counterfeit	$16,365,011
Credit Card Fraud	$172,998,385	Health Care Related	$7,042,942
Corporate Data Breach	$151,568,225	Malware/Scareware/Virus	$5,596,889
Government Impersonation	$142,643,253	Terrorism/Threats of Violence	$4,390,720
Advanced Fee	$98,694,137	Gambling	$1,940,237
Civil Matter	$85,049,939	Re-shipping	$631,466
Spoofing	$82,169,806	Denial of Service/TDos	$217,981
Other	$75,837,524	Crimes Against Children	$198,950

FLORIDA CRIME TYPE BY VICTIM LOSS

2021

Crime Type by Victim Loss			
Crime Type	*Loss Amount*	*Crime Type*	*Loss Amount*
Advanced Fee	$5,697,931	Investment	$80,840,455
BEC/EAC	$192,901,464	Lottery/Sweepstakes/Inheritance	$3,777,728
Civil Matter	$6,246,331	Malware/Scareware/Virus	$250,224
Computer Intrusion	$1,424,472	No Lead Value	$0
Confidence Fraud/Romance	$70,483,554	Non-payment/Non-Delivery	$14,705,154
Corporate Data Breach	$12,847,999	Other	$3,840,636
Credit Card Fraud	$16,784,459	Overpayment	$1,395,915
Crimes Against Children	$8,120	Personal Data Breach	$45,776,356
Denial of Service/TDos	$1,577	Phishing/Vishing/Smishing/Pharming	$5,598,867
Employment	$2,157,812	Ransomware	$1,303,065
Extortion	$5,709,948	Re-shipping	$175,695
Gambling	$44,661	Real Estate/Rental	$32,823,005
Government Impersonation	$13,130,890	Spoofing	$7,809,117
Health Care Related	$74,768	Tech Support	$33,188,465
IPR/Copyright and Counterfeit	$2,059,182	Terrorism/Threats of Violence	$422,700
Identity Theft	$36,506,050		

2020

Select a state: **Florida**⇩

Crime Type by Victim Loss			
Crime Type	*Loss Amount*	*Crime Type*	*Loss Amount*
Advanced Fee	$3,296,149	Identity Theft	$42,027,595
BEC/EAC	$115,001,364	Investment	$20,635,450
Charity	$0	Lottery/Sweepstakes/Inheritance	$3,586,188
Civil Matter	$781,952	Malware/Scareware/Virus	$115,054
Confidence Fraud/Romance	$40,173,934	Misrepresentation	$0
Corporate Data Breach	$8,310,707	No Lead Value	$0
Credit Card Fraud	$7,212,126	Non-payment/Non-Delivery	$27,055,269
Crimes Against Children	$15,007	Other	$2,965,088
Criminal Forums	$0	Overpayment	$5,006,807
Denial of Service/TDos	$6,454	Personal Data Breach	$12,526,267
Employment	$6,457,617	Phishing/Vishing/Smishing/Pharming	$2,591,820
Extortion	$4,016,115	Ransomware	$1,412,759
Gambling	$225,173	Re-shipping	$690,591
Government Impersonation	$5,379,106	Real Estate/Rental	$29,867,798
Hacktivist	$0	Spoofing	$8,688,119
Harassment/Threats of Violence	$308,820	Tech Support	$10,929,076
Health Care Related	$3,956,724	Terrorism	$0
IPR/Copyright and Counterfeit	$560,277		

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ALTA REPORT: WIRE FRAUD IS RAMPANT

According to a report from the American Land Title Association, a recent survey of their members reflected that “cyber criminals attempted to trick employees to wire funds to a fraudulent account in a third of all real estate and mortgage transactions.”

Survey: Title Professionals Targeted for Wire Fraud in a Third of all Transactions (ALTA, 4/20/21)

ALTA REPORT: WIRE FRAUD IS RAMPANT





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MORTGAGE PAYOFF FRAUD

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United States Secret Service
Global Investigative Operations Center

GIOC ALERT
21-005-I TLP GREEN

Fraud Advisory: Wire Transfer Scheme Targeting Mortgage Payoffs

The U.S. Secret Service has observed a sharp increase in fraud targeting wire transfers related to real estate sales and mortgages. Millions of mortgages are paid off each year in connection with the sale and refinancing of residential and commercial properties. Mortgage payoff statements are most often sent by mortgage lenders to title companies, who are responsible for administering payment.

This fraud scheme involves the impersonation of mortgage lenders with the intent to elicit payment. Cybercriminals send either completely fictitious or altered (changing bank account information) mortgage payoff statements to title companies. Believing the payoff statements are sent from legitimate mortgage lenders, title companies follow the wiring instructions included in the scam emails and wire funds to accounts controlled by the cybercriminals.

This scheme is particularly concerning due to the high value of individual wire transfers and frequently the lack of confirmation from lenders that wire transfers are received. This creates a unique challenge for title companies in discovering and recovering funds after they are transferred.

THEY'RE WATCHING YOU

Get clear on the fact that fraudsters are monitoring everyone's email accounts, including those of the parties and real estate agents, and have become sophisticated in their frauds.



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IT MIGHT LOOK LEGIT, BUT …

- The bad actors can divert a bank's payoff letter to themselves, modify the payoff statement, and then send it on to the disbursement agent

- The sender's email address will appear as the lender's true email address and hovering over it or right-clicking on it may (or may not) show anything out of the ordinary

STAY FOCUSED

- More often, payoff fraud occurs because of **social engineering fraud**
    - A fancy term for someone trying to trick you
- Fraudsters know when to pounce
    - Phony phone calls and emails, invoice payment fraud

CALL AND CONFIRM

The best practice is to always call a trusted number of the payee bank and confirm the payoff amount and account number.



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MORTGAGE PAYOFF FRAUD IS DIFFERENT

- Buyer's cash to close gets the most attention
  - Devastating stories, often life savings, local news

- But mortgage payoff fraud is most dangerous to title industry
  - Delayed notice of loss, title claim aspect

DON'T TRUST "UPDATED PAYOFFS"

Lenders rarely need to send revised payoff statements - so always be suspicious of any revised statement, particularly one that was not requested.



NO TIME FOR GMT

Beware payoff statements received via e-fax date stamped with reference to GMT time zone – it's very likely bogus.



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CHECK SENDER'S EMAIL ADDRESS

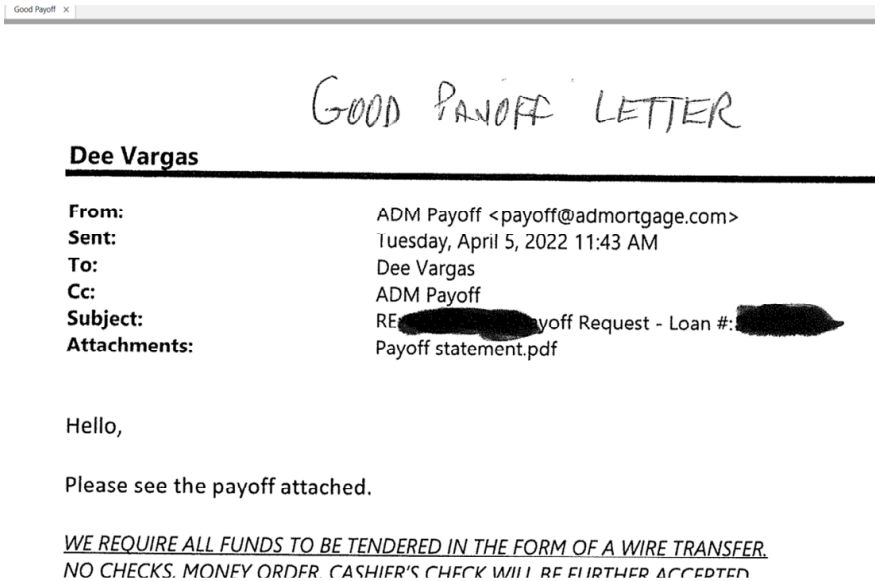
To confirm the authenticity of the sender's email address, prepare an email reply.

It may reveal that the email address for the lender has been changed to a similar, but bogus email address created by the fraudster (I vs. l) R0THMANM0RTGAGEC0MPANY.com

Hover over the sender's email address in the reply email and compare it to the address in the incoming email.

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Cautionary Tale: April 2022



GOOD PAYOFF LETTER

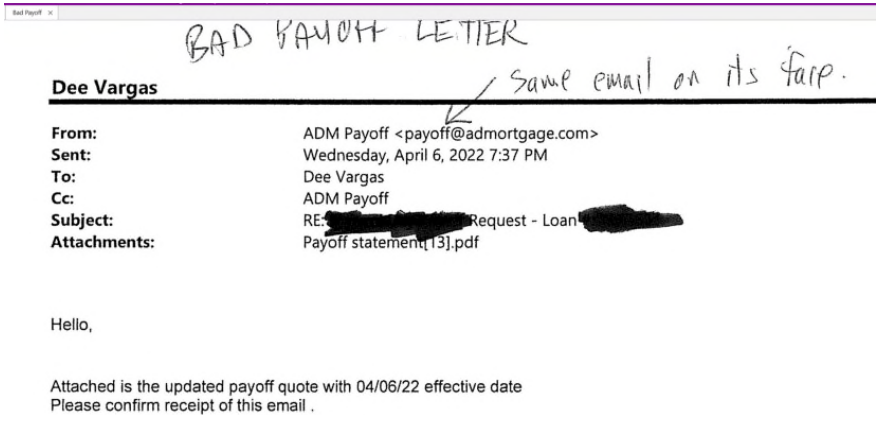
Dee Vargas

From: ADM Payoff <payoff@admortgage.com>
Sent: Tuesday, April 5, 2022 11:43 AM
To: Dee Vargas
Cc: ADM Payoff
Subject: RE: [redacted]yoff Request - Loan #: [redacted]
Attachments: Payoff statement.pdf

Hello,

Please see the payoff attached.

WE REQUIRE ALL FUNDS TO BE TENDERED IN THE FORM OF A WIRE TRANSFER.
NO CHECKS, MONEY ORDER, CASHIER'S CHECK WILL BE FURTHER ACCEPTED



BAD PAYOFF LETTER

Same email on its face.

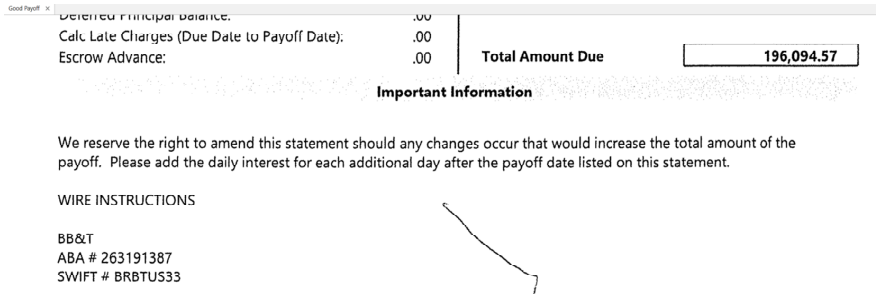
Dee Vargas

From: ADM Payoff <payoff@admortgage.com>
Sent: Wednesday, April 6, 2022 7:37 PM
To: Dee Vargas
Cc: ADM Payoff
Subject: RE: [redacted]Request - Loan [redacted]
Attachments: Payoff statement[13].pdf

Hello,

Attached is the updated payoff quote with 04/06/22 effective date
Please confirm receipt of this email .

Cautionary Tale: April 2022



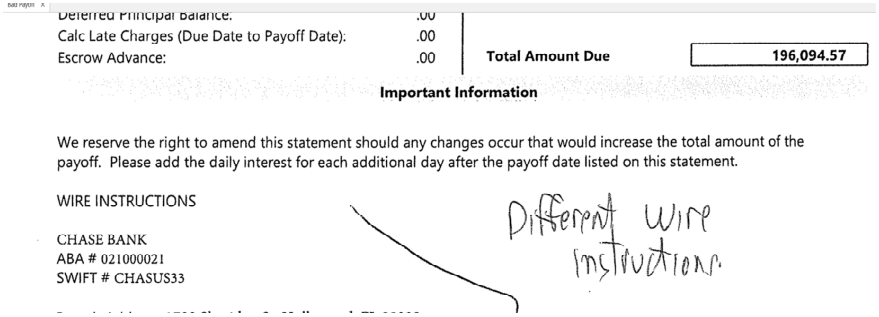
Deferred Principal Balance: .00
Calc Late Charges (Due Date to Payoff Date): .00
Escrow Advance: .00
Total Amount Due 196,094.57

Important Information

We reserve the right to amend this statement should any changes occur that would increase the total amount of the payoff. Please add the daily interest for each additional day after the payoff date listed on this statement.

WIRE INSTRUCTIONS

BB&T
ABA # 263191387
SWIFT # BRBTUS33



Deferred Principal Balance: .00
Calc Late Charges (Due Date to Payoff Date): .00
Escrow Advance: .00
Total Amount Due 196,094.57

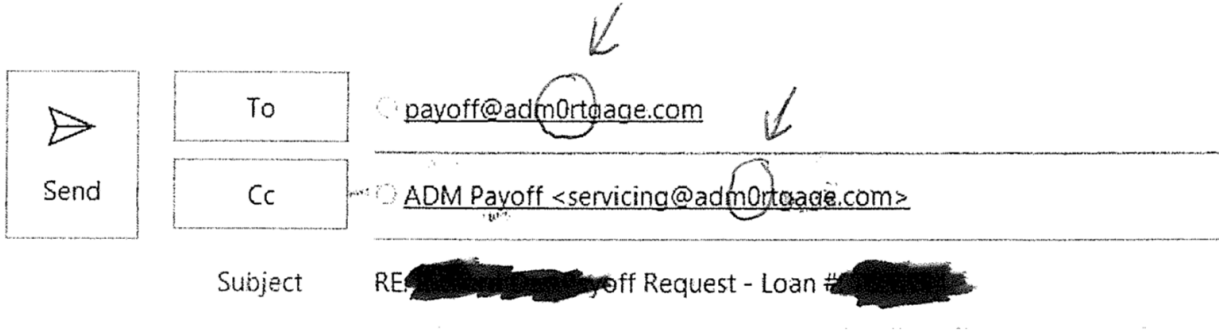
Important Information

We reserve the right to amend this statement should any changes occur that would increase the total amount of the payoff. Please add the daily interest for each additional day after the payoff date listed on this statement.

WIRE INSTRUCTIONS

CHASE BANK
ABA # 021000021
SWIFT # CHASUS33

Different Wire Instructions.



EYEBALL THE PAYOFF STATEMENT

Payoff statements should be carefully scrutinized

- Does it bear a mailing address for the disbursing agent to overnight a payoff check?
  - The bad actors are now intentionally removing mailing addresses
  - Payoff statements lacking a mailing address must be treated with a high degree of suspicion
- Does the payoff statement bear different fonts or font sizes or have skewed alignment? That may be a sign that it has been doctored
- When clicking on the wire instructions in the payoff statement, look for a moveable text box created to cover up the authentic wire instructions and text

BE SUSPICIOUS

Depository banks acting as lenders require payoff funds to be wired to itself.



If the loan payoff is due to Chase, and the payoff letter says wire to Bank of America, <u>treat it suspiciously.</u>

WATCH FOR SPELING ERRORS

Payoff statements with misspellings or grammatical errors should be treated with extra caution.



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BE ON THE LOOKOUT FOR THIS

Three red flags that you might be getting scammed:

1) New or changed contact information and wiring instructions.

2) A sense of urgency.

3) Something bad will happen if you don't act now.



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DON'T DO IT!

Never accept payoff statements in unprotected documents such as Word, Excel, or in the body of the email itself.

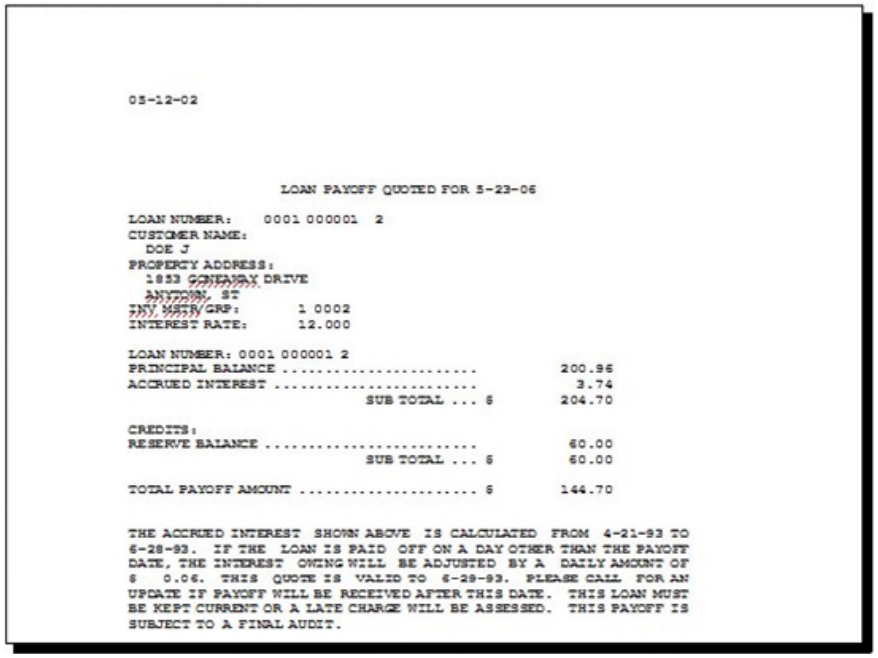




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THE LESS THE BETTER

- The best practice is for the settlement agent's office to always order the payoff statement.
- The fewer persons involved in the process of ordering and obtaining the payoff, the better



05-12-02

LOAN PAYOFF QUOTED FOR 5-23-06

LOAN NUMBER: 0001 000001 2
CUSTOMER NAME:
DOE J
PROPERTY ADDRESS:
1853 GATEWAY DRIVE
ANYTOWN, ST
INV MSTR GRP: 1 0002
INTEREST RATE: 12.000

LOAN NUMBER: 0001 000001 2
PRINCIPAL BALANCE 200.96
ACCRUED INTEREST 3.74
SUB TOTAL ... $ 204.70

CREDITS:
RESERVE BALANCE 60.00
SUB TOTAL ... $ 60.00

TOTAL PAYOFF AMOUNT ..... $ 144.70

THE ACCRUED INTEREST SHOWN ABOVE IS CALCULATED FROM 4-21-93 TO 6-28-93. IF THE LOAN IS PAID OFF ON A DAY OTHER THAN THE PAYOFF DATE, THE INTEREST OWING WILL BE ADJUSTED BY A DAILY AMOUNT OF $ 0.06. THIS QUOTE IS VALID TO 6-28-93. PLEASE CALL FOR AN UPDATE IF PAYOFF WILL BE RECEIVED AFTER THIS DATE. THIS LOAN MUST BE KEPT CURRENT OR A LATE CHARGE WILL BE ASSESSED. THIS PAYOFF IS SUBJECT TO A FINAL AUDIT.

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TIPS



TURN ON MULTI-FACTOR AUTHORIZATION

- When available

- But most certainly:
  - Anything that touches money
  - Email
  - Social media

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ADOPT A PLAN

Consider adopting the plan suggested by the American Land Title Association (https://www.alta.org/file.cfm?name=ALTA-Rapid-Response-Plan-for-Wire-Fraud-Incidents)

All written procedures should also contain the contact information for the Secret Service's Global Investigative Operations Center (GIOC) Task Force. It can be reached at GIOC@USSS.DHS.GOV or by calling (202) 406-6009. Immediately contact the Task Force and report the fraud

ADOPT A PLAN: ALTA'S 10 STEP PLAN

Step 2: Report Fraudulent Wire Transfers to the Sending and Receiving Banks.

- Contact the sending bank's fraud department and request that a recall of the wire be sent to the receiving bank because of fraud. Provide the details for the wire. Also request a recall or reversal and a Hold Harmless Letter or Letter of Indemnity.
- Ask the sending bank to initiate the FBI's Financial Fraud Kill Chain.
- Also call the receiving bank's fraud department to notify them that you have requested a recall of the wire because of fraud. Provide the details for the wire and request that the account be frozen.
- If a client or consumer was a victim and your bank/accounts were not directly involved, your client or customer will need to contact the bank themselves but you may have helpful information to share, too. Coordinate quickly!

KNOW WHO TO CALL

- Have your bank's Chief of Security's phone number on speed dial!
  - Not the branch manager
  - Not the platform manager



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KNOW WHO TO CALL

- **FBI**
- Report all suspected cases of cyber fraud to www.ic3.gov
- Jacksonville: (904) 248-7000
- Tampa: (813) 253-1000
- Miami: (754) 703-2000

- **SECRET SERVICE**
- *Secret Service's Global Investigative Operations Center (GIOC) Task Force*
- gioc@usss.dh.gov
- (202) 406-6009
- Miami: (305) 863-5000
- Orlando: (407) 648-6333
- Jacksonville: (904) 296-0133
- Tampa: (813) 228-2636

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SET UP REPETITIVE WIRE FEATURE



Set up a repetitive wire transfer feature in your production system



Include the bank wire transfer information of the entities you repeatedly wire to the most, then lock down the wire information for that entity.



If an employee receives a payoff statement containing bank wire information differing from the account information in your system, investigate.

HEY, HEY, GET ON MY CLOUD

- Store and backup to the cloud
  - Cloud-based closing software
- Cloud providers have stronger network protections
  - Better safeguard NPI data

GET OLD FILES OFF OLD SERVERS

The 2021 Florida Statutes

Title XXXIII
REGULATION OF TRADE, COMMERCE, INVESTMENTS, AND SOLICITATIONS

Chapter 501
CONSUMER PROTECTION

View Entire Chapter

501.171 Security of confidential personal information.–

(1) DEFINITIONS.–As used in this section, the term:

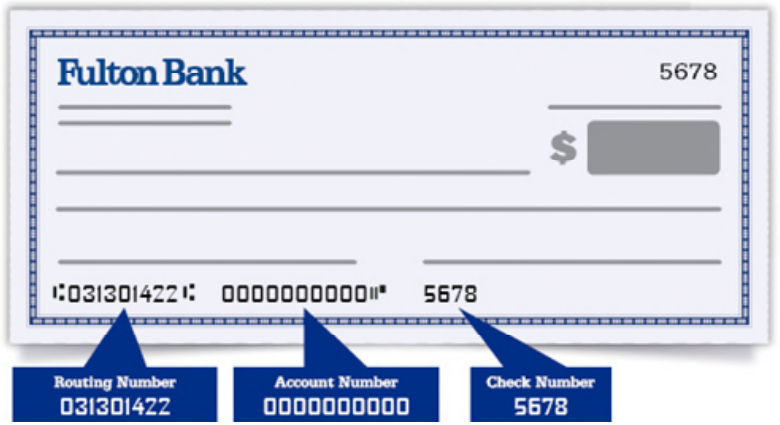
(a) "Breach of security" or "breach" means unauthorized access of data in electronic form containing personal information. Good faith access of personal information by an employee or agent of the covered entity does not constitute a breach of security, provided that the information is not used for a purpose unrelated to the business or subject to further unauthorized use.

(b) "Covered entity" means a sole proprietorship, partnership, corporation, trust, estate, cooperative, association, or other commercial entity that acquires, maintains, stores, or uses personal information. For purposes of the notice requirements in subsections (3)-(6), the term includes a governmental entity.

- Law firms & title companies are "covered entities"
- 500 or more individuals' "personal information" breached requires notice to FL Dept. of Legal Affairs
- "Personal Information" incl. SS#, drivers license, bank accts
- Notice to the affected inviduals

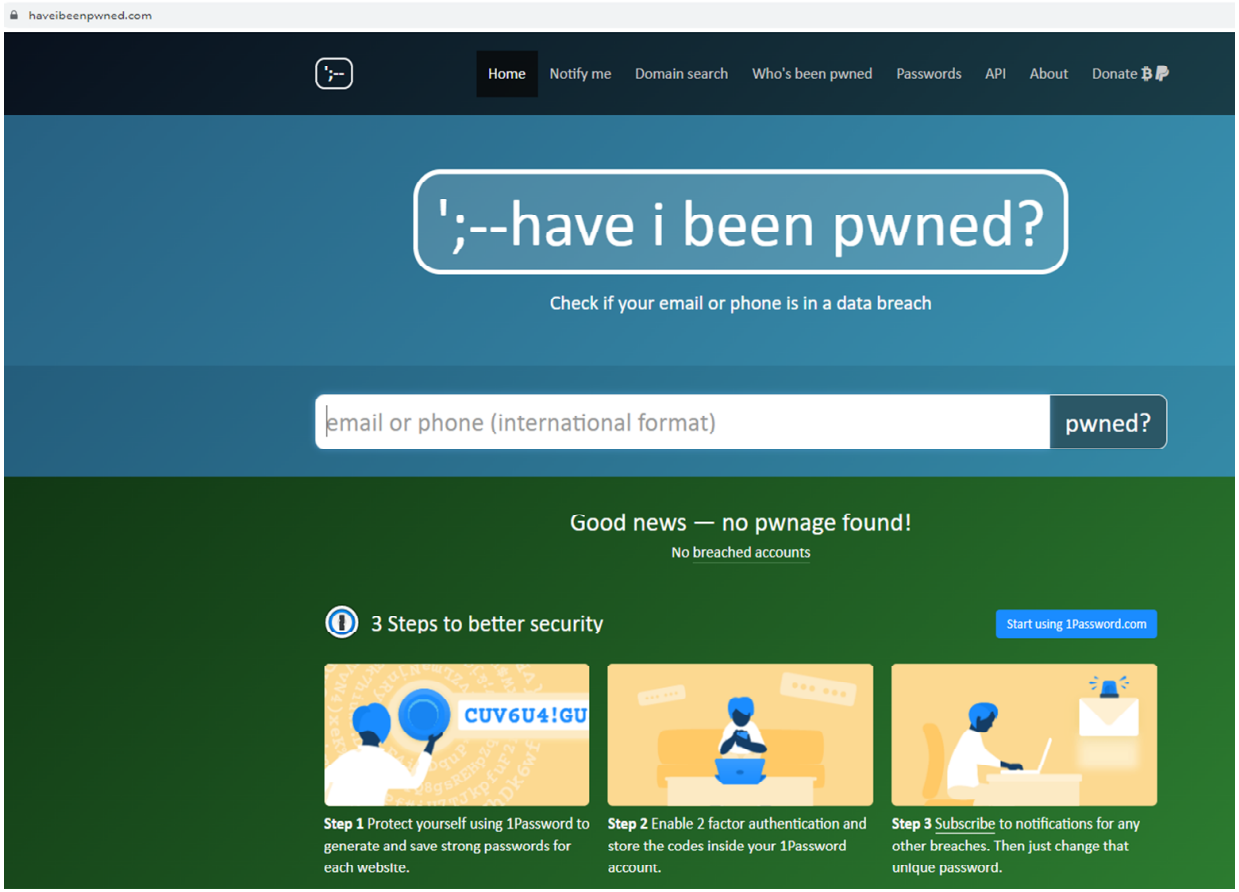
USE THIS WEBSITE

Website for valid bank routing numbers: https://bank.codes/us-routing-number/bank/



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HAS MY EMAIL BEEN HACKED?



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ENTER THE REAL PORTAL

- Do not enter Bank's website through a link in an email
- Always type the link manually
- Spoofed portals will look the same but may use pop-up windows, poor grammar, pay attention to address bar



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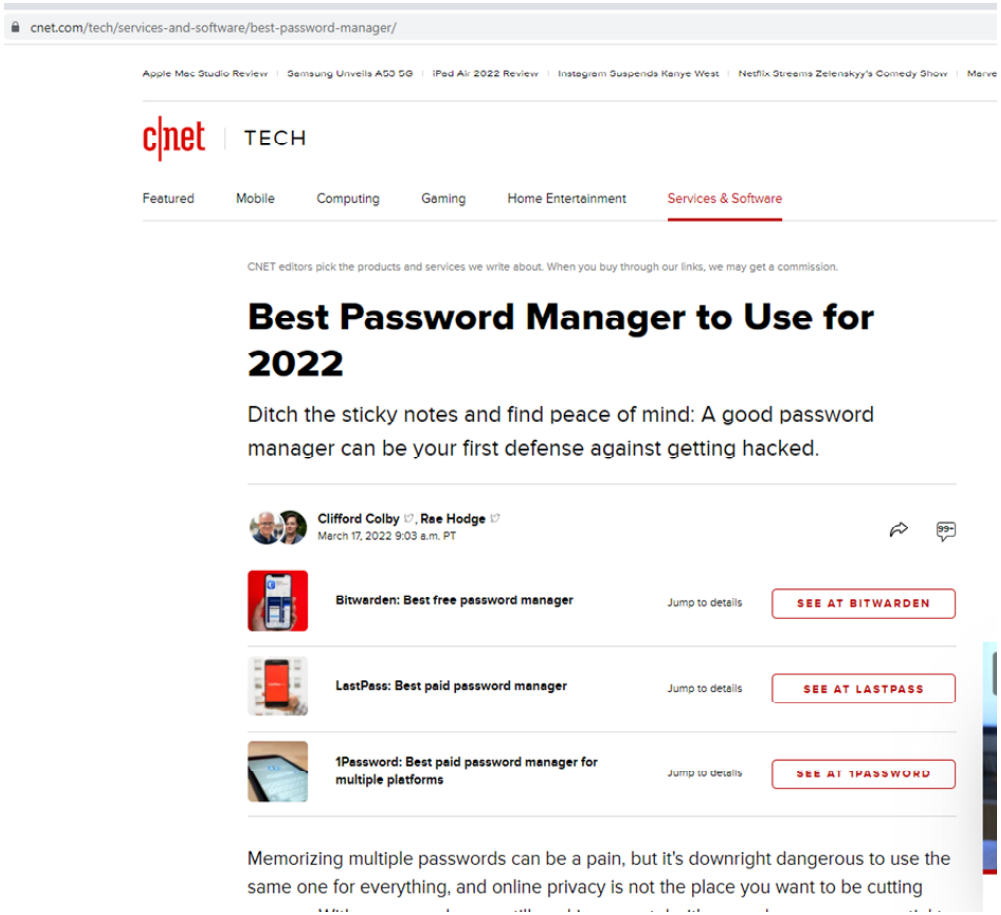
USE DMARC TO VALIDATE EMAIL

- To block *some* forged emails, read this post from Microsoft 365 Security

https://docs.microsoft.com/en-us/microsoft-365/security/office-365-security/anti-spoofing-protection?view=o365-worldwide

- Add an SPF, DKIM, and DMARC DNS records to your company domain name to help validate some spoofed emails
  - Speak your IT dept.
- No silver bullet
- Staff diligence most important

USE A PASSWORD MANAGER



GET IT IN WRITING & PROTECT YOURSELF

Develop a written, easy-to-understand wire transfer policy

Have the Buyer sign an Acknowledgement indicating that Buyer:

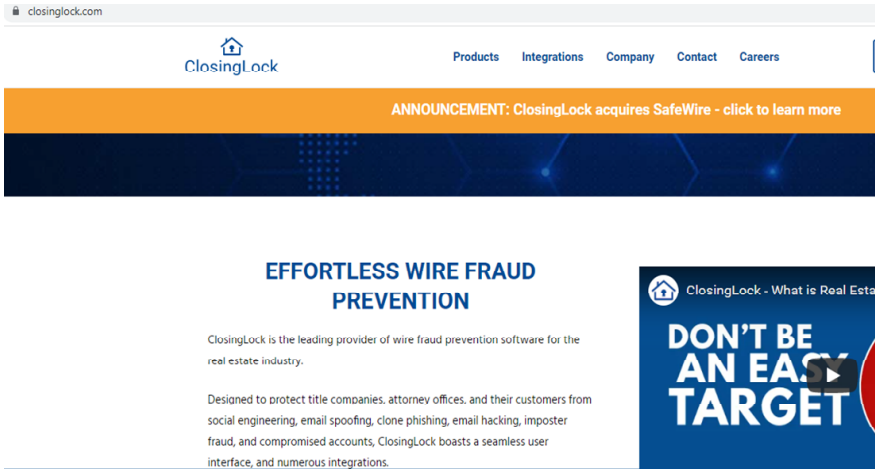
- has read,
- understands, and
- agrees

to the terms of your written wire transfer policy.

THE ROLE OF INSURANCE

- Errors & omissions
  - May or may not cover
- Cyber
  - Geared towards ransomware, data breaches
- Crime
  - Computer crime, Funds Transfer Frauds
  - Case specific
- Social Engineering Endorsements

3rd PARTY SOFTWARE





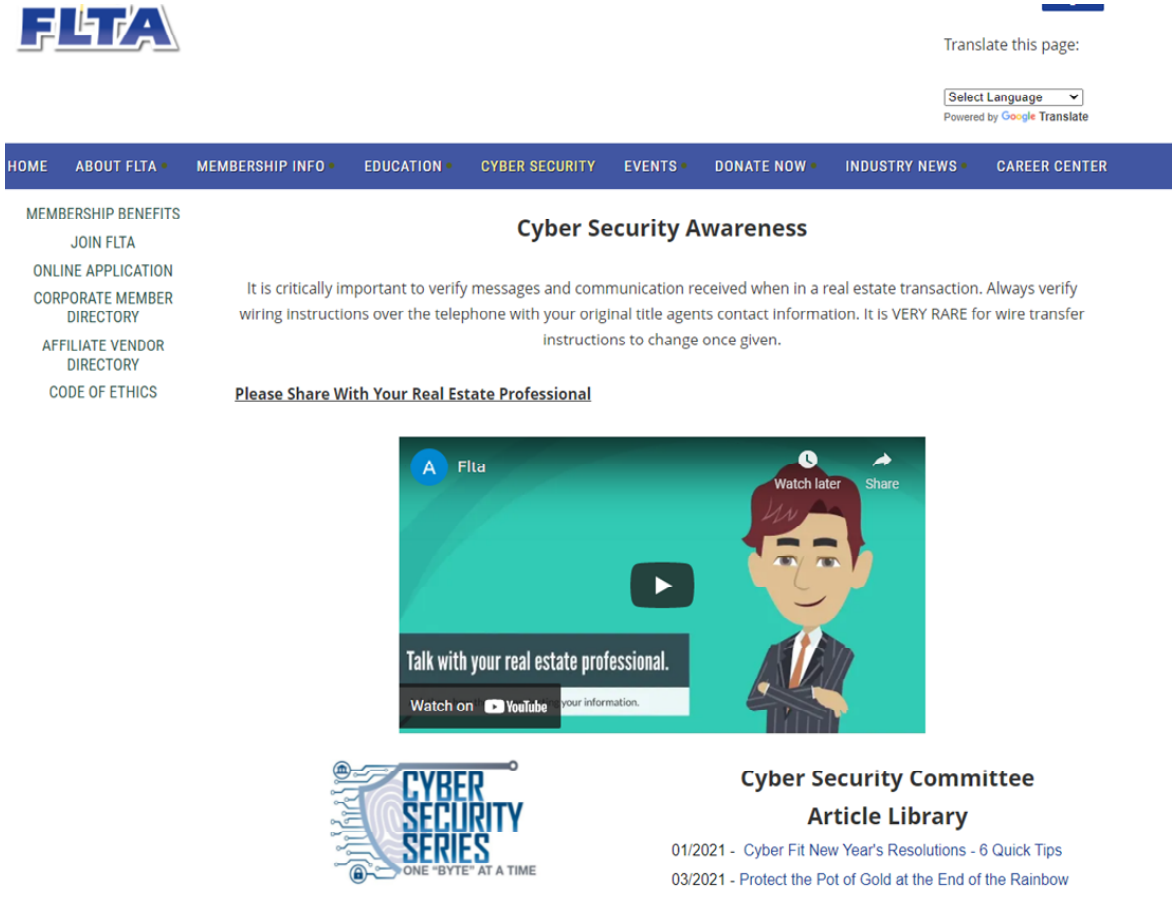
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WHEN IN DOUBT, SEND A CHECK

If there is <u>any</u> reason to question the bona fides of the payoff statement or the transaction seems suspicious in any way, do not wire the payoff funds. Instead, overnight a check.



FLTA AS A RESOURCE



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FOLLOW THE FUND'S WEBSITE



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Lender Payoff Scam Alert

FRAUD DETECTION

Cybercriminals are using mortgage payoff statements to defraud the industry. The documents look authentic and require a careful review of all information. The chart below includes a list of items to look out for. It does not include every scheme. Scammers are introducing new tactics daily. If you discover anything suspicious in your payoffs that is not listed here, please contact us.

Reasons to question/analyze the payoff's authenticity	Tips for ordering/verifying payoffs
The payoff was ordered based on information from a document that could have been compromised or may be inaccurate.	Use copy of the seller's/borrower's last mortgage statement to order the payoff: providing specific details of lender's information and account number. **Tip:** Provide customer with a paid stamped envelope to mail you an original.
The bank/lender's contact information was not verified prior to ordering the final payoff. **Example:** The payoff was directly ordered from Second National Bank; a fake lender the fraudster created.	If an original statement or trusted document isn't provided to order the payoff, verify the bank/lender contact information prior to ordering. **Tip:** Use the correct information for that lender's payoff department saved in your software program.
The borrower's/seller's payoff information looks suspicious compared to the title commitment: • Payoff amount is higher than the original loan amount; • Lender is different and cannot be verified.	Compare the borrower's/seller's payoff statement information with the title commitment. **Tips:** • If the lender is different, check PayoffAssist.com to confirm current lender information is accurate. • Verify a line of credit has been closed. • Verify the secured property is on the statement.
The payoff was ordered by another party, (seller, borrower, real estate agent etc.).	Confirm the payoff statement was sent from the lender it was ordered from. **Tip:** Compare it with the original order that contains verified contact information.
Sender's email/fax number was not verified.	Verify the sender's email/fax number is correct upon receipt of the statement. **Tips:** • Carefully inspect all information to ensure authenticity. • Hover over email addresses and links. • Recheck sender's fax number.
The timestamp on the fax looks suspicious and may be from a time zone in another country.	The timestamp on the fax is from a U.S. time zone. **Tip:** If unsure of the time zone, verify it using a search engine.
The statement indicates funds can only be wired *or* it indicates funds can be wired and mailed; however, there is no mailing address provided.	Confirm the payoff statement includes complete instructions on where to wire and mail* funds. **Tip:** Compare the information with the contact information saved in your software program. * In some cases a mailing address is included and the scammers are hoping you don't use it.





ALTA Rapid Response Plan for Wire Fraud Incidents

https://www.alta.org/file.cfm?name=ALTA-Rapid-Response-Plan-for-Wire-Fraud-Incidents

Time is of the essence – every second and minute counts.
Organize your team and make a plan in advance.
Be ready to act simultaneously and accomplish all of these steps as quickly as possible.

Step 1: Alert company management and your internal wire fraud response team.

Contact your team according to a pre-arranged plan (group email; group text):

- Owner / Manager
- Accounting / Finance / Treasurer
- IT / IT Security
- Legal Counsel
- Underwriter(s)

Step 2: Report Fraudulent Wire Transfers to the Sending and Receiving Banks.

- Contact the sending bank's fraud department and request that a recall of the wire be sent to the receiving bank because of fraud. Provide the details for the wire. Also request a recall or reversal and a Hold Harmless Letter or Letter of Indemnity.
- Ask the sending bank to initiate the FBI's Financial Fraud Kill Chain.
- Also call the receiving bank's fraud department to notify them that you have requested a recall of the wire because of fraud. Provide the details for the wire and request that the account be frozen.
- If a client or consumer was a victim and your bank/accounts were not directly involved, your client or customer will need to contact the bank themselves but you may have helpful information to share, too. Coordinate quickly!

Step 3: Inform the parties to the transaction (buyer, seller, real estate agents, broker, attorneys, underwriter, notary, etc.) using known, trusted, phone numbers for verbal verification.

If you're unsure about what to say, here's a sample: "There appears to have been [attempted] wire fraud associated with this transaction. We recommend that you review your email security and update passwords and take any other appropriate security measures immediately. For the remainder of this transaction, all communication will occur using known, trusted, telephone numbers."

Step 4: File a complaint with the FBI's Internet Crime Complaint Center (IC3).

Need help to get started? Visit www.alta.org/ic3how to see a two-minute how-to video.
Ready to go? Visit www.alta.org/ic3 and provide the following information:

- Victim's name, address, telephone, and email
- Financial transaction information (e.g., account information, transaction date and amount, who received the money)
- Subject's name, address, telephone, email, website, and IP address
- Specific details on how you were victimized
- For Business Email Compromise (BEC) events, copy email header(s). Learn How at https://mxtoolbox.com/Public/Content/EmailHeaders/
- Any other relevant information that is necessary to support the claimant

Step 5: Report Fraudulent Wire Transfers and Attempts to Law Enforcement in the jurisdiction where the crime has occurred.

- Local Police/Sheriff: https://www.policeone.com/law-enforcement-directory/
- FBI Field Office: https://www.fbi.gov/contact-us/field-offices
  Ask your Field Office to initiate the FBI's Financial Fraud Kill Chain.
- Secret Service: https://www.secretservice.gov/contact/field-offices/

Step 6: Call the sending bank again to confirm that the recall request has been processed.

Step 7: Document your response using a Response Worksheet.

- Customize this ALTA Rapid Response Plan for Wire Fraud Incidents
- Customize a Response Worksheet (available in Excel or PDF)
- Assign each step to an appropriate person/entity
- Track progress through to completion or resolution
- Retain the Response Worksheet for future reference/update

Step 8: Consider contacting your insurance carrier(s) and outside legal counsel.

Step 9: Review your Incident Response Plan to determine if you need to update passwords, secure hardware, and review email logs to determine how and when email accounts were accessed.

Step 10: If funds were wired out of the U.S., hire an attorney in that country to help recover funds.

NALA | THE PARALEGAL ASSOCIATION

7666 E. 61st, Suite 315, Tulsa, OK 74133
Phone: 918-587-6828 ♦ Fax: 918-582-6772
www.nala.org ♦ cle@nala.org

CERTIFICATE OF ATTENDANCE

Certified Paralegals are required to submit evidence of 50 hours of continuing legal education hours to renew the CP credential every 5 years. Of the 50 hours, 5 hours must be in legal ethics, and no more than 10 hours may be recorded in non-substantive areas. If attending a non-NALA sponsored educational event, this certificate should be completed and submitted with relevant documentation for the event. Please be sure to obtain the required signatures for verification of attendance. The requirements to maintain the CP credential are available from NALA's web site at https://www.nala.org/certification/certtest2view.

PLEASE COMPLETE THE SPACES BELOW AND ATTACH A PROGRAM

Session Hours	Session Topics (Description and Speakers)	Validation of Attendance
1	Avoiding Mortgage Payoff Fraud	MR

Name of CP (Please Print)

149113
NALA Account Number (On Mailing Label)

Signature of CP

Attorneys' Title Fund Services, LLC
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Address

Michael Rothman
Authorized Signature of Sponsor Representative

Date of Educational Event:

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For Office Use Only	
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