## Does the Credit Repair Organizations Act Apply to Rescore Express?

Advantage Credit, Inc. (Advantage Credit) is a Reseller for the national Credit Bureaus: TransUnion, Equifax and Experian. We are not a Credit Repair company, nor do we provide Credit Repair services. In fact, Advantage Credit does not sell data or services directly to consumers; our clients are businesses in financial services, with an emphasis on the mortgage industry. In essence, Advantage Credit is a middleman between the national Credit Bureaus and our clients, reselling data and services from the Credit Bureaus to the businesses who use this information to make lending decisions.

One of the Bureau services we offer to our clients is Rescore Express (Rescore). Rescore updates our clients' borrower's tradeline information at the Bureau level in a matter of days. This is in contrast to otherwise waiting 4+ weeks for recent payments to display on the borrower's account history, after creditors get around to reporting the latest payment histories to the Bureaus. The speed of these payment updates benefits our end users, who otherwise might miss a commission by having to turn down a loan application or miss out on a loan opportunity because the terms were not favorable enough to entice the consumer.

## The Rescore service comes with firm restrictions that must be followed by the client: borrowers cannot pay for nor be charged for Rescore services.

Clients who whose borrowers pay for Rescore services violate the Credit Repair Organizations Act (CROA), 15 USC Chapter 41, Subchapter II-A: Credit Repair Organizations; From Title 15—Commerce and Trade; Chapter 41—Consumer Credit Protection; §1679b. Prohibited practices (b). These clients will have their access shut off while the borrower's charges are reversed and billed directly to the client. Repeat offenders risk having their membership with Advantage Credit terminated.

