

RED FLAG D1	Personal identifying information provided by the customer is inconsistent when compared against external information sources used by the dealership. For example, the address on the credit application does not match any address in the consumer report.
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Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)
(Complete if "yes" box is checked.)

1. Before opening the account, obtain customers signed credit application.
2. Before opening the account, obtain a consumer report.
 - A. Review the address and other information on the credit application for consistency with information provided in the consumer report.
3. Review the consumer report for warnings, notifications, or alerts concerning a mismatch between data supplied by the customer and data available to the consumer reporting agency.
 - 1.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.
2. Ask customer to explain the mismatch.

RED FLAG D2	Personal identifying information provided by the customer is not consistent with other personal identifying information provided by the consumer. For example, the credit application reflects that the consumer owns his home but the residence address reflects an apartment number.
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Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)
(Complete if "yes" box is checked.)

1. Before opening the account, obtain customers signed credit application.
 - A. Review the address and other information on the credit application for consistency with other information provided in the credit application and other written information submitted by the customer.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.
2. Ask customer to explain the mismatch.

RED FLAG D3	Personal identifying information provided by the customer is associated with known or suspected fraudulent activity as indicated in alerts or warnings received by the creditor from a consumer reporting agency
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Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)
(Complete if "yes" box is checked.)

1. Before opening the account, obtain customers signed credit application.
2. Before opening an account, obtain a consumer report
3. Review the consumer report for warnings, notifications, or alerts concerning known or suspected fraudulent activity.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.

RED FLAG D4	Personal identifying information provided is of the type commonly associated with fraudulent activity as indicated in alerts or warnings received by the dealership from a credit reporting agency. For example , (a) the address on an application is fictitious , a mail drop, or a prison; or (b) the phone number is invalid, or associated with a pager or answering machine.
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Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)

(Complete if "yes" box is checked.)

1. Before opening the account, obtain customers signed credit application.
2. Before opening an account, obtain a consumer report
 - A. Review the address and other information on the credit application for consistency with information provided in the consumer report.
3. Review the consumer report for warnings, notifications, or alerts concerning known or suspected fraudulent activity, such as warnings of suspect types of addresses.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.

**RED FLAG
D5**

The dealership is notified by a customer, or financial institution with which dealership does business, a victim of identity theft, a law enforcement authority, or any other person that a potential identity thief may attempt to open an account with dealership using someone else's personal identifying information.

Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)
(Complete if "yes" box is checked.)

1. Make all F&I and sales personnel aware of notifications of potential identity theft attempts.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.
2. Contact the individual who notified the dealership of the potential identity theft attempt to determine whether an attempted identity theft is occurring.
3. Consult with Program Coordinator/Compliance Officer to determine whether law enforcement should be contacted.

RED FLAG D6	A customer seeks to execute a vehicle credit sale or lease and take delivery of the vehicle off-site at a location other than the dealership facility.
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Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)
(Complete if "yes" box is checked.)

1. Open the account with the assumption that the execution of documents and delivery of the vehicle will occur on-site, at the dealership's facility. Be alert to any effort by the customer to request or steer the transaction toward an off-site delivery.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.
2. Advise customers inquiring about off-site delivery that all paperwork, credit report, and identification procedures used by the dealership for both buyers and co-buyers apply to both on-site and off-site deliveries. Do not open the account if customer directly or indirectly seeks to avoid compliance with all identification requirements.

RED FLAG D7	A co-buyer or co-lessee is included in the vehicle credit sale or lease but is not present at the dealership facility to sign the contract or lease.
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Applies to: The opening of all covered accounts

Included in Dealership Program as a Relevant Red Flag

YES

NO

Detection Method(s)
(Complete if "yes" box is checked.)

1. Open the account with the assumption that the execution of all documents and delivery of the vehicle will occur on-site, at the dealership's facility. Be alert to any transaction where the co-buyer or co-lessee is not present or any effort by the customer to request or steer the transaction toward having the co-buyer or co-lessee sign documents off-site.

Response(s)

1. Follow the general response procedures in section 12 of the ITPP.
2. Advise customers that all paperwork, credit report, and identification procedures used by the dealership for both buyers and co-buyers apply to all transactions. Do not open the account if customer directly or indirectly seeks to avoid compliance with all identification requirements.