Exhibit 1

CID Document Submission Standards

This describes the technical requirements for producing paper collections, email and electronic document/ native file collections to the Consumer Finance Protection Bureau's Office of Enforcement. All documents shall be produced in complete form, in color, unredacted unless privileged, and shall not be edited, cut, or expunged. The Bureau encourages all documents be submitted in electronic form. These standards must be followed for all documents you submit in response to the CID.

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A. Transmittal Instructions

1. A cover letter should be included with each production. The following information should be included in the letter:
    a. Name of the party making the production and the date of the CID to which the submission is responsive.
    b. List of each piece of media (hard drive, thumb drive, DVD or CD) included in the production (refer to the media by the unique number assigned to it, *see* ¶ 4)
    c. List of custodians, identifying:
        i. The Bates range (and any gaps therein) for each custodian,
        ii. Total number of images for each custodian, and
        iii. Total number of native files for each custodian
    d. List of fields in the order in which they are listed in the metadata load file.
    e. Time zone in which emails were standardized during conversion (email collections only).
    f. The specification(s) or portions thereof of the CID to which the submission is responsive.
2. Documents created or stored electronically MUST be produced in their original electronic format, not printed to paper or PDF.
3. Data may be produced on CD, DVD, USB thumb drive, or hard drive; use the media requiring the least number of deliverables.
    a. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:
    "MAGNETIC MEDIA – DO NOT X-RAY"
    "MAY BE OPENED FOR POSTAL INSPECTION"
    b. CD-R CD-ROMs should be formatted to ISO 9660 specifications;
    c. DVD-ROM for Windows-compatible personal computers are acceptable;
    d. USB 2.0 thumb drives for Windows-compatible personal computers are acceptable;
    e. USB 3.0 or USB 3.0/eSATA external hard disk drives, formatted in a Microsoft Windows-compatible file system (FAT32 or NTFS), uncompressed data are acceptable.
4. Label all media with the following:
    a. Case number
    b. Production date
    c. Bates range
    d. Disk number (1 of X), if applicable
    e. Name of producing party
    f. A unique production number identifying each production
5. All productions must be produced free of computer viruses. Infected productions may affect the timing of your compliance with this demand.
6. All produced media must be encrypted using Microsoft Bitlocker. No other third party encryption utilities are accepted without prior approval.
    a. Data deliveries should be encrypted at the disc level.

b. Decryption keys should be provided separately from the data delivery via email or phone.

7. Passwords for documents, files, compressed archives and encrypted media should be provided separately either via email or in a separate cover letter from the data.

B. Delivery Formats

1. General ESI Standards

Before submitting any Electronically Stored Information ("ESI") or any other documents submitted in electronic form that do not conform completely to the listed specifications, you must confirm with the Bureau that the proposed formats and media types that contain such ESI will be acceptable. You are encouraged to discuss your specific form of submission, and any related questions with the Bureau as soon as is practicable.

All productions must follow the specifications outlined below:

- De-duplication
  De-duplication of documents should be applied across custodians (global); each custodian should be identified in the Custodian field in the metadata load file separated by semi-colon. The first name in the Custodian list should represent the original holder of the document.

- Bates Numbering Documents
  The Bates number must be a unique, sequential, consistently formatted identifier, i.e., an alpha prefix unique to each producing party along with a fixed length number, i.e., ABC0000001. This format must remain consistent across all productions. There should be no space in between the prefix and the number. The number of digits in the numeric portion of the format should not change in subsequent productions, nor should hyphens or other separators be added or deleted.

- Document Retention / Preservation of Metadata
  The recipient of this CID should use reasonable measures to maintain the original native source documents in a manner so as to preserve the metadata associated with these electronic materials as it existed at the time of the original creation.

2. **Native and Image Production**
In general, and subject to the specific instructions below: (1) produce electronic documents in their complete native/original format along with corresponding bates-labeled TIF images; (2) scan and process all paper documents into TIF images, OCR the images, and apply bates numbers to each page of the image; (3) produce fully searchable text for every produced document; and (4) produce metadata for every produced document in a data file that conforms to the specific instructions below.

   a. **Metadata File**
   All produced documents, regardless of their original file format, must be produced with the below-described metadata fields in a data file (.DAT).

      i. The first line of the .DAT file must be a header row identifying the field names.
      ii. The .DAT file must use the following default delimiters:

Comma	¶	ASCII character (020)
Quote	þ	ASCII character (254)
Newline	®	ASCII character (174)

      iii. Date fields should be provided in the format: mm/dd/yyyy
      iv. All attachments should sequentially follow the parent document/email.
      v. All documents shall be produced in both their native/original form and as a corresponding bates-labeled TIF image; provide the link to the original/native document in the NATIVELINK field.
      vi. Produce extracted metadata for each document in the form of a .DAT file, and include these fields:

Field Name	Description
BATES_BEGIN	First Bates number of native file document/email
BATES_END	Last Bates number of native file document/email **The BATES_END field should be populated for single page documents/emails
ATTACH_BEGIN	First Bates number of attachment range
ATTACH_END	Last Bates number of attachment range
GROUP_ID	A unique family identifier used to link documents/emails and attachments
PRIV	Indicate "YES" if document has a Privilege claim
REQ_NUM	Indicate Interrogatory number(s) document is responsive to. (ROG ##) If multiple, separate by semi-colon

DOC_REQ	Indicate Document Request document is responsive to. (DR ##) If multiple, separate by semi-colon
RECORDTYPE	Email: Populate field as "E-Mail" Attachment: Populate field as "Attachment" Email Attachment: Populate field as "Attachment (E-mail)" Loose Native: Populate field as "E-Document" Scanned Paper: Populate field as "Paper"
CUSTODIAN	Individual(s) or department(s) from which the record originated **semi-colon should be used to separate multiple entries
FROM	Email: Sender of email Non-email: (empty) **semi-colon should be used to separate multiple entries
TO	Email: Recipient(s) of email **semi-colon should be used to separate multiple entries
CC	Carbon copy recipient(s) **semi-colon should be used to separate multiple entries
BCC	Blind carbon copy recipient(s) **semi-colon should be used to separate multiple entries
SUBJECT	Subject line of the email
DATE_SENT	Email: Date the email was sent
TIME_SENT	Email: Time the email was sent **This data must be a separate field and cannot be combined with the DATE_SENT field
DATE_RECVD	Email: Date the email was received
TIME_RECVD	Email: Time the email was received
NATIVELINK	Hyperlink to the email or native file document **The linked file must be named per the BATES_BEGIN number
FILE_EXT	The file extension representing the email or native file document
AUTHOR	Email: (empty) Non-email: Author of the document
DATE_CREATED	The date the electronic file was created as reported by the OS
TIME_CREATED	The time the electronic file was created as reported by the OS
DATE_MOD	Date an electronic file was last modified as reported by the OS
TIME_MOD	Time an electronic file was last modified as reported by the OS
PRINT_DATE	Date the document was last printed
PRINT_TIME	Time the document was last printed
FILE_SIZE	Size of native file document/email in KB

PGCOUNT	Number of pages in native file document/email *if TIFs are included.
SOURCE	Email: Path to email container and email container name Non-email: Original path to source archive folder or files
FOLDERPATH	Email: Folder path within email container Non-email: Folder path to file as reported by OS
FILENAME	Email: Filename of loose email or subject of non-loose email Non-email: original file name
MD5HASH	The 32 digit value representing each unique document
TEXTPATH	Contains path to OCR/Extracted text file that is titled after the document BATES_BEGIN

b. Document Text

Searchable text of the entire document must be provided for every record, at the document level.

i. Extracted text must be provided for all documents that originated in electronic format.

Note: Any document in which text cannot be extracted must be OCR'd.

ii. For documents redacted on the basis of any privilege, provide the OCR text for unredacted/unprivileged portions.

iii. The text should be delivered in the following method:

As multi-page ASCII text files with the files named the same as the Bates_Begin field. Text files can be placed in a separate folder or included with the .TIF files. The number of files per folder should be limited to 500 files.

c. Linked Native Files

Copies of original email and native file documents/attachments must be included for all electronic productions.

i. Native file documents must be named per the BATES_BEGIN number (the original file name should be preserved and produced in the FILENAME metadata field).

ii. The full path of the native file must be provided in the .DAT file in the NATIVELINK field.

iii. The number of native files per folder should not exceed 500 files.

iv. If the native file is withheld for privilege, a copy of the redacted text file should be the replacement native.

d. Images

i. Images should be single-page, Group IV TIF files, scanned at 300 dpi.

ii. File names should be titled per endorsed bates number.

iii. Color should be preserved when necessary to interpret the document.

iv. Bates numbers should be endorsed on the lower right corner of all images.

v. For documents partially redacted on the basis of any privilege, ensure the redaction box is clearly labeled "REDACTED"

vi. The number of TIF files per folder should not exceed 500 files.

e. Image Cross Reference File

i. The image cross-reference file is needed to link the images to the database. It is a comma-delimited file consisting of seven fields per line. There must be a line in the cross-reference file for every image in the database.

Field Title	Description
ImageID	The unique designation use to identify an image.
	Note**:** *This imageID key* ***must*** *be a unique and fixed length number. This number will be used in the.DAT file as the ImageID field that links the database to the images. The format of this image key must be consistent across all productions. We recommend that the format be an eight digit number to allow for the possible increase in the size of a production.*
VolumeLabel	Optional
ImageFilePath	The full path to the image file.
DocumentBreak	The letter "Y" denotes the first page of a document. If this field is blank, then the page is not the first page of a document.
FolderBreak	Leave empty
BoxBreak	Leave empty
PageCount	Optional
	**This file should not contain a header row.*

SAMPLE:
IMG0000001,OPTIONALVOLUMENAME,E:\001\IMG0000001.TIF,Y,,,3
IMG0000002,OPTIONALVOLUMENAME,E:\001\IMG0000002.TIF,,,,
IMG0000003,OPTIONALVOLUMENAME,E:\001\IMG0000003.TIF,,,,
IMG0000004,OPTIONALVOLUMENAME,E:\001\IMG0000003.TIF,Y,,,1
IMG0000005,OPTIONALVOLUMENAME,E:\001\IMG0000003.TIF,Y,,,2
IMG0000006,OPTIONALVOLUMENAME,E:\001\IMG0000003.TIF,,,,

3. PDF File Production

When approved, Adobe PDF files may be produced in lieu of TIF images for scanned paper productions (metadata must also be produced in accordance with the instructions above):

a. PDF files should be produced in separate folders named by the Custodian.
b. All PDFs must be unitized at the document level, i.e. each PDF should represent a discrete document; a single PDF cannot contain multiple documents.
c. All attachments should sequentially follow the parent document.
d. All PDF files must contain embedded text that includes all discernible words within the document, not selected text only. This requires all layers of the PDF to be flattened first.
e. If PDF files are Bates endorsed, the PDF files must be named by the Bates range.
f. The metadata load file listed in 2.a. should be included.

4. **Transactional Data**
If transactional data must be produced, further discussion must be had to ensure the intended export is properly composed. If available, a data dictionary should accompany the production, if unavailable; a description of fields should accompany transactional data productions. The following formats are acceptable:

- SQL Backup file
- MS Access
- XML
- CSV
- TSV
- Excel (with prior approval)

5. **Audio/Video/Electronic Phone Records**
If audio, video, or telephone records must be produced, the call information (metadata) related to each audio recording must be provided. The metadata file must be produced in one of the following formats, CSV, TSV, or XML. The metadata must include, if available, the following fields:

FIELDNAME	DESCRIPTION
AGENTNAME:	Name of agent/employee
AGENTID:	Unique identifier of agent/employee
GROUP:	Name for a collection of agents
SUPERVISOR:	Name of the Agent's supervisor
SITE:	Location of call facility
DNIS:	Dialed Number Identification Service, identifies the number that was originally called
EXTENSION:	Extension where call was routed
CALLDIRECTION:	Identifies whether the call was inbound, outbound, or internal
CALLTYPE:	Purpose of the call
CUSTOMERID:	Customer's identification number
CUSTOMERNAME:	Name of person called
CUSTOMERCITY:	Customer's city of residence
CUSTOMERSTATE:	Customer's state of residence
DURATION:	Duration of Call
DATE:	Date of call
START_TIME:	Start time of call
END_TIME:	End time of call
FILENAME:	Filename of audio file

Supported Date Formats	Example
Month, Day, yyyy hh:mm:ss	January 25, 1996 10:45:15
hh:mm:ss Mon Day, yyyy	10:45:15 Jan 25, 1996
mm/dd/yyyy hh:mm:ss am/pm	01/25/1996 10:45:15 am

6. **Hard Copy Submission**

For any documents submitted in hard copy form:

a. Original documents shall not be submitted;
b. Hard copy submissions shall be organized first by request number and second by custodian. Other than organizing by request number, such documents shall be produced in the order in which they appear in your files, without being shuffled or otherwise rearranged;
c. If, in their original condition, documents were stapled, clipped, or otherwise fastened together or maintained in file folders, binders, cover, or containers, they shall be produced in such form, and any documents that must be removed from their original folders, binders, covers, or containers in order to be produced shall be identified in a manner so as clearly to specify the folder, binder, cover, or container from which such documents came;
d. Such documents shall include all covering letters and memoranda, transmittal slips, appendices, tables, or other attachments; and
e. Such documents shall have unique, sequential bates numbers clearly marked on each page.

C. Production of Partially Privileged Documents

If a portion of any material called for by this CID is withheld based on a claim of privilege, those portions may be redacted from the responsive material as long as the following conditions are met.

a. If originally stored as native electronic files, the image(s) of the unredacted portions are submitted in a way that preserves the same appearance as the original without the redacted material (i.e., in a way that depicts the size and location of the redactions). The OCR text will be produced from the redacted image(s). Any redacted, privileged material should be clearly labeled to show the redactions on the tiff image(s). Any metadata not being withheld for privilege should be produced in the DAT file; any content (e.g., PowerPoint speaker notes, Word comments, Excel hidden rows, sheets or columns) contained within the native and not being withheld for privilege should be tiffed and included in the production.

b. If originally in hard copy form, the unredacted portions are submitted in a way that depicts the size and location of the redactions; for example, if all of the content on a particular page is privileged, a blank, sequentially numbered page should be included in the production where the responsive material, had it not been privileged, would have been located.