



ETHICS COMPLAINT PROCEDURES AND INSTRUCTIONS

Who can file.

Any person or entity engaged in or servicing the leasing industry that could have applied for membership as a broker, funder or associate in the NAELB but is not a member of the NAELB may not file an ethics complaint against a member of the NAELB whatsoever. Any lessee, vendor or other interested party dealing with a member of the NAELB that is not a participant in the leasing industry and not a member of the NAELB may file a complaint against a NAELB member at any time.

How to file.

The complaining party must submit a letter with an original signature on the company's letterhead to the office of NAELB Legal Counsel. This letter should outline the events that occurred, detail the alleged violation, and be accompanied by all supporting documentation. It is essential the letter contain the following sentence, **“There is no pending litigation between the parties. I agree to notify the NAELB if I become engaged in litigation about this matter and understand the NAELB will suspend the investigation pending the conclusion of the litigation.”**

What happens next?

Upon receipt of the properly filed complaint, NAELB Legal Counsel will contact all parties and attempt to facilitate a reasonable resolution. If unsuccessful, the matter will be sent, in redacted (names of parties removed) format, to the NAELB Ethics Committee for their comments and suggestions. Those suggestions are then related to the parties in a further attempt to resolve the issue.

If the matter still remains unresolved, the complaint, together with all related documents and correspondence, will be sent to the full NAELB Board of Directors with the names of the parties disclosed. The Board has total discretion to take whatever action it deems appropriate. This action can range from taking no action to expulsion from the Association.

The NAELB is a non-profit association and not a court of law. The NAELB cannot issue an enforceable legal order, but can only take action pertaining to a company's membership status in the NAELB.



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1. Please send a WRITTEN narrative describing your complaint, including background information and *as much detail as possible* (i.e. names, dates, specific actions, etc.)
2. It is very important for you to include copies of ALL relevant documentation. Suggested documentation includes (not all of the following may apply in every case):
 - Copies of all correspondence (letters AND emails) between the parties
 - Copies of ALL documents between the parties, which might include:
 - Proposal to finance and/or approval notifications
 - Lease Documents (including all addendums, cover letters, etc)
 - Invoices
 - Copies of checks
 - Vendor's invoices and/or quotes
 - Lease application
 - Copy of Broker Agreement / Discount Agreement (i.e. if dispute involved broker and funder)
3. Please note that if you can help to substantiate your complaint by providing documentation to back-up your claims, then it will be easier for the NAELB to make appropriate decisions.
4. Please indicate in your letter what action you would consider a fair method of resolving the dispute.
5. The end of your letter MUST include the following statement:

I further state that there is no pending litigation between the parties. I agree to notify NAELB if I become engaged in litigation about this matter and understand that NAELB will suspend the investigation pending the conclusion of litigation.
6. Your complaint should be sent to:

Joseph G. Bonanno, Esq., CLP
NAELB Legal Counsel
15 New England Executive Park
Burlington, MA 01803