

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#2 –FIDUCIARY & CORPORATE MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
LAWS, RULES AND REGULATION		
<u>12 CFR 9.18</u> <i>Collective Investment Funds</i>	✓	
Internal Revenue Code		
<u>26 USC Section 584</u> <i>Common Trust Funds</i>	✓	
<u>Texas Finance Code</u>		
Texas Trust Company Act		
<u>§181.107</u> - <i>Statements of Condition and Income</i>	✓	
<u>§182.002</u> - <i>Certificate of Formation of State Trust Company</i>	✓	
<u>§182.101</u> - <i>Amendment or Restatement of State Trust Company Certificate of Formation</i>	✓	
<u>§183.102</u> - <i>Bylaws</i>	✓	
<u>§183.103</u> - <i>Board of Directors, Managers or Managing Participants</i>	✓	
<u>§183.105</u> - <i>Required Quarterly Board Meetings</i>	✓	
<u>§183.106</u> - <i>Officers</i>	✓	
<u>§183.109</u> - <i>Transactions with Management and Affiliates</i>	✓	
<u>§183.110</u> – <i>Fiduciary Responsibility</i>	✓	
<u>Texas Business Organization Code</u>		
<u>§6.002</u> <i>Alternative Forms of Meetings</i>	✓	
<u>Chapter 8</u> - <i>Indemnification and Insurance</i>	✓	
<u>§21.052</u> - <i>Procedures to Adopt Amendment to Certificate of Formation</i>	✓	
<u>§21.057</u> – <i>Bylaws</i>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#2 –FIDUCIARY & CORPORATE MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p><u>Chapter 21, Subchapter E</u> - Shareholder Rights and Restrictions: Sections 21.201 - 21.226</p> <p>Chapter 21, Subchapter H - Shareholders’ Meetings; Notice to Shareholders; Voting; and Quorum</p> <p><u>§21.351</u> Annual Meeting</p> <p><u>§21.358</u> - Quorum</p> <p>Texas Administrative Code</p> <p><u>7 TAC §3.22</u> - Sale or Lease Agreements with an Officer, Director, or Principal Shareholder of the Bank or of an Affiliate of the Banks</p> <p>7 TAC <u>§17.3</u> Sale or Lease Agreements with an Officer, Director, Principal Shareholder, or Affiliate</p> <p>7 TAC <u>§17.4</u> Bonding Requirements</p> <p>7 TAC <u>§21.9</u> Corporate Filings</p> <p><u>Texas Property Code</u></p> <p>FDIC Laws and Regulations</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p><u>Industry Notice 2022-2</u>: Director, Manager, Managing Participant Affidavit – Oath of Office (3/2022)</p> <p>SM 1001 – Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</p> <p>SM 1002 - Trust Company Rating Systems</p> <p>SM 1009 - Strategic Planning</p> <p>FDIC Issuances</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#2 –FIDUCIARY & CORPORATE MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p><i>FDIC Trust Examination Manual - Statement of Principles of Trust Department Management</i></p> <p>Federal Reserve Issuances</p> <p><i>Press Release - Agencies Issue Guide to Assist Community Banks to Develop and Implement Third-Party Risk Management Practices (5/3/24)</i></p> <p>FFIEC Issuances</p> <p>Comptroller of the Currency Issuances</p>	<p>✓</p>	<p>✓</p>
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED MATERIAL		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
#3—OPERATIONS, INTERNAL CONTROLS, & AUDITING

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p>LAWS, RULES AND REGULATION</p> <p><u>12 CFR 344</u> - Record Keeping and Confirmation Requirements for Securities Transactions</p> <p><u>17 CFR Commodity and Securities Exchanges</u></p> <p style="padding-left: 40px;"><i>Section 240.17Ad-2(b) - Securities Processing</i></p> <p style="padding-left: 40px;"><i>Section 240.17Ad-4(b)(1) - Small Transfer Agent</i></p> <p>Texas Finance Code</p> <p>Texas Trust Company Act</p> <p>Texas Administrative Code</p> <p><u>Texas Property Code</u></p> <p style="padding-left: 40px;"><i>Section 74.101 - Property Report</i></p>	<p>✓</p> <p>✓</p> <p>✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum and Issuances</p> <p style="padding-left: 40px;"><i><u>Industry Notice 2017-11</u> Designation of Representative for Notice of an Abandoned Asset (10/12/2017)</i></p> <p style="padding-left: 40px;"><i>1001 - Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</i></p> <p style="padding-left: 40px;"><i>1002 - Trust Company Rating Systems</i></p> <p>FDIC Issuances</p> <p style="padding-left: 40px;"><i>FDIC Trust Examination Manual - <u>Statement of Principles of Trust Department Management</u></i></p> <p>Federal Reserve Issuances</p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	<p>✓</p>

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#3—OPERATIONS, INTERNAL CONTROLS, & AUDITING

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i>Press Release: Final Rules to Implement the Bank “Broker” Provisions of GLBA (09/24/2007)</i> FFIEC Issuances Comptroller of the Currency Issuances	✓	
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED MATERIAL		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#4–FIDUCIARY & CORPORATE EARNINGS

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p>LAWS, RULES AND REGULATION</p> <p>Internal Revenue Code</p> <p>Securities and Exchange Act</p> <p>Texas Finance Code</p> <p>Texas Trust Company Act (TFC Chapter 181)</p> <p>Texas Property Code</p> <p>Texas Administrative Code</p>		
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p><i>1001 – Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</i></p> <p><i>1002 - Trust Company Rating Systems</i></p> <p><i>SM 1009 - Strategic Planning</i></p> <p>FDIC Issuances</p> <p>Federal Reserve Issuances</p> <p>FFIEC Issuances</p> <p>Comptroller of the Currency Issuances</p>	<p>✓</p> <p>✓</p> <p>✓</p>	
<p>GENERALLY ACCEPTED ACCOUNTING PRINCIPLES</p> <p><i>ASU 2024-03 Income Statement-Reporting Comprehensive Income-Expense Disaggregation Disclosures (Subtopic 220-40): Disaggregation of Income Statement Expenses (11/4/24)</i></p>	<p>✓</p>	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#4–FIDUCIARY & CORPORATE EARNINGS

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i><u>ASU 2018-02</u>-Income Statement-Reporting Comprehensive Income (Topic 220): Reclassification of Certain Tax Effects From Accumulated Other Comprehensive Income (2/14/2018)</i>	✓	
<i>FAS 109 - Accounting for Deferred Tax Assets. <u>See ASC – 740 Income Taxes</u></i>	✓	
OTHER RELATED MATERIAL		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

COMPLIANCE - GENERAL	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
LAWS, RULES AND REGULATION		
<p><u>12 CFR</u></p> <p><i>Section 9.18 – Collective Investment Funds</i></p> <p><i>Section 344 – Record Keeping and Confirmation Requirements</i></p> <p><i>Section 208.34(g)(4) – Securities Trading Policies and Procedures</i></p> <p><i>Section 218 – Regulation R</i></p>	<p>✓</p> <p>✓</p> <p>✓</p>	
<p>Internal Revenue Code</p> <p><i>Section 584(b) Taxation of Common Trust Funds</i></p>	<p>✓</p>	
<p>Securities and Exchange Act</p> <p><i>Section 28(e)(3) (15 USC Section 78bb (e)(3))</i></p> <p><i>Rule 10b-5 (17 CFR Section 240.10b-5)</i></p>	<p>✓</p> <p>✓</p>	
<p>Texas Trust Company Act</p>		
<p><u>Texas Finance Code</u></p> <p><i>181.002(a)(7) - "Capital" Definition</i></p> <p><i>(8) - "Certified Surplus"</i></p> <p><i>182.101 - Amendment or Restatement of State Trust Company Certificate of Formation</i></p> <p><i>182.103 - Change in Restricted Capital</i></p> <p><i>182.104 - Capital Notes or Debentures</i></p> <p><i>183.001 - Acquisition of Control</i></p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

COMPLIANCE - GENERAL	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i>184.102 - Transactions in State Trust Company Shares or Participation Shares</i>	✓	
<i>184.301 - Trust Deposits</i>	✓	
Texas Administrative Code		
<u>Texas Property Code (Title 9. Trusts)</u>		
<i>Chapter 117 - Uniform Prudent Investor Act</i>		
<i>Section 113.055 - Purchase of Trustee's Securities</i>	✓	
<i>Section 113.056 - Authorization to Make Certain Investments</i>	✓	
<i>Section 113.057 - Deposits by Corporate Trustee with Itself</i>	✓	
POLICY ISSUANCES		
Department Policy Memorandum		
<i>1001 - Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</i>	✓	
<i>1002 - Trust Company Rating Systems</i>	✓	
FDIC Issuances		
<i><u>FIL-8-2014</u> Paying Agent Notification Requirements (2/7/2014)</i>	✓	
<i><u>FIL-6-2014</u> Registration of Municipal Advisors – Final Rule (1/31/2014)</i>	✓	
<i><u>FIL-89-2008</u> Securities Activities of Banks – Exceptions and Exemptions for Banks from the Definition of “Broker” (09/10/2008)</i>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

COMPLIANCE - GENERAL	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i>FIL-92-2007 Final Regulation R: Exceptions and Exemptions for Banks from the Definition of “Broker” (10/25/2007)</i>	✓	
Federal Reserve Issuances <i>FRB Regulation R Guidance: Exceptions for Banks from the Definition of Broker in the Securities Exchange Act of 1934 – A Small Entity Compliance Guide (8/2008)</i>	✓	
FFIEC Issuances <i>Uniform Interagency Trust Rating System</i>	✓	
Comptroller of the Currency Issuances		
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED MATERIAL		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

COMPLIANCE – EMPLOYEE BENEFIT	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
LAWS, RULES AND REGULATION		
<u>26 CFR Section 54.4975-11</u> - "ESOP" Requirements	✓	
<u>ERISA - Employee Retirement Income Security Act of 1974</u>		
<i>Section 3 - Definitions</i>	✓	
<i>Section 402 - Establishment of Plan</i>	✓	
<i>Section 403 - Establishment of Trust</i>	✓	
<i>Section 404 - Fiduciary Duties</i>	✓	
<i>Section 405 - Liability for Breach by Co-fiduciary</i>	✓	
<i>Section 406 - Prohibited Transaction</i>	✓	
<i>Section 407 - 10 Percent Limitation with Respect to Acquisition and Holding of Employer Securities and Employer Real Property by Certain Plans</i>	✓	
<i>Section 408 - Exemptions from Prohibited Transactions</i>	✓	
<i>Section 414 - Effective Date</i>	✓	
<i>Section 4065 - Annual Report of Plan Administrator</i>	✓	
<u>Internal Revenue Code</u>		
<i>Section 72(p) - Loans Treated as Distributions</i>	✓	
<i>Section 401(a)(28)(C) - Use of Independent Appraiser</i>	✓	
<i>Section 408(m) - Investment in Collectibles Treated as Distributions</i>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

COMPLIANCE – EMPLOYEE BENEFIT	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<u>Internal Revenue Ruling 59-60 Asset Valuations</u>	✓	
<i>Department of Labor Opinion Letter 10.422</i>	✓	
<u>Department of Labor Prohibited Transaction Exemption 93-1</u>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

COMPLIANCE – CORPORATE TRUST	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p>LAWS, RULES AND REGULATION</p> <p>Texas Finance Code</p> <p>Texas Trust Company Act</p> <p>Texas Administrative Code</p> <p><u>Texas Property Code</u></p> <p style="padding-left: 40px;"><i>Ch 117 - Texas Uniform Prudent Investor Act</i></p> <p><u>Trust Indenture Act of 1939</u></p> <p style="padding-left: 40px;"><i>Section 310 - Eligibility and Disqualification of Trustee</i></p> <p style="padding-left: 40px;"><i>Section 312 - Bondholders' Lists</i></p> <p style="padding-left: 40px;"><i>Section 313 - Reports By Indenture Trustee</i></p> <p style="padding-left: 40px;"><i>Section 314 - Reports By Obligor; Evidence of Compliance With Indenture Provisions</i></p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p>FDIC Issuances</p> <p>Federal Reserve Issuances</p> <p>FFIEC Issuances</p> <p>Comptroller of the Currency Issuances</p>		
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED MATERIAL		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#6—FIDUCIARY ASSET MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
LAWS, RULES AND REGULATIONS		
<u>26 CFR 9.18(b)(1) Written Plan</u>	✓	
<u>Internal Revenue Code</u>		
<i>Section 501(a) - Exemption From Tax on Corporations, Certain Trusts, etc.</i>	✓	
<i>Section 584 - Common Trust Funds</i>	✓	
<i>Internal Revenue Ruling 59-60 - Asset Valuations</i>	✓	
<i>Internal Revenue Ruling 81-100 - Tax Exemption</i>	✓	
Investment Company Act of 1940		
<u>80a-3 - Definition of Investment Company</u>	✓	
Regulation 9 - Code of Federal Regulations		
<u>12 CFR 9.18 Collective Investment Funds</u>	✓	
Securities Act of 1933		
<u>Rule 180 (Section 230.180) Exemption From Registrations</u>	✓	
TEXAS STATUTES		
<u>Texas Property Code</u>		
<u>Ch 117 - Texas Uniform Prudent Investor Act</u>		
<u>Ch 116 - Texas Uniform Principal & Income Act</u>		
<u>Section 113.053 - Purchase or Sale of Trust Property by Trustee</u>	✓	
<u>Section 113.055 - Purchase of Trustee's Securities</u>	✓	
<u>Section 113.056 - Authorization to Make Certain Investments</u>	✓	
<u>Section 113.057 - Deposits by Corporate Trustee with Itself</u>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#6—FIDUCIARY ASSET MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<u>Section 113.171</u> - Common Trust Funds	✓	
<u>Section 116.174</u> - Minerals, Water, and other Natural Resources	✓	
<u>Section 116.175</u> - Timber	✓	
Texas Finance Code		
Texas Administrative Code		
Texas Trust Company Act		
POLICY ISSUANCES		
Department Policy Memorandum		
1001 – Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations	✓	
1002 – Trust Company Rating Systems	✓	
FDIC Issuances		
Federal Reserve Issuances		
FFIEC Issuances		
<u>Uniform Interagency Trust Rating System</u>		
Comptroller of the Currency Issuances		
Comptroller’s Handbook:		✓
▪ <u>Asset Management</u> (12/2000)		✓
▪ <u>Asset Management Operations and Controls</u> (1/2011)		✓
▪ <u>Collective Investment Funds</u> (5/2014)		✓
▪ <u>Conflicts of Interest</u> (1/2015)		✓
▪ <u>Custody Services</u> (1/2002)		✓
▪ <u>Investment Management Services</u> (8/2001)		✓

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#6—FIDUCIARY ASSET MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<ul style="list-style-type: none"> ▪ <i>Personal Fiduciary Activities</i> (2/2015) ▪ <i>Retirement Plan Products and Services</i> (2/2014) ▪ <i>Unique and Hard-to-Value Assets</i> (8/2012) <p><i>OCC Bulletin 2008-10 Fiduciary Activities of National Banks: Annual Reviews of Fiduciary Accounts Pursuant to 12 CFR 9.6 (c) (3/27/2008)</i></p>		<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED MATERIAL		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#7—TRUST COMPANY CAPITAL ADEQUACY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
LAWS, RULES AND REGULATION		
Texas Trust Company Act		
<u>Texas Finance Code</u>		
<i>Section 181.002(a)(7) - Capital</i>	✓	
<i>(8) - Certified Surplus</i>	✓	
<i>(11) - Company</i>		
<i>Section 182.008 - Restricted Capital</i>	✓	
<i>Section 182.011 - Exemption from Statutory Provisions for Certain Trust Companies</i>	✓	
<i>Section 182.101 - Amendment or Restatement of State Trust Company Certificate of Formation</i>	✓	
<i>Section 182.103 – Change in Restricted Capital</i>	✓	
<i>Section 182.104 - Capital Notes or Debentures</i>	✓	
<i>Section 183.001 - Acquisition of Control</i>	✓	
<i>Section 184.002 - Investment in State Trust Company Facilities</i>	✓	
<i>Section 184.101 - Securities</i>	✓	
<i>Section 184.102 - Transactions in State Trust Company Shares or Participation Shares</i>	✓	
Texas Administrative Code		
<i>TAC §21.51 (a) Application for Change of Control</i>	✓	
<i>TAC §21.91 Acquisition and Retention of Shares as Treasury Stock</i>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#7—TRUST COMPANY CAPITAL ADEQUACY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p>Texas Business Organization Code</p> <p style="padding-left: 40px;"><i>Section §21.302 Authority for Distributions</i></p> <p>Texas Property Code</p>	✓	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p style="padding-left: 40px;"><i>SM 1002 - Trust Company Rating Systems</i></p> <p style="padding-left: 40px;"><i>SM 1009 - Strategic Planning</i></p> <p>FDIC Issuances</p> <p style="padding-left: 40px;"><i>FIL 46-2013 Managing Sensitivity to Market Risk in a Challenging Interest Rate Environment (10/8/13)</i></p> <p>Federal Reserve Issuances</p> <p>FFIEC Issuances</p> <p style="padding-left: 40px;"><i>Uniform Interagency Trust Rating System</i></p> <p>Comptroller of the Currency Issuances</p>	✓ ✓ ✓ ✓	
<p>GENERALLY ACCEPTED ACCOUNTING PRINCIPLES</p> <p style="padding-left: 40px;"><i>FASB 109 - Accounting for Deferred Tax Assets. See ASC 740-10 – Income Taxes</i></p>	✓	
<p>OTHER RELATED MATERIAL</p>		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#8–TRUST COMPANY ASSET QUALITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
LAWS, RULES AND REGULATIONS		
<u>12 CFR</u>		
<i>Section 215 (Regulation O) - Loans to Executive Officers, Directors, and Principal Shareholders</i>	✓	
<i>Section 225.63 - Appraisals Required</i>	✓	
<i>Section 323 – Appraisals</i>	✓	
Texas Trust Company Act		
<u>Texas Finance Code</u>		
<i>§34.105 - Other direct equity investments</i>	✓	
<i>§181.104 - Examination Requirements</i>	✓	
<i>§183.105 - Required Quarterly Board Meeting</i>	✓	
<i>§183.109 – Transaction with Management and Affiliates</i>	✓	
<i>§184.002 - Investment in State Trust Company Facilities</i>	✓	
<i>§184.003 - Other Real Property</i>	✓	
<i>§184.101 – Securities</i>	✓	
<i>§184.103 - State Trust Company Subsidiaries</i>	✓	
<i>§184.104 - Other Investments</i>	✓	
<i>§184.105 – Investments in Trade or Commerce Prohibited</i>	✓	
<i>§184.201 - Lending Limits</i>	✓	
Texas Administrative Code		
<i>7 TAC §17.23(d) – Call Reports</i>	✓	
<i>7 TAC §17.3 - Sale or lease agreements</i>	✓	
<i>7 TAC §19.22 Investments in Mutual Funds</i>	✓	
<i>7 TAC § 19.51 - Other Real Estate Owned</i>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#8-TRUST COMPANY ASSET QUALITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p>Texas Property Code</p> <p><u>Section 74.101</u> <i>Property Report</i></p>	✓	
<p>Federal Reserve Laws and Regulations</p> <p><u>Section 23 A & B</u> <i>of the Federal Reserve Act - Banking Affiliates</i></p> <p><u>12 USC 225.28</u> - <i>List of Permissible Non-Banking Activities (Regulation Y)</i></p>	✓ ✓	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p><i>1002 - Trust Company Rating Systems</i></p> <p><i>1032 - Policy for Other Real Estate Owned</i></p> <p>FDIC Issuances</p> <p><u>FIL 124-98</u> <i>Policy on Income Tax Remittance by Banks to Bank Holding (11/1998)</i> <u>Interagency Policy Statement on Income Tax Allocation in a Holding Company Structure</u></p> <p><u>FIL 98-2006</u> - <i>Guidelines for an Environmental Risk Program</i></p> <p>Federal Reserve Issuances</p> <p><u>Policy on Statement on the "Responsibility of Bank Holding Companies to Act as Sources of Strength to their Subsidiary Bank"</u></p> <p>Comptroller of the Currency Issuances</p> <p><u>Banking Circular 57 - Banking Holding Company Affiliates</u></p> <p><u>Comptroller's Handbook Insider Activities - Management and Other Fees</u></p> <p>FFIEC Issuances</p>	✓ ✓ ✓ ✓	✓ ✓ ✓

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#8–TRUST COMPANY ASSET QUALITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
Refer to FASB's Accounting Standards Codification (ASC)		
<i>FAS No. 12 - Accounting for Certain Marketable Securities (Superseded by FAS 115, paragraph 124)– See ASC 320-Investments – Debt and Equity Securities</i>	✓	
<i>FAS No. 13 - Accounting for Leases: See ASC 840 -Leases</i>	✓	
<i>FAS No. 28 - Accounting for Sales With Leasebacks - See ASC 840 –Leases</i>	✓	
<i>FAS No. 66 - Accounting for Sales of Real Estate - See ASC 360-20 Property, Plant and Equipment – Real Estate Sales</i>	✓	
<i>FAS No. 80 - Accounting for Future Contracts (Superseded by FAS 133, paragraph 525(a)) – See ASC 815 – Derivatives and Hedging</i>	✓	
<i>FAS No. 109 - Accounting for Deferred Income Taxes – See ASC 740-Income Taxes</i>	✓	
<i>FAS No. 115 - Accounting for Certain Investments in Debt and Equity Securities - See ASC 320-Investments – Debt and Equity Securities</i>	✓	
<i>FAS No. 142 – Goodwill and Other Intangible Assets – See ASC 350 – Intangibles – Goodwill and Other</i>	✓	
<i>Technical Bulletin 85-2: Accounting for Collateralized Mortgage Obligations (Superseded by FAS 125, paragraph 232, and FAS 140, paragraph 351(e)) – See ASC 860-10-40 Transfers and Servicing</i>	✓	
<i>Position 92-3 - "Accounting for Foreclosed Assets" See ASC 310 – Receivables</i>	✓	
OTHER RELATED MATERIAL		
<i>Miller GAAP Guide 23 - Intangible Assets</i>	✓	
<i>Miller GAAP Guide, Chapter 28 – Leases</i>	✓	

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#11–TRUST COMPANY LIQUIDITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p>LAWS, RULES AND REGULATION</p> <p>Texas Administrative Code</p> <p><u>7 TAC 17.23(g)(3) Call Reports</u></p> <p>Texas Property Code</p> <p><u>Texas Trust Company Act</u></p> <p><i>TFC Chapter 181</i></p> <p>Texas Finance Code</p> <p><i>Section 182.001(f) - Organization and General Powers of State Trust Company</i></p> <p><i>Section 184.101 - Securities</i></p> <p><i>Section 184.301 - Trust Deposits</i></p> <p><i>Section 184.401 - Borrowing Limit</i></p> <p><i>Section 184.402 - Pledge of Assets</i></p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p><i>SM 1002 - Trust Company Rating Systems</i></p> <p>FDIC Issuances</p> <p>Federal Reserve Issuances</p> <p><u>Bank Holding Company Supervision Manual: Information regarding Trust Company Subsidiaries</u> (Section 3040.0.2)</p> <p>FFIEC Issuances</p> <p><u>Policy on Repurchases Agreements of Depository Institutions with Securities Dealers and Others</u> (Rev. Feb-98)</p> <p>Comptroller of the Currency Issuances</p>	<p>✓</p> <p>✓</p>	<p>✓</p>
<p>GENERALLY ACCEPTED ACCOUNTING PRINCIPLES</p>		

TRUST REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

#11-TRUST COMPANY LIQUIDITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
OTHER RELATED MATERIAL		

REFERENCE MATERIAL
 (Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

APPLICABLE TO:

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
LAWS, RULES, AND REGULATIONS				
<u>USA PATRIOT Act (10/2001)</u>				
The Bank Secrecy Act				
<u>31 U.S.C. 5311-5314e</u> –				
<u>5316-5330</u>				
<u>5331</u>				
<u>5332e</u>				
<u>12 U.S.C. 1829b</u>				
<u>12 U.S.C. 1951-1959e</u>				
<u>Federal Crime of Money Laundering - Title 18, U.S. Code, Crimes and Criminal Procedure</u>				
<u>Federal Crime of Operating an Unlicensed or Unregistered Money Transmitting Business - Title 18 U.S. Code, Crimes and Criminal Procedure</u>				
Texas Finance Code				
<u>Chapter 152 Money Services Modernization Act</u>				
<u>152.004 Exemptions</u>				
✓				
Texas Administrative Code				
<u>7 TAC Chapter 33 Money Services Businesses (includes rules for Authorized Delegates)</u>				
✓				
U.S. Treasury/FinCEN –				
<u>31 CFR Chapter X (Effective March 1, 2011)</u>				
<u>General Cross Reference Index</u>				
31 CFR Part 103 (Effective through February 28, 2011)				
✓				
FDIC Laws & Regulations				
<u>12 CFR 326 Subpart B – Procedures for Monitoring Bank Secrecy Act Compliance</u>				
✓				
<u>12 CFR 353 – Suspicious Activity Reports</u>				
✓				

REFERENCE MATERIAL
(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
Federal Reserve Laws & Regulations -				
<i>Regulation H – 12 CFR 208.62 – Suspicious Activity Reports</i>			✓	
<i>Regulation H – 12 CFR 208.63- Procedures for Monitoring Bank Secrecy Act</i>			✓	
<i>Regulation K – 12 CFR 211.5(k) – Reports of Crimes and Suspected Crimes</i>			✓	
<i>Regulation K – 12 CFR 211.24(f) – Reports of Crimes and Suspected Crimes</i>			✓	
<i>Regulation Y – 12 CFR 225.4(f) – Suspicious Activity Report</i>			✓	
POLICY ISSUANCES				
Department Issuances				
<i>Industry Notice – IN 2021-02 Additional Anti-Money Laundering Program Requirements and Participation in 314(a) Program for Texas State-Chartered Public Trust Companies (6/7/2021)</i>				✓
<i>Supervisory Memorandum 1037 - Regulatory Treatment of Virtual Currencies Under the Texas Money Services Act</i>				✓
<i>Industry Notice - IN 2018-02 BSA Customer Due Diligence Requirements for Financial Institutions Now in Effect (05/16/2018)</i>	✓			
<i>Industry Notice - IN 2017-01 CSBS Issues BSA/AML Assessment Tool (01/18/2017)</i>	✓			
<i>Industry Notice – IN 2013-7 Mandatory BSA E-Filing Reminder for Banks and MSBs (02/15/2013)</i>	✓			
Internal Policies				
<i>Examiner Bulletin 2024-08 BSA/AML Transaction Testing Guidance (7/15/24)</i>				✓
<i>Examiner Bulletin 2024-02 BSA Violation Citations (2/27/24)</i>				✓
<i>Examiner Bulletin 2020-04 BSA/AML Risk-Focused Examination Procedures (9/18/20)</i>				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
FDIC Issuances				
<u>FIL-83-2024</u> <i>Agencies Issue Interagency Statement on Elder Financial Exploitation (12/3/24)</i>	✓			
<u>FIL-15-2024</u> <i>Collecting Identifying Information Required Under the Customer Identification Program (CIP) Rule (3/28/24)</i>	✓			
<u>FIL-67-2023</u> <i>Interagency Statement for Banks on the Issuance of the Beneficial Ownership Information Access Rule (12/21/23)</i>	✓			
<u>FIL-29-2023</u> <i>Interagency Guidance on Third-Party Relationships: Risk Management (6/6/23)</i>	✓			
<u>FIL-28-2022</u> <i>Joint Statement on the Risk-Based Approach to Assessing Customer Relationships and Conducting Customer Due Diligence(7/6/22)</i>	✓			
<u>FIL-76-2021</u> <i>Bank Secrecy Act/Anti-Money Laundering Examination Manual Update (12/1/21)</i>	✓			
<u>FIL-45-2021</u> <i>Bank Secrecy Act/Anti-Money Laundering Examination Manual Update (6/23/21)</i>	✓			
<u>FIL-27-2021</u> <i>Bank Secrecy Act: Agencies Address Model Risk Management for Bank Models and Systems Supporting Bank Secrecy Act/Anti-Money Laundering and Office of Foreign Assets Control Compliance (4/9/21)</i> <u>Interagency Statement</u>	✓			
<u>FIL-05-2021</u> <i>Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering (AML) Considerations (1/19/21)</i>	✓			
<u>PR-126-2020</u> / <u>FIL 106-2020</u> <i>Agencies Release Fact Sheet to Clarify Bank Secrecy Act Due Diligence Requirements for Banks and Credit Unions that Offer Services to Charities and Non-Profits (11/19/20)</i>	✓			
<u>FIL-95-2020</u> <i>Bank Secrecy Act: Customer Identification Program Rule Exemption for Insurance Premium Finance Loans (10/9/20)</i>	✓			
<u>FIL-78-2020</u> <i>Bank Secrecy Act: Joint Statement on Due Diligence Requirements for Customers Who May Be Considered Politically Exposed Persons (8/21/20)</i>	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>PR-91-2020</u> <i>Federal Banking Agencies Issue <u>Joint Statement</u> on Enforcement of Bank Secrecy Act/Anti-Money Laundering Requirements (8/13/2020)</i>	✓			
<u>FIL-78-2019</u> <i>Bank Secrecy Act: Interagency Statement on Providing Banking Services to Customers Engaged in Hemp Production (12/3/2019)</i>	✓			
<u>Press Release</u> <i>Federal Bank Regulatory Agencies and FinCEN Improve Transparency of Risk-Focused BSA/AML Supervision. <u>Joint Statement</u> (7/22/2019) <u>FIL-43-3019</u></i>	✓			
<u>FIL-55-2018</u> / <u>PR-68-2018</u> <i>Federal Agencies Issue a Joint Statement on Banks and Credit Unions Sharing Resources to Improve Efficiency and Effectiveness of Bank Secrecy Act Compliance (10/3/2018)</i>	✓			
<u>FIL-52-2018</u> <i>Bank Secrecy Act: Customer Identification Program Rule Exemption for Insurance Premium Finance Loans (9/28/2018)</i>	✓			
<u>FIL-26-2018</u> <i>FFIEC Issues New Customer Due Diligence and Beneficial Ownership Examination Procedures (05/11/2018)</i>	✓			
<u>FIL-21-2016</u> <i>Agencies Release Guidance to Issuing Banks on Applying Customer Identification Program Requirements to Holders of Prepaid Cards (03/21/2016)</i>	✓			
<u>FIL-5-2015</u> <i>Statement on Providing Banking Services (01/28/2015)</i>	✓			
<u>FIL-41-2014</u> <i>FDIC Clarifying Supervisory Approach to Institutions Establishing Account Relationships with Third-Party Payment Processors (07/28/2014)</i>	✓			
<u>FIL-43-2013</u> <i>FDIC Supervisory Approach to Payment Processing Relationships With Merchant Customers That Engage in Higher-Risk Activities (09/27/2013)</i>	✓			
<u>PR-84-2013</u> <i>Federal Regulators Issue Guidance on Reporting Financial Abuse of Older Adults (09/24/2013)</i>	✓			
<u>FIL-3-2012</u> <i>Payment Processor Relationships- Revised Guidance (01/31/2012) <u>Guidance</u></i>	✓			
<u>FDIC Supervisory Insights-Summer 2011</u> - "Managing Risks in Third-Party Payment Processor Relationships" (07/21/2011)				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIL-17-2011</u> - Bank Secrecy Act - Guidance on Accepting Accounts from Foreign Embassies, Consulates, and Missions (03/24/2011)	✓			
<u>FIL-15-2011</u> Reorganization of FinCEN's Bank Secrecy Act Regulations (03/15/2011)	✓			
<u>FIL-72-2009</u> Interagency Guidance on Transparency for U.S. Banking Organizations Conducting Cross Border Funds Transfers (12/17/2009)	✓			
<u>FIL-127-2008</u> Guidance on Payment Processor Relationships (11/07/2008)	✓			
<u>PR-79-2008</u> FDIC and TX DOB Execute Information Sharing Agreement (09/15/2008)	✓			
<u>FIL-38-2008</u> Provision for Independent Testing for BSA/AML Compliance (05/16/2008)		✓		
<u>FIL-113-2007</u> Final Regulation Implementing Section 312- Special Due Diligence Programs for Certain Foreign Accounts (12/21/2007)	✓			
<u>PR-61-2007</u> Agencies Issue Statement on Enforcement of Bank Secrecy Act/Anti-Money Laundering Requirements (07/19/2007)	✓			
<u>FIL-40-2006</u> Increasing Trend of Smuggling Currency from the U.S. into Mexico (05/04/2006)				✓
<u>FIL-9-2006</u> Office of Foreign Assets Control Enforcement Guidelines (Interim Final Rule) (02/01/2006)	✓			
<u>FIL-05-2006</u> Agencies and FinCEN Guidance on Sharing Suspicious Activity Reports with Controlling Companies (01/20/2006)	✓			
<u>PR-60-2005</u> Agencies Release BSA/AML Examination Manual, Outreach Fact Sheet and Q&A (6/30/2005)	✓			
<u>FIL-34-2005</u> Guidance on Customer Identification Programs (4/28/2005)	✓			
<u>FIL 32-2005</u> Interpretive Guidance on Providing Banking Services to Money Services Businesses Operating in the United States (4/26/2005)	✓			
<u>FIL-24-2005</u> Bank Secrecy Act: Statement on Money Services Businesses	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIL-121-2004</u> <i>Developing an Effective Computer Software Evaluation Program to Assure Quality and Regulatory Compliance (11/16/2004)</i>	✓			
<u>FIL 90-2004</u> <i>Guidance on Customer Identification Programs (7/28/2004)</i>	✓			
<u>FIL-72-2004</u> <i>Guidance on Accepting Accounts from Foreign Governments, Foreign Embassies and Foreign Political Figures (06/16/2004)</i>	✓			
<u>FIL 28-2004</u> <i>New Currency Transaction Report (3/16/2004)</i>	✓			
<u>FIL 4-2004</u> <i>Anti-Money Laundering Guidance on Customer Identification Programs (1/9/2004)</i>		✓		
<u>FIL-42-2003</u> <i>–Final Rule on Customer Identification Programs (5/27/2003)</i>	✓			
<u>FIL 136-2002</u> <i>-Final Rule Implementing Sections of the USA Patriot Act that address correspondent accounts for Foreign Shell Banks (12/11/2002)</i>		✓		
<u>FIL 111-2002</u> <i>-Foreign Assets Control Act/Frequently Asked Questions (9/18/2002)</i>		✓		
<u>FIL 82-2002</u> <i>-Amended Statement of Policy on Bank Merger Act Transactions - “Anti-Money Laundering Record” (7/30/2002)</i>		✓		
<u>FIL-59-2002</u> <i>Guidance for Financial Institutions in Detecting Terrorist Financing (06/07/2002)</i>	✓			
<u>FIL 106-2001</u> <i>-Privacy of Consumer Financial Information (12/20/2001)</i>	✓			
<u>FIL-6-2001</u> <i>-Guidance on Enhanced Scrutiny for Transactions that May Involve the Proceeds of Foreign Official Corruption (01/22/2001)</i>	✓			
Federal Reserve Issuances				
<u>Press Release</u> : <i>Agencies Issue Guide to Assist Community Banks to Develop and Implement Third-Party Risk Management Practices (5/3/24)</i>	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON-FED MEM	STATE FED MEM	REF ONLY
<u>SR-12-11</u> <i>Interagency Statement for Banks on the Issuance of the Beneficial Ownership Information Access Rule (12/21/23)</i>			✓	
<u>SR 21-8</u> <i>Interagency Statement on Model Risk Management for Bank Systems Supporting Bank Secrecy Act/Anti-Money Laundering Compliance (4/9/21)</i>			✓	
<u>SR 21-2</u> <i>Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations (1/19/21)</i>			✓	
<u>Press Release</u> : Agencies Release <u>Fact Sheet</u> to Clarify Bank Secrecy Act Due Diligence Requirements for Banks and Credit Unions That Offer Services to Charities and Non-Profits (11/19/20)	✓			
<u>SR 20-21</u> <i>Joint Statement on Bank Secrecy Act Due Diligence Requirements for Customers Who May Be Considered Politically Exposed Persons (8/21/20)</i>			✓	
<u>Press Release</u> Federal Banking Agencies Issue Joint Statement on Enforcement of Bank Secrecy Act/Anti-Money Laundering Requirements (8/13/2020)	✓			
<u>SR 20-11</u> : Release of Updated Sections of the Federal Financial Institutions Examination Council's Bank Secrecy Act/Anti-Money Laundering Examination Manual (4/15/20)			✓	
<u>SR 19-11</u> <i>Joint Statement on Risk-Focused BSA/AML Supervision. <u>Joint Statement</u> (7/22/2019)</i>			✓	
<u>SR 18-8</u> <i>Federal Agencies Issue a Joint Statement on Banks and Credit Unions Sharing Resources to Improve Efficiency and Effectiveness of Bank Secrecy Act Compliance (10/3/2018)</i>			✓	
<u>SR 18-6</u> <i>Bank Secrecy Act: Customer Identification Program Rule Exemption for Insurance Premium Finance Loans (9/28/2018)</i>			✓	
<u>SR 16-7</u> <i>Interagency Guidance to Issuing Banks on Applying Customer Identification Program Requirements to Holders of Prepaid Access Cards (3/21/2016)</i>			✓	
FedLinks Bulletin on " <u>Bank Secrecy Act/Anti-Money Laundering Compliance</u> " (12/2015)				✓
<u>News Release</u> - FinCEN, Federal Reserve Finalize Rule Amending Definitions of "funds transfer" and "transmittal of funds" in the Bank Secrecy Act (12/3/2013)	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>SR 11-6</u> <i>Guidance on Accepting Accounts from Foreign Embassies, Consulates and Missions (foreign missions) (03/24/2011)</i>	✓			
<u>SR 10-11</u> <i>Interagency Examination Procedures for Reviewing Compliance With the Unlawful Internet Gambling Enforcement Act of 2006 (05/20/2010)</i>	✓			
<u>SR 10-8</u> <i>Suspicious Activity Report Filing Requirements for Banking Organizations Supervised by the Federal Reserve (04/27/2010)</i>			✓	
<u>SR 08-08</u> <i>Compliance Risk Management Programs and Oversight at Large Banking Organizations with Complex Compliance Profiles (10/16/2008)</i>			✓	
<u>SR 06-07</u> <i>Amendments to Regulation K to Require Bank Secrecy Act Compliance Program Requirement (03/20/2006)</i>			✓	
FFIEC Issuances				
<u>Press Release</u> : <i>Federal and State Regulators Release Updates to BSA/AML Examination Manual (4/15/20)</i>	✓			
<u>Press Release</u> : <i>FFIEC Issues New Customer Due Diligence and Beneficial Ownership Examination Procedures (05/11/2018)</i>	✓			
<u>FFIEC BSA/AML Examination InfoBase</u>	✓			✓
Office of Foreign Asset Control (OFAC)				
<u>Advisory on Potential Sanctions Risks for Facilitating Ransomware Payment</u> (10/1/20)	✓			
<u>OFAC Frequently Asked Questions</u> (added 2/12/20)				✓
<u>Press Release</u> : <i>OFAC Issues A Framework for OFAC Compliance Commitments (5/2/2019)</i> <u>Framework</u>	✓			
<u>Frequently Asked Question in connection with the President's Announcement on Changes to U.S. Policy with Respect to Cuba.</u> (12/17/14)	✓			
<u>OFAC Releases New SDN Search Tool</u> (3/13/13) SDN Search is available at http://sdnsearch.ofac.treas.gov/	✓			
<u>OFAC Civil Penalties and Enforcement Information</u> (added 2/12/20)				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>Financial Sanctions</u>	✓			
FinCEN Advisories Related to Certain Countries				
<u>Advisories Related to Activities in Certain Countries</u> (Various Dates)	✓			
FinCEN Issuances				
<u>Press Release: FinCEN Renews Residential Real Estate Geographic Targeting Orders</u> (4/14/25)	✓			
<u>Press Release: FinCEN Issues Alert on Bulk Cash Smuggling and Repatriation by Mexico-based Transnational Criminal Organizations</u> (3/31/25)	✓			
<u>Press Release: FinCEN Removes Beneficial Ownership Reporting Requirements for U.S. Companies and U.S. Persons, Sets New Deadlines for Foreign Companies</u> (3/21/25)	✓			
<u>News Release: FinCEN Issues Southwest Border Geographic Targeting Order</u> (3/11/25)	✓			
<u>News Release: FinCEN Not Issuing Fines or Penalties in Connection with Beneficial Ownership Information Reporting Deadlines</u> (2/27/25)	✓			
<u>News Release: Financial Action Task Force Identifies Jurisdictions with Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Finance Deficiencies</u> (2/26/25)	✓			
<u>Alert: Alert on Impact of Ongoing Litigation – Deadline Stay – Voluntary Submission Only of Beneficial Ownership Information Reports</u> (12/27/24)	✓			
<u>FIN-2024-Alert005: FinCEN Warns of Fraud Schemes That Abuse Its Name, Insignia, and Authorities for Financial Gain</u> (12/18/24)	✓			
<u>News Release: FinCEN Issues Alert on Fraud Schemes Involving Deepfake Media Targeting Financial Institutions</u> (11/13/24)	✓			
<u>News Release: Financial Action Task Force Identifies Jurisdictions with AntiMoney Laundering, Combating the Financing of Terrorism, and CounterProliferation Finance Deficiencies</u> (10/30/24)	✓			
<u>FIN-2024-NTC7: FinCEN Provides Beneficial Ownership Information Reporting Relief to Victims of Hurricane Beryl; Certain Filing Deadlines in Affected Areas Extended Six Months</u> (10/29/24)	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>News Release: FinCEN Issues Alert to Financial Institutions to Counter Financing of Hizballah and its Terrorist Activities (10/23/24)</u>	✓			
<u>News Release: FinCEN Publishes Beneficial Ownership Reporting Outreach and Education Toolkit (9/19/24)</u>	✓			
<u>Final Rule: Anti-Money Laundering/Countering the Financing of Terrorism Program and Suspicious Activity Report Filing Requirements for Registered Investment Advisers and Exempt Reporting Advisers (8/28/24)</u>	✓			
<u>Final Rule: Anti-Money Laundering Regulations for Residential Real Estate Transfers (8/28/24)</u>	✓			
<u>News Release: FinCEN Reminds Financial Institutions to Remain Vigilant to Suspicious Transactions Associated with Synthetic Opioids (8/26/24)</u>	✓			
<u>Press Release: FinCEN Finalizes Financial Measure Against Iraq-based Al-Huda Bank to Combat Terrorist Financing (6/26/24)</u>	✓			
<u>FIN-2024-A001: FinCEN Issues Advisory on Iran-Backed Terrorist Organizations (5/8/24)</u>	✓			
<u>Press Release: FinCEN Reminds Financial Institutions to Remain Vigilant to Environmental Crimes (4/22/24)</u>	✓			
<u>Press Release: FinCEN Renews Real Estate Geographic Targeting Orders (4/17/24)</u>	✓			
<u>FIN-2024-R001: FinCEN Publishes an Administrative Ruling Regarding Customer Identification Program and Customer Due Diligence Requirements for Designated Beneficiaries of Individual Retirement Accounts (3/15/24)</u>	✓			
<u>Press Release: Financial Action Task Force Identifies Jurisdictions with Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Deficiencies (2/29/24)</u>	✓			
<u>Press Release: FinCEN Issues Final Rule Regarding Access to Beneficial Ownership Information (12/21/23)</u>	✓			
<u>Press Release - FinCEN Finalizes Rule on Use of FinCEN Identifiers in Beneficial Ownership Information Reporting (11/7/23)</u>	✓			
<u>Press Release - FinCEN Alert to Financial Institutions to Counter Financing to Hamas and Its Terrorist Activities (10/20/23)</u>	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON-FED MEM	STATE FED MEM	REF ONLY
<u>Press Release</u> : <i>Supplemental Alert: FinCEN and the U.S. Department of Commerce’s Bureau of Industry and Security Urge Continued Vigilance for Potential Russian Export Control Evasion Attempts (5/19/23)</i>	✓			
<u>Press Release</u> : <i>FinCEN Renews and Expands Real Estate Geographic Targeting Orders (4/21/23)</i>				✓
<u>Press Release</u> <i>FinCEN Issues Initial Beneficial Ownership Information Reporting Guidance (3/24/23)</i>	✓			
<u>Press Release</u> <i>Financial Action Task Force Suspends the Membership of the Russian Federation, and Identifies Jurisdictions with Anti-Money Laundering and Combating the Financing of Terrorism and Counter-Proliferation Deficiencies (3/9/23)</i>				✓
<u>Press Release</u> <i>FinCEN Alert on Nationwide Surge in Mail Theft-Related Check Fraud Schemes Targeting the U.S. Mail (2/27/23)</i>	✓			
<u>News Release</u> <i>FinCEN Alert on Potential U.S. Commercial Real Estate Investments by Sanctioned Russian Elites, Oligarchs, and Their Proxies (1/25/23)</i>	✓			
<u>News Release</u> <i>FinCEN Issues Alert on Human Smuggling Along the Southwest Border of the United States (1/13/23)</i>	✓			
<u>News Release</u> <i>New FinCEN Analysis of BSA Data Reveals Trends on the Financial Activity of Russian Oligarchs (1/22/23)</i>				✓
<u>News Release</u> <i>FinCEN Issues Notice of Proposed Rulemaking Regarding Access to Beneficial Ownership Information and Related Safeguards (12/15/22)</i> <u>NPRM Fact Sheet</u>	✓			
<u>Press Release</u> - <i>FinCEN Issues Final Rule for Beneficial Ownership Reporting to Support Law Enforcement Efforts, Counter Illicit Finance, and Increase Transparency (9/29/22)</i> <i>The effective date for the rule is January 1, 2024.</i>	✓			
<u>FIN-2022-Alert003</u> <i>FinCEN and the U.S Department of Commerce’s Bureau of Industry and Security Urge Increased Vigilance for Potential Russian and Belarusian Export Control Evasion Attempts (6/28/22)</i>	✓			
<u>Press Release</u> – <i>Joint Statement on the Risk-Based Approach to Assessing Customer Relationships and Conducting Customer Due Diligence (7/6/2022)</i>	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON-FED MEM	STATE FED MEM	REF ONLY
<u>Press Release</u> <i>Statement on BSA Due Diligence for Independent ATM Owners or Operators (6/22/22)</i>	✓			
<u>FIN-2022-A001</u> <i>Advisory on Elder Financial Exploitation (6/15/2022)</i>	✓			
<u>Press Release</u> : <i>FinCEN Issues Advisory on Kleptocracy and Foreign Public Corruption (4/14/2022)</i>	✓			
<u>FIN-2022-A001</u> <i>Advisory on Kleptocracy and Foreign Public Corruption (4/14/2022)</i>	✓			
<u>Press Release</u> : <i>FinCEN Announces Actions to Support REPO Multilateral Task Force and Ongoing U.S. Government Efforts to Combat Foreign Government Corruption (3/16/2022)</i>	✓			
<u>FIN-2022-Alert002</u> : <i>FinCEN Alert on Real Estate, Luxury Goods, and Other High-Value Assets Involving Russian Elites, Oligarchs, and their Family Members (3/16/2022)</i>	✓			
<u>Press Release</u> : <i>FinCEN Renews Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (10/29/21)</i>				✓
<u>FIN-2021-A004</u> <i>Advisory on Ransomware and the Use of the Financial System to Facilitate Ransom Payments (11/8/21)</i>	✓			
<u>Press Release</u> : <i>FinCEN Issues Report on Ransomware Trends in Bank Secrecy Act Data Between January 2021 and June 2021 (10/15/21)</i>				✓
<u>Press Release</u> : <i>FinCEN Provides FBAR Relief to Victims of Recent Natural Disasters (10/5/21)</i>				✓
<u>FIN-2021-NTC3</u> <i>FinCEN Calls Attention to Online Child Sexual Exploitation Crimes (9/16/21)</i>	✓			
<u>Press Release</u> : <i>FinCEN Issues First National AML/CFT Priorities and Accompanying Statements (6/30/21)</i>	✓			
<u>Press Release</u> : <i>FinCEN Reissues Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (4/29/21)</i>				✓
<u>FIN-2021-NTC2</u> <i>FinCEN Informs Financial Institutions of Efforts Related to Trade in Antiquities and Art (3/9/21)</i>	✓			
<u>FIN-2021-A002</u> <i>Advisory on Financial Crimes Targeting COVID-19 Economic Impact Payments (2/24/21)</i>	✓			

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIN-2021-A001</u> <i>Advisory on COVID-19 Health Insurance and Health Care-Related Fraud (2/2/21)</i>	✓			
<i>FinCEN and Federal Banking Agencies <u>Issue Frequently Asked Questions</u> Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Requirements (1/19/21)</i>	✓			
<i><u>Press Release</u> – FinCEN Asks Financial Institutions to Stay Alert to COVID-19 Vaccine-Related Scams and Cyberattacks (12/28/20)</i>	✓			
<i><u>Press Release</u> - FinCEN and Federal Banking Agencies Clarify BSA Due Diligence Expectations for Charities and Non-Profit Customers (11/19/20)</i>	✓			
<i><u>Press Release</u> - FinCEN and Federal Banking Agencies Clarify BSA Due Diligence Expectations for Charities and Non-Profit Customers (11/19/20) <u>Fact Sheet</u>.</i>	✓			
<i><u>Press Release</u> FinCEN Reissues Real Estate <u>Geographic Targeting Orders</u> for 12 Metropolitan Areas (11/5/20)</i>				✓
<i><u>FIN-2020-A008</u> Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity (10/13/20)</i>	✓			
<i><u>FIN-2020-A007</u> Advisory on Unemployment Insurance Fraud During the Coronavirus Disease 2019 (COVID-19) Pandemic (10/13/20)</i>	✓			
<i><u>Press Release</u> - Federal Banking Agencies and FinCEN Announce <u>Exemption</u> from Customer Identification Program Requirements for Premium Finance Loans (10/9/2020)</i>	✓			
<i><u>FIN-2020-A006</u> Advisory on Ransomware and the Use of the Financial System to Facilitate Ransom Payments (10/1/20)</i>	✓			
<i><u>Press Release</u> – Statement by FinCEN Regarding Unlawfully Disclosed Suspicious Activity Reports (9/1/20)</i>	✓			
<i><u>Press Release</u> – Agencies Issue Statement on Bank Secrecy Act Due Diligence Requirements for Customers Who May Be Considered Politically Exposed Persons_(8/21/2020)</i>	✓			
<i><u>FinCEN Statement on Enforcement of the Bank Secrecy Act</u> (8/18/2020)</i>				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIN-2020-G002</u> <i>Frequently Asked Questions Regarding Customer Due Diligence (CDD) Requirements for Covered Financial Institutions (8/3/2020)</i>	✓			
<u>FIN-2020-A005</u> <i>Advisory on Cybercrime and Cyber-Enabled Crime Exploiting the Coronavirus Disease 2019 (COVID-19) Pandemic (7/30/2020)</i>	✓			
<u>FIN-2020-Alert001</u> <i>Financial Crimes Enforcement Network Alerts Financial Institutions to Convertible Virtual Currency Scam Involving Twitter (7/16/2020)</i>	✓			
<u>FIN-2020-A003</u> <i>Advisory on Imposter Scams and Money Mule Schemes Related to Coronavirus Disease 2019 (COVID-19) (7/7/2020)</i>	✓			
<u>FIN-2020-G001</u> <i>FinCEN Guidance Regarding Due Diligence Requirements under the Bank Secrecy Act for Hemp-Related Business Customers (6/29/2020)</i>	✓			
<u>FinCEN Advisory FIN-2020-A002</u> <i>Advisory on Medical Scams Related to the Coronavirus Disease 2019 (COVID-19) (5/18/20)</i>	✓			
<u>FinCEN Notice FIN-2020-NTC3</u> - <i>Notice Related to the Coronavirus Disease 2019 (COVID-19) (5/18/20)</i>	✓			
<u>Press Release</u> : <i>FinCEN Reissues Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (5/8/20)</i>	✓			
<u>Paycheck Protection Program Frequently Asked Questions</u> (4/13/20)	✓			
<u>Press Release</u> : <i>The Financial Crimes Enforcement Network Provides Further Information to Financial Institutions in Response to the Coronavirus Disease 2019 (COVID-19) Pandemic (4/3/20)</i>	✓			
<u>FinCEN Notice FIN-2020-NTC2</u> - <i>Updated FinCEN Notice to Financial Institutions Regarding COVID-19 (4/3/20)</i>	✓			
<u>Press Release</u> : <i>The Financial Crimes Enforcement Network (FinCEN) Encourages Financial Institutions to Communicate Concerns Related to the Coronavirus Disease 2019 (COVID-19) and to Remain Alert to Related Illicit Financial Activity (3/16/20)</i>	✓			
<u>FinCEN Notice FIN-2020-NTC1</u> - <i>FinCEN Notice to Financial Institutions Regarding COVID-19 (3/16/20)</i>	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>Press Release</u> : <i>FinCEN Reissues Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (11/08/19)</i>	✓			
<u>Press Release</u> : <i>Imposition of Fifth Special Measure against the Islamic Republic of Iran as a Jurisdiction of Primary Money Laundering Concern (10/25/19)</i>	✓			
<u>FIN-2019-A006</u> <i>Advisory to Financial Institutions on Illicit Financial Schemes and Methods Related to the Trafficking of Fentanyl and Other Synthetic Opioids (8/21/19)</i>	✓			
<u>FIN-2019-A005</u> <i>Updated Advisory on Email Compromise Fraud Schemes Targeting Vulnerable Business Processes (7/16/2019)</i>	✓			
<u>News Release</u> – <i>FinCEN Reissues Real Estate Geographic Targeting Orders and Expands Coverage to 12 Metropolitan Areas (5/15/2019)</i>	✓			
<u>News Release</u> : <i>New FinCEN Guidance Affirms Its Longstanding Regulatory Framework for Virtual Currencies and a New FinCEN Advisory Warns of Threats Posed by Virtual Currency Misuse (5/9/2019)</i>	✓			
<u>FIN-2019-G001</u> - <i>Application of FinCEN’s Regulations to Certain Business Models Involving Convertible Virtual Currencies (5/9/2019)</i>	✓			
<u>FIN-2019-A003</u> - <i>Advisory on Illicit Activity Involving Convertible Virtual Currency (5/9/2019)</i>	✓			
<u>News Release</u> - <i>Updated FinCEN Advisory Warns Against Continued Corrupt Venezuelan Attempts to Steal, Hide, or Launder Money (5/3/2019)</i> <u>FIN-2019-A002</u>	✓			
<u>News Release</u> – <i>FinCEN Reissues Real Estate Geographic Targeting Orders and Expands Coverage to 12 Metropolitan Areas (11/15/2018)</i>	✓			
<u>FIN-2018-R004</u> <i>Exemptive Relief from Beneficial Ownership Requirements for Legal Entity Customers of Rollovers, Renewals, Modifications, and Extensions of Certain Accounts (9/7/2018)</i>	✓			
<u>FIN 2018-R003</u> <i>Extension of Limited Exception from Beneficial Ownership Requirements for Legal Entity Customers of Certain Financial Products and Services with Rollovers and Renewals (8/08/2018)</i> <u>Press Release</u>	✓			

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CITE	ALL STATE BANKS	NON-FED MEM	STATE FED MEM	REF ONLY
<u>FIN-2018-A003</u> <i>Advisory on Human Rights Abuses Enabled by Corrupt Senior Foreign Political Figures and their Financial Facilitators (06/12/2018)</i>	✓			
<u>FIN-2018-R002</u> <i>Administrative Ruling: Beneficial Ownership Requirements for Legal Entity Customers of Certain Financial Products and Services with Automatic Rollovers or Renewals (05/16/2018)</i>	✓			
<u>FIN-2018-R001</u> <i>Administrative Ruling: Premium Finance Cash Refunds and Beneficial Ownership Requirements for Legal Entity Customers (05/11/2018)</i>	✓			
<u>Press Release</u> : <i>FinCEN Reminds Financial Institutions that the CDD Rule Becomes Effective Today (05/11/2018)</i>	✓			
<u>FIN-2018-G001</u> <i>Customer Due Diligence and Beneficial Ownership - BSA FAQs (4/3/2018)</i>	✓			
<u>Notice to E-Filers: FinCEN Announces Update to the Suspicious Activity Report (SAR)</u> <i>(Changes available in June of 2018) (01/26/2018)</i>	✓			
<u>BSA FAQ's</u> <i>(12/15/2017)</i>	✓			
<u>FIN-2017-A008</u> <i>Advisory on North Korea's Use of the International Financial System (11/2/2017)</i>	✓			
<u>FIN-2017-A007</u> <i>Advisory to Financial Institutions Regarding Disaster-Related Fraud (10/31/2017)</i>	✓			
<u>Notice</u> <i>FinCEN Provides FBAR Relief to Victims of Hurricane Harvey; Parts of Texas Now Eligible; Extension Filers Have Until January 31, 2018 to File (Revised) (10/3/2017)</i>	✓			
<u>Notice</u> <i>FinCEN Encourages Communication from Financial Institutions Affected by Hurricanes Harvey, Irma, and Maria (10/3/2017)</i>	✓			
<u>FIN-2017-A006</u> <i>Advisory to Financial Institutions on Widespread Political Corruption in Venezuela (9/20/2017)</i>	✓			
<u>Memorandum on Financial Institution and Law Enforcement Efforts to Combat Elder Financial Exploitation</u> <i>(8/30/2017)</i>				✓

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>Advisory FIN-2017-A003</u> <i>Advisory to Financial Institutions and Real Estate Firms and Professionals (8/22/2017)</i>	✓			
<u>News Release</u> <i>FinCEN Targets Shell Companies Purchasing Luxury Properties in Seven Major Metropolitan Areas / Revised <u>Geographic Targeting Orders</u> (8/22/2017)</i>	✓			
<u>FAQs</u> <i>Regarding Customer Due Diligence Requirements for Financial Institutions (7/19/2017)</i>	✓			
<u>Announcement</u> <i>Important Notices to E-Filers: FinCEN Announces Update to the Currency Transaction Report (CTR) Announces Technical Webinar (5/24/2017)</i>	✓			
<u>News Release</u> <i>FinCEN Renews Real Estate “Geographic Targeting Orders” to Identify High-End Cash Buyers in Six Major Metropolitan Areas (2/23/2017)</i>	✓			
<u>FIN-2016-A005</u> <i>Advisory to Financial Institutions on Cyber-Events and Cyber-Enabled Crime (10/25/2016)</i>	✓			
<u>Frequently Asked Questions</u> <i>Regarding Reporting of Cyber-Events, Cyber-Enabled Crime, and Cyber-Related Information through Suspicious Activity Reports (SARS) (10/25/2016)</i>	✓			
<u>FIN-2016-A003</u> <i>Advisory to Financial Institutions on E-Mail Compromise Fraud Schemes (9/6/2016)</i>	✓			
<u>Final Rule</u> – <i>Customer Due Diligence Requirements for Financial Institutions (5/11/2016)</i>	✓			
<u>FIN-2016-G002</u> <i>FAQs Regarding Prepaid Access (3/24/2016)</i>				✓
<u>News Release</u> <i>FinCEN Renews and Broadens Geographic Targeting Orders on Border Cash Shipments in California and Texas (8/7/2015)</i>	✓			
<u>News Release</u> <i>FinCEN Statement on Providing Banking Services to Money Services Businesses (11/10/2014)</i>	✓			
<u>FIN -2014-R011</u> <i>FinCEN Ruling on Request for Administrative Ruling on the Application of FinCEN’s Regulations to a Virtual Currency Trading Platform (10/27/2014)</i>				✓

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIN-2014-R012</u> <i>FinCEN Ruling on Request for Administrative Ruling on the Application of FinCEN's Regulations to a Virtual Currency Payment System (10/27/2014)</i>				✓
<u>FIN-2014-R010</u> <i>Administrative Ruling on the Application of FinCEN Regulations to Currency Transporters, Including Armored Car Services (9/24/2014)</i>	✓			
<u>FIN-2014-A008</u> <i>Advisory: Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags (9/11/2014)</i>	✓			
<u>FIN-2014-A007</u> <i>Advisory to U.S. Financial Institutions on Promoting a Culture of Compliance (08/11/14)</i>	✓			
<u>FIN-2014-G002</u> <i>CMIR Guidance for Common Carriers of Currency, Including Armored Car Services (08/01/2014)</i>	✓			
<u>FIN-2014-A005</u> <i>FinCEN Issues Update on U.S. Currency Restrictions in Mexico Regarding Funnel Accounts and TBML (05/28/2014)</i>	✓			
<u>FIN-2014-A004</u> <i>FinCEN Issues Advisory on Abuse of the Citizenship-by-Investment Program Sponsored by the Federation of St. Kitts and Nevis (05/20/2014)</i>	✓			
<u>FIN-2014-R003</u> <i>Records to be Made and Maintained by Dealers in Foreign Exchange (03/11/2014)</i>	✓			
<u>FIN 2014-A002</u> <i>Updated Guidance to Financial Institutions on Recent Events related to the Departure of Victor Yanukovych and Other Ukrainian Officials (03/06/2014)</i>	✓			
<u>FIN 2014-G001</u> <i>Guidance to Financial Institutions on Marijuana Businesses (02/14/2014)</i>	✓			
<u>FIN-2014-R001</u> <i>Application of FinCEN's Regulations to Virtual Currency Mining Operations (1/30/14)</i>				✓
<u>FIN-2014-R002</u> <i>Application of FinCEN's Regulations to Virtual Currency Software Development and Certain Investment Activity (1/30/14)</i>				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIN-2013-A007</u> Supplement on U.S. Currency Restrictions on Banks in Mexico (09/27/2013)				✓
<u>FIN-2013-R001</u> FinCEN Issues Ruling on Armored Car Service Transactions - Addresses CTR Filings When Customers Use Armored Cars (7/12/2013)	✓			
<u>FAQs regarding the FINCEN Currency Transaction Report</u> (4/1/2013)	✓			
<u>FAQs Regarding the FinCEN Suspicious Activity Report</u> (4/1/2013)	✓			
<u>FIN 2013-G001</u> FinCEN Issues Guidance on Virtual Currencies and Regulatory Responsibilities (3/18/13)				✓
<u>FIN-2013-A001</u> FinCEN Issues Advisory to Financial Institutions: Update on Tax Refund Fraud and Related Identity Theft (2/26/13)	✓			
<u>FIN 2012-A010</u> - Risk Associated with Third Party Payment Processors (10/22/2012)	✓			
<u>FIN 2012-G005</u> Definition of Motor Vehicles of Any Kind, Motor Vehicles, Vessels, Aircraft, and Farm Equipment as it Relates to Potential CTR Exemption for a Non-Listed Business (09/10/2012)	✓			
Notice - <u>Important Notice to Non-Bank Residential Mortgage Lenders and Originators</u> (08/13/2012)	✓			
<u>FIN 2012-R005</u> - FinCEN Ruling -Compliance Obligations of Certain Loan or Finance Company Subsidiaries of Federally Regulated Banks and Other Financial Institutions (07/19/2012)	✓			
<u>FIN 2012-A006</u> - Update on U.S. Currency Restrictions in Mexico (07/18/2012)	✓			
Press Release - <u>FinCEN Assesses Suspicious Activity Involving Title and Escrow Companies</u> (07/11/2012)				✓
Press Release - <u>FinCEN Marks the End of Paper SARs and CTRs - Final Reminder for Electronic Filing Requirement</u> (06/29/2012)	✓			
<u>FIN-2012-G003</u> Guidance on Determining Eligibility for Exemption from Currency Transaction Reporting Requirements (06/11/2012)	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>Final Rule</u> - Amendment to the Bank Secrecy Act Regulations-Exemption From the Requirement To Report Transactions in Currency (as submitted to the Federal Register) (06/04/2012)	✓			
<u>FIN-2012-A005</u> Tax Refund Fraud and Related Identity Theft (03/30/2012)	✓			
<u>FIN-2012-G002</u> Filing FinCEN's New Currency Transaction Report and Suspicious Activity Report (03/29/2012).	✓			
<u>FIN-2012-A003</u> and <u>FIN-2012-A004</u> - FinCEN Advisories - Guidance to Financial Institutions Based on the Financial Action Task Force Public Statement on Anti-Money Laundering and Counter-Terrorist Financing Risks (03/06/2012)	✓			
<u>FIN-2012-A001</u> FinCEN Advisory - Foreign-Located Money Services Businesses (02/15/2012)	✓			
<u>FIN-2011-A016</u> FinCEN Advisory - Account Takeover Activity (12/19/2011)	✓			
Press Release - <u>FinCEN Issues Prepaid Access Final Rule</u> (07/26/2011)				✓
<u>FIN 2011-A009</u> – Information on Narcotics and Bulk Currency Corridors (04/21/2011)	✓			
Press Release - <u>FinCEN Releases Commercial Real Estate Fraud Analysis and Advisory</u> (03/30/2011)	✓			
Press Release – <u>FinCEN's Streamlined Regulations in New 31 CFR Chapter X Became Effective on March 1, 2011</u> (03/01/2011)	✓			
<u>Amendment to the Bank Secrecy Act Regulations – Reports of Foreign Financial Accounts</u> (02/24/2011)	✓			
<u>FIN 2011-A003</u> Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding Elder Financial Exploitation (2/22/2011)	✓			
<u>FIN 2010-G006</u> Sharing Suspicious Activity Reports by Depository Institutions with Certain U.S. Affiliates (11/23/2010)	✓			
<u>FIN-2010-A014</u> <u>Maintaining the Confidentiality of Suspicious Activity Reports</u> (11/23/2010)	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<i>News Release - FinCEN Rule Strengthens SAR Confidentiality; Provides Guidance to Permit Sharing with Affiliates (11/23/2010)</i>	✓			
<i>Guidance FIN-2010-G004 Funds "Travel" Regulations: Questions & Answers (11/09/2010)</i>	✓			
<i>Advisory 2010-A011 – Informal Value Transfer Systems (09/01/2010)</i>	✓			
<i>FIN-2010-A007 Newly Released Mexican Regulations Imposing Restrictions on Mexican Banks for Transactions in U.S. Currency (06/21/2010)</i>	✓			
<i>FIN-2010-A006 Updated Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding Loan Modification / Foreclosure Rescue Scams (06/17/2010)</i>	✓			
<i>Press Release: FinCEN Warns Lenders to Guard Against Home Equity Conversion Mortgage Fraud Schemes (04/27/2010)</i>	✓			
<i>FIN-2010-A005: Advisory to Financial Institutions Filing Suspicious Activity Reports Regarding Home Equity Conversion Mortgage Fraud Schemes (04/27/2010)</i>	✓			
<i>FIN-2010-A001 Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding Trade-Based Money Laundering (02/18/2010)</i>	✓			
<i>FIN-2010-G001 Guidance on Obtaining and Retaining Beneficial Ownership Information (03/05/2010)</i>	✓			
<i>FIN-2009-R003 Ruling on Customer Identification Rule – Address Confidentiality Programs(01/12/2010)</i>	✓			
<i>FIN-2009-A006 Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding TARP-related Programs (10/14/09)</i>	✓			
<i>FIN-2009-G003 Determining the Eligibility for Exemption from Currency Transaction Reporting Requirements (08/31/2009)</i>	✓			
<i>FIN-2009-R002 Ruling on Treatment of Deposits by Armored Cars for Currency Transaction Report (CTR) Purposes (07/02/2009)</i>	✓			
<i>FIN-2009-G002 Guidance on the Scope of Permissible Information Sharing Covered by Section 314(b) Safe Harbor of the USA PATRIOT Act (06/16/2009)</i>	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIN 2009-G001</u> <i>Guidance on Supporting Information Suitable for Determining the Portion of a Business Customer's Annual Gross Revenues that is Derived from Activities Ineligible for Exemption from Currency Transaction Reporting Requirements (04/12/2009)</i>	✓			
<u>FIN 2009-A001</u> <i>Guidance to Financial Institutions on Filing Suspicious Activity Reports regarding Loan Modification/Foreclosure Rescue Scams (04/06/2009)</i>	✓			
<u>News Release - FinCEN Announces Final Rule on Currency Transaction Exemption Reporting (12/04/2008)</u>	✓			
<u>Suspected Money Laundering in the Residential Real Estate Industry: An Assessment Based upon Suspicious Activity Report Filing Analysis (05/01/2008)</u>				✓
<u>FIN-2008-G005</u> <i>Filing Suspicious Activity Reports Regarding the Proceeds of Foreign Corruption (04/17/2008)</i>				✓
<u>FIN-2008-G002</u> <i>No Action Position to the CIP Rule for Broker-Dealers (03/04/2008)</i>				✓
<u>FIN-2008-G001</u> <i>Application of Correspondent Account Rules to the Presentation of Negotiable Instruments Received by a Covered Financial Institution for Payment (01/30/2008)</i>	✓			
<u>FIN-2007-G006</u> <i>Application of Definition of Money Services Business to Certain Owner-Operators of Automated Teller Machines Offering Limited Services (12/03/2007)</i>				✓
<u>Press Release – FinCEN Issues Final Rule for Section 312 of the USA PATRIOT Act – Enhanced Due Diligence for Correspondent Accounts Maintained by Certain Foreign Banks (08/08/2007)</u>	✓			
<u>FIN-2007-G003</u> <i>Suspicious Activity Report Supporting Documentation (06/13/2007)</i>	✓			
<u>FIN-2007-G002</u> <i>Requests by Law Enforcement for Financial Institutions to Maintain Accounts (06/13/2007)</i>	✓			
<u>FIN-2006-G015</u> – <i>Customer Identification Programs and Banks Serving as Insurance Agents (12/12/2006)</i>	✓			
<u>News Release – FinCEN Advises Financial Industry on Potential Risks of Shell Companies (11/09/2006)</u>	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>FIN-2006-G012</u> – <i>Conducting Independent Reviews of MSBs Anti-Money Laundering Programs (09/22/2006)</i>				✓
<u>FIN-2006-G007</u> – <i>Frequently Asked Questions – Customer Identification Program Responsibilities Under the Agency Lending Disclosure Initiative (04/25/2006)</i>	✓			
<u>FIN-2006-A003</u> – <i>Guidance to Financial Institutions on the Repatriation of Currency Smuggled into Mexico from the United States (04/28/2006)</i>	✓			
<u>FIN-2006-G005</u> <i>Frequently Asked Questions – Businesses Cashing Their Own Checks (03/31/2006)</i>	✓			
Guidance: <u>Registration and De-Registration of Money Services Businesses</u> (02/03/2006)				✓
<u>Final Regulation Implementing Section 312 of the USA PATRIOT Act</u> (12/21/2005)	✓			
Guidance (<u>Frequently Asked Questions</u>) <u>Concerning Completion of Part II of FinCEN Form 104, Currency Transaction Report</u> (8/12/2005)	✓			
<u>FinCEN’s Advisory</u> on <i>Guidance to Money Service Businesses on Obtaining and Maintaining Banking Services (4/26/2005)</i>				✓
<u>FinCEN Guidance 2004-02</u> – <i>Interpretation of Suspicious Activity Reporting Requirements to Permit the Unitary Filing of Suspicious Activity and Blocking Reports (12/2004)</i>	✓			
<u>FinCEN – Guidance (FAQs- Final CIP Rule)</u> on <i>Customer Identification Regulations (1/8/2004)</i>	✓			
Comptroller of the Currency Issuances				
<u>OCC Interpretive Letter 1174</u> <i>OCC Chief Counsel’s Interpretation on National Bank and Federal Savings Association Authority to Use Independent Node Verification Networks and Stablecoins for Payment Activities (1/4/2021)</i>				✓
<u>OCC Bulletin 2017-21</u> <i>Third Party Relationships – Frequently Asked Questions to Supplement OCC Bulletin 2013-29 (06/07/2017)</i>				✓
<u>OCC 2013-39</u> <i>Social Media: Consumer Compliance Risk Management Guidance (12/17/ 2013)</i>				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>OCC 2013-29</u> <i>Third Party Relationships: Risk Management Guidance (10/30/2013)</i>				✓
<u>OCC Bulletin 2011-27</u> <i>Prepaid Access Programs – Risk Management Guidance and Sound Practices (06/28/2011)</i>				✓
<u>OCC 2008-12</u> <i>Risk Management Guidance: Payment Processors (04/24/2008)</i>				✓
<u>OCC Bulletin 39-2006: Automated Clearing House Activities</u> (09/01/2006)				✓
Office of Foreign Asset Control (OFAC)				
<u>Financial Sanctions</u>	✓			
U.S. Treasury Issuances				
<u>Press Release</u> – <i>United States, Australia, and the United Kingdom Jointly Sanction Key Infrastructure that Enables Ransomware Attacks (2/11/25)</i>	✓			
<u>Press Release</u> – <i>Treasury Sanctions Company Associated with Salt Typhoon and Hacker Associated with Treasury Compromise (1/17/25)</i>	✓			
<u>Press Release</u> <i>Treasury Announces <u>2020 National Strategy For Combatting Terrorist and Other Illicit Financing</u> (2/6/2020)</i>	✓			
<u>Press Release</u> – <i>Treasury and State Announce New Humanitarian Mechanism to Increase Transparency of Permissible Trade Supporting the Iranian People (10/25/19)</i>	✓			
<u>Press Release</u> – <i>Joint Fact Sheet on Foreign Correspondent Banking (8/30/2016)</i>	✓			
<u>Press Release</u> : <i>Treasury Takes Actions to Further Restrict North Korea’s Access to the U.S. Financial System (6/1/2016)</i>	✓			
<u>Treasury Identifies Belarusian JSC CredexBank as an Institution of “Primary Money Laundering Concern”</u> (05/22/2012)	✓			
OTHER RELATED MATERIAL				
FRB Minneapolis - <u>BSA Independent Testing Compliance</u> (12/17)				✓

REFERENCE MATERIAL

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)

BSA/AML

CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<i>CSBS Marijuana Licensing Map (9/22/17)</i>				✓
<i>CSBS Marijuana-Related Business Job Aid (requires log in)</i>				✓
<i>CSBS Issues BSA/AML Assessment Tool (1/18/2017)</i>	✓			
<i>Money Laundering and Financial Crimes (March 2014) an <i>International Narcotics Control Strategy Report</i></i>				✓
<i>The Buck Stops Here: Improving U.S. Anti-Money Laundering Practices (Source: U.S. Senate) (April 2013)</i>				✓
<i>Basel Committee on Banking Supervision Paper - Due diligence and transparency regarding cover payment messages related to crossborder wire transfers (May 2009)</i>				✓
<i>Compliance Tips for MSBs and Other SAR Filers (10/10/2007)</i>				✓
<i>FATF Report on New Payment Methods (10/13/2006)</i>				✓
<i>The Misuse of Corporate Vehicles, Including Trust and Company Service Providers (10/2006)</i>				✓
<i>U.S. Money Laundering Threat Assessment (12/2005)</i>				✓
<i>Press Release-Treasury and Federal Financial Regulators Issue Final Patriot Act Regulations on Customer Identification (4/30/03)</i>	✓			
<i>Financial Action Task Force (FATF) on Money Laundering</i>	✓			
<i>Title III of HR 3162 USA Patriot Act</i>	✓			