



TEXAS DEPARTMENT OF BANKING

EXPANDED BSA/AML DOCUMENT REQUEST LIST

Insert name, city here

Please submit the electronic documents using the Department’s upgraded Data Exchange System (**DEX 2.0**) which is accessed from the [Entity Log In](#) page of the Department website.

Only those items marked with an “X” are requested for this examination.

#28 - BSA/ AML ADDITIONAL CORE EXAMINATION ITEMS				
X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	Training			
	28-A1: Training documentation (e.g., materials used for training since the previous BSA/AML examination).	Since Last Exam	Copy	
	Customer Identification Program			
	28-A2: File of correspondence requesting TINs for bank customers.	Most Recent	Access	
	28-A3: Written description of the bank’s rationale for Customer Identification Program (CIP) exemptions existing customers who open new accounts.	Most Recent	Copy	
	28-A4: List of any accounts opened where verification has not been completed or any accounts opened with exceptions to the CIP.	Most Recent	Copy	
	28-A5: List of customers or potential customers for whom the bank took adverse action, ¹ on the basis of its CIP.	Most Recent	Copy	
	28-A6: List of all documentary and nondocumentary methods the bank uses to verify a customer’s identity.	Most Recent	Copy	
	28-A7: Customer notices and a description of their timing and delivery, by product.	Most Recent	Copy	

¹ As defined by 12 CFR 202.2(c).

#28 - BSA/ AML ADDITIONAL CORE EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	<p>28-A8: List of the financial institutions on which the bank is relying, if the bank is using the “reliance provision.” The list should note if the relied-upon financial institutions are subject to a rule implementing the BSA/AML compliance program requirements of 31 USC 5318(h) and are regulated by a federal functional regulator.</p> <p>Provide the following:</p> <ul style="list-style-type: none"> • Copies of any contracts signed between the parties. • Copies of the CIP or procedures used by the other party. • Any certifications made by the other party. 	Most Recent	Copy	
	<p>28-A9: Copies of contracts with financial institutions and with third parties that perform all or any part of the bank’s CIP.</p>	Most Recent	Copy	
	Suspicious Activity Reporting			
	<p>28-A10: Determination of whether the bank uses a manual or an automated account monitoring system, or a combination of the two. If an automated system is used, determine whether the system is proprietary or vendor supplied. If the system was provided by an outside vendor, request (i) a list that includes the vendor, (ii) application names, and (iii) installation dates of any automated account monitoring system provided by an outside vendor. A list of the algorithms or rules used by the systems and copies of the independent validation of the software against these rules.</p>	Most Recent	Access	
	<p>28-A11: Reports used for identification of and monitoring for suspicious transactions. These reports include, but are not limited to, suspected kiting reports, cash activity reports, monetary instrument records, and funds transfer reports. These reports can be generated from specialized BSA/AML software, the bank’s general data processing systems, or both.</p> <p>If not already provided, copies of other reports that can pinpoint unusual transactions warranting further review. Examples include NSF reports, account analysis fee income reports, and large item reports.</p> <p>Provide name, purpose, parameters, and frequency of each report.</p>	Most Recent	Copy	

#28 - BSA/ AML ADDITIONAL CORE EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-A12: Policies, procedures, and processes used to comply with all criminal subpoenas, including national security letters (NSLs), related to BSA.	Most Recent	Access	
	Currency Transaction Reporting			
	28-A13: List of products or services that may involve currency transactions.	Most Recent	Copy	
	Currency Transaction Reporting Exemptions			
	28-A14: Filed Designation of Exempt Person form(s) for current exemptions (FinCEN Form 110).	Since Last Exam	Access	
	28-A15: Documentation to support the exemption (e.g., currency transaction history).	Most Recent	Copy	
	28-A16: Documentation of required annual reviews for CTR exemptions.	Most Recent	Access	
	Information Sharing			
	28-A17: Vendor confidentiality agreements regarding section 314(a) services, if applicable.	Most Recent	Access	
	28-A18: Policies, procedures, and processes for complying with 31 CFR 1010.520 (Information Sharing Between Government Agencies and Financial Institutions)	Most Recent	Copy	
	28-A19: If applicable, policies, procedures, and processes for complying with 31 CFR 1010.540.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
Foreign Correspondent Account Recordkeeping and Due Diligence				
	28-A20: List of all foreign correspondent bank accounts, including a list of foreign financial institution, for which the bank provides or provided regular services, and the date on which the required information was received (either by completion of a certification or by other means).	Most Recent	Copy	
	28-A21: If applicable, documentation to evidence compliance with 31 CFR 1010.630 (Prohibition on Correspondent Accounts for Foreign Shell Banks; Records Concerning Owners of Foreign Banks and Agents for Service of Legal Process) and 1010.670 (Summons or Subpoena of Foreign Bank Records; Termination of Correspondent Relationship) (for foreign correspondent bank accounts and shell banks).	Most Recent	Access	
	28-A22: List of all payable through relationships with foreign financial institutions as defined in 31 CFR 1010.610.	Most Recent	Copy	
	28-A23: Contracts or agreements with foreign financial institutions that have payable through accounts.	Most Recent	Access	
	28-A24: List of the bank's foreign branches and the steps the bank has taken to determine that its accounts with its branches are not used to indirectly provide services to foreign shell banks.	Most Recent	Copy	
	28-A25: List of all foreign correspondent bank accounts and relationships with foreign financial institutions that have been closed or terminated in compliance with the conditions in 31 CFR 11010.630 (i.e., service to foreign shell banks, records of owners and agents).	Since Last Exam	Copy	
	28-A26: List of foreign correspondent bank accounts that have been the subject of a 31 CFR 1010.520 (Information Sharing Between Government Agencies and Financial Institutions) or any other information request from a federal law enforcement officer for information regarding foreign correspondent bank accounts and evidence of compliance.	Since Last Exam	Copy	
	28-A27: Any notice to close foreign correspondent bank accounts from the Secretary of the Treasury or the U.S. Attorney General and evidence of compliance.	Since Last Exam	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-A28: Policies, procedures, and processes for complying with 31 CFR 1010.630.	Most Recent	Copy	
	28-A29: List of all the bank's embassy or consulate accounts, or other accounts maintained by a foreign government, foreign embassy, or foreign political figure.	Most Recent	Copy	
	28-A30: List of all accountholders and borrowers domiciled outside the United States, including those with U.S. power of attorney.	Most Recent	Copy	
	Currency Shipment Activity			
	28-A31: Records reflecting currency shipped to and received from the Federal Reserve Bank or correspondent banks, or reflecting currency shipped between branches and their banks' central currency vaults.	Previous 3 Months	Access	
	Other BSA Reporting and Recordkeeping Requirements			
	28-A32: Record retention schedule and procedural guidelines.	Most Recent	Copy	
	28-A33: File of Reports of International Transportation of Currency or Monetary Instruments (CMIR) (FinCEN Form 105, formerly Customs Form 4790).	Most Recent	Access	
	28-A34: Records of Report of Foreign Bank and Financial Accounts (FBARs) (TD F 90-22.1).	Most Recent	Access	
	OFAC			
	28-A35: Results of any internally or externally sourced independent audits or tests performed since the previous examination for OFAC, including the scope or engagement letter, management's responses, and access to the work papers.	Most Recent	Copy	
	28-A36: List of blocked or rejected transactions with individuals or entities on the OFAC list and reported to OFAC.	Most Recent	Access	
	28-A37: If maintained, make available logs or other documentation related to reviewing potential OFAC matches, including the method for reviewing and clearing those determined not to be matches.	Most Recent	Access	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-A38: Provide a list of any OFAC licenses issued to the bank.	Most Recent	Copy	
	28-A39: Provide a copy of the Annual Report of Blocked Property submitted to OFAC (TD F 90-22.50).	Most Recent	Copy	
	Correspondent Accounts (Domestic)			
	28-AA1: Policies, procedures, and processes specifically for correspondent bank accounts, including procedures for monitoring for suspicious activity.	Most Recent	Copy	
	28-AA2: List of domestic correspondent bank accounts.	Most Recent	Copy	
	28-AA3: List of SARs filed relating to domestic correspondent bank accounts.	Since Last Exam	Copy	
	Correspondent Accounts (Foreign)			
	28-BB1: Policies, procedures, and processes specifically for foreign correspondent financial institution accounts, including procedures for monitoring for suspicious activity.	Most Recent	Copy	
	28-BB2: List of foreign correspondent financial institution accounts.	Most Recent	Copy	
	28-BB3: Risk assessments covering foreign correspondent financial institution account relationships.	Most Recent	Copy	
	28-BB4: List of SARs filed relating to foreign correspondent financial institution accounts.	Since Last Exam	Copy	
	U.S. Dollar Drafts			
	28-CC1: Policies, procedures, and processes specifically for U.S. dollar drafts, including procedures for monitoring for suspicious activity.	Most Recent	Copy	
	28-CC2: List of foreign correspondent bank accounts that offer U.S. dollar drafts. If possible, include the volume, by number and dollar amount, of monthly transactions for each account.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-CC3: List of SARs filed relating to U.S. dollar drafts.	Since Last Exam	Copy	
	Payable Through Accounts			
	28-DD1: Policies, procedures, and processes specifically for payable through accounts (PTAs), including procedures for monitoring for suspicious activity.	Most Recent	Copy	
	28-DD2: List of foreign correspondent bank accounts with PTAs. Include a detailed summary (number and monthly dollar volume) of sub-account holders for each PTA.	Most Recent	Copy	
	28-DD3: List of SARs filed relating to PTAs.	Since Last Exam	Copy	
	Pouch Activities			
	28-EE1: Pouch activity policies, procedures, and processes, including procedures for monitoring for suspicious activity.	Most Recent	Copy	
	28-EE2: List of customer accounts permitted to use pouch services.	Most Recent	Copy	
	28-EE3: List of CTRs, CMIRs, or SARs filed relating to pouch activity.	Since Last Exam	Copy	
	28-EE4: As needed, a copy of pouch logs.	Since Last Exam	Access	
	Foreign Branches and Offices of U.S. Banks			
	28-FF1: Policies, procedures, and processes specific to the foreign branch or office, if different from the parent's policies, procedures, and processes.	Most Recent	Copy	
	28-FF2: Management reports received on foreign branches and offices.	Most Recent	Copy	
	28-FF3: Bank's tiering or organizational structure report.	Most Recent	Copy	
	28-FF4: AML audit reports, compliance reports, and supporting documentation for the foreign branches and offices.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-FF5: List of the types of products and services offered at the foreign branches and offices and information on new products or services offered by the foreign branch, including those that are not already offered by the parent bank.	Most Recent	Copy	
	28-FF6: A description of the method for aggregating each customer relationship across business units and geographic locations throughout the organization.	Most Recent	Copy	
	28-FF7: Code of ethics for foreign branches or offices, if it is different from the bank's standard policy.	Most Recent	Copy	
	28-FF8: A list of accounts originated or serviced in the foreign branch or office. Examiners should include this when testing will be performed. Examiners should try to limit this request and focus on accounts for specific products or services, high-risk accounts only, or accounts for which exceptions or audit concerns have been noted.	Most Recent	Copy	
	28-FF9: List of the locations of foreign branches and offices, including, if possible, the host country regulatory agency and contact information.	Most Recent	Copy	
	28-FF10: Organizational structure of the foreign branches and offices, including reporting lines to the U.S. bank level.	Most Recent	Copy	
	Parallel Banking			
	28-GG1: List any parallel banking relationships.	Most Recent	Copy	
	28-GG2: Policies, procedures, and processes specifically for parallel banking relationships, including procedures relating to high-risk money laundering activities. Such policies and procedures should include those that are specific to the relationship with the parallel entity.	Most Recent	Copy	
	28-GG3: List of SARs filed relating to parallel banking relationships	Since Last Exam	Copy	
	28-GG4: Documents that specify limits or procedures that should be followed when dealing with the parallel entity.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-GG5: List of directors or officers of the bank who are also associated with the foreign parallel bank.	Most Recent	Copy	
	Electronic Banking			
	28-HH1: Policies and procedures related directly to electronic banking (e-banking) that are not already included in the BSA/AML policies.	Most Recent	Copy	
	28-HH2: Management reports that indicate the monthly volume of e-banking activity.	Since Last Exam	Access	
	28-HH3: List of business customers regularly conducting e-banking transactions, including the number and dollar volume of transactions.	Most Recent	Copy	
	28-HH4: List of service providers related to Remote Deposit Capture (RDC) activities	Most Recent	Copy	
	28-HH5: Copies of contracts related to RDC activities.	Most Recent	Copy	
	Funds Transfers			
	28-II1: Funds transfer activity logs, including transfers into and out of the bank. Include the number and dollar volume of wire transfer activity for the month.	Most Recent	Access	
	28-II2: List of funds transfers purchased with currency.	Previous xx Months	Copy	
	28-II3: List of noncustomer transactions.	Previous xx Months		
	28-II4: If not already included in the BSA/AML policies, make available copies of any policies, procedures, and processes related to funds transfers or payable upon proper identification (PUPID)	Most Recent	Copy	
	28-II5: List of suspense accounts used for PUPID proceeds.	Most Recent	Copy	
	28-II6: List of PUPID transactions completed by the bank, either as the beneficiary bank or as the originating bank.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	Automated Clearing House Transactions			
	28-JJ1: Policies and procedures related directly to automated clearing house (ACH) transactions and international ACH transactions (IAT) that are not already included in the BSA/AML policies.	Most Recent	Copy	
	28-JJ2: Management reports that indicate the monthly volume of ACH activity, including IATs.	Since Last Exam	Access	
	28-JJ3: List of large or frequent ACH transactions or IATs.	Since Last Exam	Access	
	28-JJ4: List of customer complaints regarding ACH transactions and IATs.	Since Last Exam	Copy	
	Electronic Cash			
	28-KK1: Policies and procedures related directly to electronic cash (e-cash) that are not already included in the BSA/AML policies.	Most Recent	Copy	
	28-KK2: Management reports that indicate the monthly volume of e-cash activity.	Since Last Exam	Access	
	28-KK3: A list of business customers regularly conducting e-cash transactions, including the number and dollar volume of transactions.	Most Recent	Copy	
	Third-Party Payment Processors			
	28-LL1: If not already included in the BSA/AML policies, make available copies of any policies, procedures, and processes related to third-party payment processors.	Most Recent	Copy	
	28-LL2: A list of third-party payment processor relationships. Include the number and dollar volume of payments processed per relationship.	Most Recent	Copy	
	28-LL3: List of SARs filed on third-party payment processor relationships.	Since Last Exam	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	Purchase and Sale of Monetary Instruments			
	28-MM1: Policies, procedures, and processes related to the sale of monetary instruments for currency, if not already included in the BSA/AML policies. In particular, include policies, procedures, and processes related to the monitoring sales of monetary instruments in order to detect unusual activities.	Most Recent	Copy	
	28-MM2: Monetary instrument logs or other management information systems reports used for the monitoring and detection of unusual or suspicious activities relating to the sales of monetary instruments.	Since Last Exam	Access	
	28-MM3: List of noncustomer transactions.	Previous 3 Months	Copy	
	28-MM4: List of monetary instruments purchased with currency.	Previous 3 Months	Copy	
	28-MM5: List of SARs filed related to the purchase or sale of monetary instruments.	Since Last Exam	Copy	
	Brokered Deposits			
	28-NN1: Policies and procedures specifically for brokered deposit, including procedures for monitoring for suspicious activity.	Most Recent	Copy	
	28-NN2: Risk assessment covering brokered deposits.	Most Recent	Copy	
	28-NN3: Internal audits covering brokered deposits.	Most Recent	Access	
	28-NN4: List of approved deposit brokers	Most Recent	Copy	
	28-NN5: Management reports covering nonrelationship funding programs (including reports on balances, concentrations, performance, or fees paid).	Most Recent	Access	
	28-NN6: SARs and subpoenas related to brokered deposit relationships.	Since Last Exam	Access	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-NN7: Account documentation or agreements for deposit broker arrangements.	Most Recent	Copy	
	Privately-Owned Automated Teller Machines			
	28-OO1: Risk assessment covering privately-owned automated teller machines (ATMs) and Independent Sales Organizations (ISOs), including a list of high-risk privately-owned ATM relationships.	Most Recent	Copy	
	28-OO2: Policies, procedures, and processes for privately-owned ATM and ISO account acceptance, due diligence, and ongoing monitoring.	Most Recent	Copy	
	28-OO3: List of ISO clients and balances.	Most Recent	Copy	
	28-OO4: SARs and subpoenas related to privately-owned ATMs and ISOs.	Since Last Exam	Access	
	Nondeposit Investment Products			
	28-PP1: Policies, procedures, and processes relating to nondeposit investment products (NDIPs) and relationships with any independent NDIP providers.	Most Recent	Copy	
	28-PP2: Internal audits covering NDIP sales and provider relationships.	Since Last Exam	Access	
	28-PP3: Risk assessment covering NDIP customers and transactions.	Most Recent	Access	
	28-PP4: If available, list of NDIP clients and balances.	Most Recent	Copy	
	28-PP5: List of suspense, concentration, or omnibus accounts used for NDIP. Describe the purpose for and controls surrounding each account.	Most Recent	Copy	
	28-PP6: Management reports covering 25 to 50 of the largest, most active, and most profitable NDIP customers.	Most Recent	Access	
	28-PP7: SARs and subpoenas related to NDIP customers.	Since Last Exam	Access	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-PP8: Account opening documentation or agreements for NDIP.	Most Recent	Copy	
	28-PP9: Contracts or agreements between the bank and third-party NDIP providers for the completion of CIP, due diligence, and ongoing monitoring of NDIP customers.	Most Recent	Copy	
	Insurance			
	28-QQ1: BSA/AML policies and procedures related to the sale of insurance.	Most Recent	Copy	
	28-QQ2: Risk assessment covering insurance products.	Most Recent	Copy	
	28-QQ3: Management information systems reports related to the sales of insurance products. Reports may include large transaction reports, single premium payments, early cancellation, premium overpayments, and assignments of claims.	Most Recent	Access	
	28-QQ4: Contracts or agreements between the bank and insurance providers for the completion of CIP, due diligence, and ongoing monitoring of insurance customers.	Most Recent	Copy	
	28-QQ5: List of insurance products approved for sale at the bank.	Most Recent	Copy	
	28-QQ6: Management reports covering insurance products (including large transactions, funds transfers, single premium payments, early cancellations).	Most Recent	Access	
	28-QQ7: SARs or subpoenas related to insurance clients.	Since Last Exam	Access	
	28-QQ8: Account documentation requirements and applications for insurance products.	Most Recent	Copy	
	Concentration Accounts			
	28-RR1: BSA/AML policies, procedures, and processes that are specific to concentration accounts (also known as special-use, omnibus, suspense, settlement, intraday, sweep, or collection accounts).	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-RR2: List of all concentration accounts and each account's most recent reconciliation	Most Recent	Copy	
	28-RR3: Account activity reports for concentration accounts.	Previous xx Months	Access	
	Lending Activities			
	28-SS1: BSA/AML policies and procedures specific to lending.	Most Recent	Copy	
	28-SS2: Risk assessment relating to the lending function, including a list of any high-risk lending relationships identified by the bank.	Most Recent	Copy	
	28-SS3: For loans secured by cash collateral, marketable securities, or cash surrender value of life insurance products: <ul style="list-style-type: none"> • A list of all loans that have defaulted since the previous BSA/AML examination, including those that were charged off. • A list of all loans that have been extended since the previous BSA/AML examination. 	Since Last Exam	Copy	
	Trade Finance Activities			
	28-TT1: BSA/AML policies and procedures specific to trade finance activities.	Most Recent	Copy	
	28-TT2: Risk assessment relating to trade finance activities, including a list of any high-risk trade finance transactions, accounts, or relationships identified by the bank.	Most Recent	Copy	
	28-TT3: List of customers involved in transactions with high-risk geographic locations or for whom the bank facilitates trade finance activities with high-risk geographic locations.	Most Recent	Copy	
	Private Banking			
	28-UU1: Policies, procedures, and controls used to manage BSA/AML risks in the private banking department.	Most Recent	Copy	
	28-UU2: Business or strategic plans for the private banking department.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-UU3: Management reports on private banking activity, such as customer aggregation reports, policy exception reports, client concentrations, customer risk classification reports, and unusual account activity.	Most Recent	Access	
	28-UU4: Private banking reports from compliance, internal audit, risk management, and external auditors or consultants that cover BSA/AML.	Most Recent	Copy	
	28-UU5: List of products and services offered to private banking clients. Information on new products and services offered to private banking clients and the bank's process for approving new activities.	Most Recent	Copy	
	28-UU6: A description of the method for aggregating customer holdings and activities across business units throughout the organization.	Most Recent	Copy	
	28-UU7: A description of account officer and manager positions, and the compensation, recruitment, and training program for these positions.	Most Recent	Copy	
	28-UU8: Code of ethics policy for private banking officers.	Most Recent	Copy	
	28-UU9: Risk assessment covering private banking customers and transactions.	Most Recent	Copy	
	28-UU10: List of suspense, concentration, or omnibus accounts used for private banking transactions. Describe the purpose for each account and the controls governing it.	Most Recent	Copy	
	28-UU11: Management reports covering 25 to 50 of the largest, most active, or most profitable private banking customers.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	<p>28-UU12: A list of the bank’s private banking accountholders who meet the following criteria:</p> <ul style="list-style-type: none"> • Politically exposed persons (PEPs), export/import business owners, money transmitters, Private Investment Companies (PICs), financial advisers, offshore entities, or money managers (when an intermediary is acting on behalf of customers). • Customers who were introduced to the bank by individuals previously employed by other financial institutions. • Customers who were introduced to the bank by a third-party investment adviser. • Customers who use nominee names. • Customers who are from, or do business with, a high-risk geographic location. • Customers who are involved in cash-intensive businesses. • Customers who were granted exceptions to policies, procedures, and controls have occurred. • Customers who frequently appear on unusual activity monitoring reports. 	Most Recent	Copy	
	28-UU13: SARs and subpoenas related to private banking customers.	Since Last Exam	Access	
	28-UU14: Account-opening documentation or agreements for private banking customers.	Most Recent	Copy	
	Trust and Asset Management Services			
	28-VV1: BSA/AML policies, procedures, and processes for trust and asset management services.	Most Recent	Copy	
	28-VV2: Trust and asset management procedures and guidelines used to determine when enhanced due diligence is appropriate for higher-risk accounts and parties to the relationship. These should include methods for identifying account-interested parties (i.e., individual grantors, co-trustees, or outside investment managers).	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	<p>28-VV3: A list of the bank’s trust and asset management accountholders who meet the following criteria:</p> <ul style="list-style-type: none"> • Politically exposed persons (PEPs), export/import business owners, money transmitters, Private Investment Companies (PICs), financial advisers, offshore entities, or money managers (when an intermediary is acting on behalf of customers). • Customers who were introduced to the bank by individuals previously employed by other financial institutions. • Customers who were introduced to the bank by a third-party investment adviser. • Customers who use nominee names. • Customers who are from, or do business with, a high-risk geographic location. • Customers who are involved in cash-intensive businesses. • Customers who were granted exceptions to policies, procedures, and controls have occurred. • Customers who frequently appear on unusual activity monitoring reports. 	Most Recent	Copy	
	<p>28-VV4: Reports and minutes submitted to the board of directors or its designated committee relating to BSA/AML matters pertaining to trust and asset management business lines and activities.</p>	Since Last Exam	Access	
	<p>28-VV5: An organizational chart for the BSA/AML compliance function as it relates to the trust and asset management services</p>	Most Recent	Copy	
	<p>28-VV6: A risk assessment of trust and asset management services that identifies those customers, prospective customers, or products the bank has determined to be high risk.</p>	Most Recent	Copy	
	<p>28-VV7: Management reports covering 25 to 50 of the largest, most active, or most profitable trust and asset management customers.</p>	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-VV8: BSA/AML independent review or audit of trust and asset management services. Make workpapers available upon request	Since Last Exam	Access	
	28-VV9: BSA/AML training materials for management and employees involved in trust and asset management activities.	Most Recent	Access	
	28-VV10: Identify the trust accounting systems used. Briefly explain how they accommodate and assist compliance with BSA/AML regulations and guidelines.	Most Recent	Copy	
	28-VV11: List of newly opened trust and asset management accounts.	Previous xx Months	Copy	
	28-VV12: Procedures for checking section 314(a) requests relating to trust and asset management services.	Most Recent	Copy	
	28-VV13: List of all trust and asset management accounts designated as high-risk, and a list of all accounts whose assets consist of PICs and asset protection trusts.	Most Recent	Copy	
	28-VV14: SARs associated with trust and asset management services.	Since Last Exam	Access	
	28-VV15: List of subpoenas, particularly BSA/AML-related, relating to trust and asset management activities.	Since Last Exam	Access	
	Nonresident Aliens and Foreign Individuals			
	28-WW1: Policies, procedures, and processes specific to nonresident alien (NRA) accounts, including guidelines and systems for establishing and updating W-8 exempt status.	Most Recent	Copy	
	28-WW2: A list of NRA and foreign individual accounts held by the bank, particularly those accounts the bank has designated as high risk.	Most Recent	Copy	
	28-WW3: A list of NRA and foreign individual accounts without a TIN, passport number, or other appropriate identification number.	Most Recent	Copy	
	28-WW4: A list of SARs and subpoenas related to NRA and foreign individual accounts	Since Last Exam	Access	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	Politically Exposed Persons			
	28-XX1: Policies, procedures, and processes specific to politically exposed persons (PEPs). Policies should include the bank's definition of a PEP as well as procedures for opening PEP accounts and senior management's role in the approval process for opening PEP accounts	Most Recent	Copy	
	28-XX2: List of accounts in the name of or for the benefit of a PEP. List should include the country of residence of the PEP, the account balances, and the average number and dollar volume of transactions per month.	Most Recent	Copy	
	28-XX3: List of the information systems or other methods used to identify PEP accounts.	Most Recent	Copy	
	28-XX4: Management reports used to monitor PEP accounts, including reports for identifying unusual and suspicious activity.	Most Recent	Copy	
	Embassy and Foreign Consulate Accounts			
	28-YY1: Policies, procedures, and processes specific to embassy and foreign consulate account relationships.	Most Recent	Copy	
	28-YY2: List of embassy and foreign consulate accounts held by the bank, including the average account balances and the average number and dollar volume of transactions per month.	Most Recent	Copy	
	28-YY3: List of accounts that are in the name of individuals who work for the embassy or foreign consulate	Most Recent	Copy	
	Non-Bank Financial Institutions			
	28-ZZ1: Policies, procedures, and processes related to non-bank financial institutions.	Most Recent	Copy	
	28-ZZ2: A list of non-bank financial institution accounts, including all related accounts.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28-ZZ3: A risk assessment of non-bank financial institution accounts, identifying those accounts the bank has designated as high risk. This list should include products and services offered by the non-bank financial institution; the average account balance; and the average number, type, and dollar volume of transactions per month.	Most Recent	Copy	
	28-ZZ4: A list of foreign non-bank financial institution accounts, including the products and services offered; the average account balance; and the average, number, type, and dollar volume of transactions per month.	Most Recent	Copy	
	28-ZZ5: A sample of account opening documentation for high-risk non-bank financial institutions.	Most Recent	Copy	
	28-ZZ6: A list of SARs and subpoenas related to non-bank financial institutions.	Since Last Exam	Access	
	Professional Service Providers			
	28-AAA1: Policies, procedures, and processes related to professional service provider accounts.	Most Recent	Copy	
	28-AAA2: List of professional service provider accounts, including all related accounts (such as interest on lawyers' trust accounts (IOLTA) which should include the name of the attorney on each account).	Most Recent	Copy	
	28-AAA3: List of any professional service provider accounts that the bank has designated as high risk.	Most Recent	Copy	
	Non-Governmental Organizations and Charities			
	28-BBB1: Policies, procedures, and processes related to non-governmental organizations and charities.	Most Recent	Copy	
	28-BBB2: List of non-governmental organizations and charities, particularly those that the bank the bank has designated as high risk. This list should include average account balances and the average number and dollar volume of transactions.	Most Recent	Copy	
	28-BBB3: List of non-governmental organizations involved in high-risk geographic locations.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	Business Entities (Domestic and Foreign)			
	28-CCC1: Policies, procedures, and processes specifically related to domestic and international corporate entities.	Most Recent	Copy	
	28-CCC2: List of accounts opened by corporate entities. If this list is unreasonably long, amend the request to look at those entities incorporated in high-risk jurisdictions or those accounts the bank has designated as high risk.	Most Recent	Copy	
	28-CCC3: List of loans to corporate entities collateralized by bearer shares.	Most Recent	Copy	
	Cash-Intensive Businesses			
	28-DDD1: Policies, procedures, and processes related to other businesses and entities.	Most Recent	Copy	
	28-DDD2: Risk assessment of other businesses and entities, list those other businesses and entities that the bank has designated as high risk. The listing should include average account balances and the average number and dollar volume of transactions.	Most Recent	Copy	
	Bulk Shipments of Currency			
	28-EEE1: Policies, procedures, and processes related to receiving shipments of bulk currency. Provide a description of expanded monitoring procedures applied to Currency Originators and Intermediaries.	Most Recent	Copy	
	28-EEE2: List of Currency Originators, Intermediaries, including referral agents, and foreign and domestic customers that send bulk currency shipments to the bank.	Most Recent	Copy	
	28-EEE3: List of all foreign and domestic correspondent bank accounts, including a list of foreign financial institutions, from which the bank received or sends bulk currency shipments.	Most Recent	Copy	
	28-EEE4: Risk assessment of relationships and transactions of Currency Originators and Intermediaries.	Most Recent	Copy	

#28- BSA/AML EXPANDED EXAMINATION ITEMS

X	ITEM	AS OF	COPY OR ACCESS	BANK CONTACT PERSON
	28 EEE5: Reports used for identification of and monitoring for suspicious transactions related to Currency Originators and Intermediaries.	Most Recent	Copy	
	28 EEE6: Agreements or contracts with Currency Originators or Intermediaries.	Most Recent	Copy	
	28 EEE7: List of SARS filed related to shipping relationships and transactions.	Since Last Exam	Copy	