

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 (TFC Chapters 181-199)		
<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><i>Chapter 21, Subchapter E - Shareholder Rights and Restrictions: Sections 21.201 - 21.226</i></p> <p><i>Chapter 21, Subchapter H - Shareholders' Meetings; Notice to Shareholders; Voting; and Quorum</i></p> <p><i>§21.351 Annual Meeting</i></p> <p><i>§21.358 - Quorum</i></p> <p>Texas Administrative Code</p> <p><i>7 TAC §3.22 - Sale or Lease Agreements with an Officer, Director, or Principal Shareholder of the Bank or of an Affiliate of the Banks</i></p> <p><i>7 TAC §17.3 Sale or Lease Agreements with an Officer, Director, Principal Shareholder, or Affiliate</i></p> <p><i>7 TAC §17.4 Bonding Requirements</i></p> <p><i>7 TAC §21.9 Corporate Filings</i></p> <p>FDIC Laws and Regulations</p>	<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p><i>Industry Notice 2022-2: Director, Manager, Managing Participant Affidavit – Oath of Office (3/2022)</i></p> <p><i>SM 1001 – Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</i></p> <p><i>SM 1002 - Trust Company Rating Systems</i></p> <p><i>SM 1009 - Strategic Planning</i></p> <p>FDIC Issuances</p>	<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	

TRUST REFERENCE MATERIAL

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

#2 –FIDUCIARY & CORPORATE MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i>FDIC Trust Examination Manual - Statement of Principles of Trust Department Management</i> Federal Reserve Issuances <i>Press Release - Agencies Issue Guide to Assist Community Banks to Develop and Implement Third-Party Risk Management Practices (5/3/24)</i> FFIEC Issuances Comptroller of the Currency Issuances	✓	✓
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED 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> - <i>Record Keeping and Confirmation Requirements for Securities Transactions</i></p> <p><u>17 CFR Commodity and Securities Exchanges</u></p> <p><u>Section 240.17Ad-2(b)</u> - <i>Securities Processing</i></p> <p><u>Section 240.17Ad-4(b)(1)</u> – <i>Exempt (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><i>Section <u>74.101</u> - Property Report</i></p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum and Issuances</p> <p><u>Industry Notice 2017-11</u> <i>Designation of Representative for Notice of an Abandoned Asset (10/12/2017)</i></p> <p><u>SM 1001</u> - <i>Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</i></p> <p><u>SM 1002</u> - <i>Trust Company Rating Systems</i></p> <p>FDIC Issuances</p> <p><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		
<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)

#4–FIDUCIARY & CORPORATE EARNINGS

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

TRUST REFERENCE MATERIAL

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

#4–FIDUCIARY & CORPORATE EARNINGS

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i>ASU 2018-02-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. See ASC – 740 Income Taxes</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		
<u>12 CFR 9.18</u> – Collective Investment Funds	✓	
<u>12 CFR Part 344</u> – Record Keeping and Confirmation Requirements for Securities Transactions	✓	
<u>12 CFR 208.34(g)(4)</u> – Securities Trading Policies and Procedures	✓	
<u>12 CFR Part 218</u> – Regulation R		
Internal Revenue Code		
<u>Section 584(b)</u> Taxation of Common Trust Funds	✓	
Securities and Exchange Act		
<u>Section 28(e)(3) (15 USC Section 78bb (e)(3))</u>	✓	
<u>Rule 10b-5 (17 CFR Section 240.10b-5)</u>	✓	
<u>Texas Finance Code</u>	✓	
Texas Trust Company Act		
<u>181.002(a)(7)</u> - "Capital" Definition	✓	
<u>(8)</u> - "Certified Surplus"	✓	
<u>182.101</u> - Amendment or Restatement of State Trust Company Certificate of Formation	✓	
<u>182.103</u> - Change in Restricted Capital	✓	
<u>182.104</u> - Capital Notes or Debentures	✓	
<u>183.001</u> - Acquisition of Control	✓	
<u>184.102</u> - Transactions in State Trust Company Shares or Participation Shares	✓	
<u>184.301</u> - Trust Deposits	✓	

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
<p><u>Texas Property Code (Title 9. Trusts)</u></p> <p><i><u>Chapter 117</u> - Uniform Prudent Investor Act</i></p> <p><i><u>Section 113.055</u> - Purchase of Trustee's Securities</i></p> <p><i><u>Section 113.056</u> - Authorization to Make Certain Investments</i></p> <p><i><u>Section 113.057</u> - Deposits by Corporate Trustee with Itself</i></p>	<p>✓</p> <p>✓</p> <p>✓</p>	
POLICY ISSUANCES		
<p>Department Policy Memorandum</p> <p><i><u>SM 1001</u> - Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations</i></p> <p><i><u>SM 1002</u> - Trust Company Rating Systems</i></p> <p>FDIC Issuances</p> <p><i><u>FIL-8-2014</u> Paying Agent Notification Requirements (2/7/2014)</i></p> <p><i><u>FIL-6-2014</u> Registration of Municipal Advisors – Final Rule (1/31/2014)</i></p> <p><i><u>FIL-89-2008</u> Securities Activities of Banks – Exceptions and Exemptions for Banks from the Definition of “Broker” (09/10/2008)</i></p>	<p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p>	
<p>Federal Reserve Issuances</p> <p><i>FRB Regulation R Guidance: <u>Exceptions for Banks from the Definition of Broker in the Securities Exchange Act of 1934 – A Small Entity Compliance Guide</u> (8/2008)</i></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
FFIEC Issuances <i>Uniform Interagency Trust Rating System</i>	✓	
Comptroller of the Currency Issuances		
GENERALLY ACCEPTED ACCOUNTING PRINCIPLES		
OTHER RELATED MATERIAL		

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

#5 –COMPLIANCE

General, Personal Trust, Employee Benefit, and Corporate Trust

Texas Department of Banking

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
<p>Tax Equity and Fiscal Responsibility Act of 1982</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><i>Section 74.101 - Property Report</i></p> <p><i>Section 113.057 - Deposits by Corporate Trustee with Itself</i></p> <p><i>Chapter 117 - Texas Uniform Prudent Investor Act</i></p> <p>Trust Indenture Act of 1939</p>	<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</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> <p><u>Retirement Plan Products and Services: Comptroller's Handbook Revisions and Rescissions</u> (2/2014)</p>		✓
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
<i>Internal Revenue Ruling 59-60 Asset Valuations</i>	✓	
<i>Department of Labor Opinion Letter 10.422</i>	✓	
<i>Department of Labor Prohibited Transaction Exemption 93-1</i>	✓	

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
#5 –COMPLIANCE
General, Personal Trust, Employee Benefit, and Corporate Trust

Texas Department of Banking

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>12 CFR 9.18(b)(1)</u> <i>Written Plan</i>	✓	
<u>Internal Revenue Code</u> (26 USC)		
<u>26 USC Section 501(a)</u> - <i>Exemption From Tax on Corporations, Certain Trusts, etc.</i>	✓	
<u>26 USC Section 584</u> - <i>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)</u> <i>Exemption From Registrations</i>	✓	
TEXAS STATUTES		
<u>Texas Property Code</u>		
<u>Chapter 117 - Texas Uniform Prudent Investor Act</u>		
<u>Chapter 116 - Texas Uniform Principal & Income Act</u>		
<u>Section 113.053</u> - <i>Purchase or Sale of Trust Property by Trustee</i>	✓	
<u>Section 113.055</u> - <i>Purchase of Trustee's Securities</i>	✓	
<u>Section 113.056</u> – <i>Authorization to Make Certain Investments</i>	✓	
<u>Section 113.057</u> - <i>Deposits by Corporate Trustee with Itself</i>	✓	

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 <u>SM 1001</u> – Rating Systems for Commercial Banks, Trust Departments, Foreign Bank Agencies, and Electronic Data Processing Operations <u>SM 1002</u> – Trust Company Rating Systems FDIC Issuances <u>Trust Examination Manual</u> <u>Section 3 – Asset Management – Part I: Investment Principles, Policies, and Products</u> Federal Reserve Issuances FFIEC Issuances <u>Uniform Interagency Trust Rating System</u> Comptroller of the Currency Issuances	✓ ✓ ✓ ✓	

TRUST REFERENCE MATERIAL

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

#6—FIDUCIARY ASSET MANAGEMENT

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<p><i>Comptroller's Handbook:</i></p> <ul style="list-style-type: none"> ▪ <u>Asset Management</u> ▪ <u>Asset Management Operations and Controls</u> ▪ <u>Collective Investment Funds</u> ▪ <u>Conflicts of Interest</u> ▪ <u>Custody Services</u> ▪ <u>Investment Management Services</u> ▪ <u>Personal Fiduciary Activities</u> ▪ <u>Retirement Plan Products and Services</u> ▪ <u>Unique and Hard-to-Value Assets</u> <p><u>OCC Bulletin 2008-10</u> <i>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> <p>✓</p> <p>✓</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		
<u>Texas Finance Code</u>		
Texas Trust Company Act (<i>Texas Finance Code, Subtitle F, Chapters 181-199</i>)		
Section <u>181.002</u> (a)(7) - Capital	✓	
(8) - Certified Surplus	✓	
(11) - Company	✓	
Section <u>182.008</u> - Restricted Capital	✓	
Section <u>182.011</u> - Exemption from Statutory Provisions for Certain Trust Companies	✓	
Section <u>182.101</u> - Amendment or Restatement of State Trust Company Certificate of Formation	✓	
Section <u>182.103</u> – Change in Restricted Capital	✓	
Section <u>182.104</u> - Capital Notes or Debentures	✓	
Section <u>183.001</u> - Acquisition of Control	✓	
Section <u>184.002</u> - Investment in State Trust Company Facilities	✓	
Section <u>184.101</u> - Securities	✓	
Section <u>184.102</u> - Transactions in State Trust Company Shares or Participation Shares	✓	
Texas Administrative Code		
TAC § <u>21.51</u> (a) Application for Change of Control	✓	
TAC § <u>21.91</u> Acquisition and Retention of Shares as Treasury Stock	✓	

TRUST REFERENCE MATERIAL

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

#7—TRUST COMPANY CAPITAL ADEQUACY

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

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 (TFC Ch 181-199)		
<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>	✓	

TRUST REFERENCE MATERIAL

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

#8–TRUST COMPANY ASSET QUALITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<u>7 TAC §19.22</u> <i>Investments in Mutual Funds</i>	✓	
<u>7 TAC § 19.51</u> - <i>Other Real Estate Owned</i>	✓	
Texas Property Code		
<u>Section 74.101</u> <i>Property Report</i>	✓	
Federal Reserve Laws and Regulations		
<u>Section 23 A</u> & <u>B</u> <i>of the Federal Reserve Act - Banking Affiliates</i>	✓	
<u>12 USC 225.28</u> - <i>List of Permissible Non-Banking Activities (Regulation Y)</i>	✓	
POLICY ISSUANCES		
Department Policy Memorandum		
<u>SM 1002</u> - <i>Trust Company Rating Systems</i>	✓	
<u>SM 1032</u> - <i>Policy for Other Real Estate Owned</i>	✓	
FDIC Issuances		
<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>	✓	
Federal Reserve Issuances		
<u>Policy on Statement on the "Responsibility of Bank Holding Companies to Act as Sources of Strength to their Subsidiary Bank"</u>		✓
Comptroller of the Currency Issuances		
<u>Banking Circular 57 - Banking Holding Company Affiliates</u>		✓

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><i>Comptroller's Handbook Insider Activities - Management and Other Fees</i></p> <p>FFIEC Issuances</p>		✓
<p>GENERALLY ACCEPTED ACCOUNTING PRINCIPLES Refer to FASB's Accounting Standards Codification (ASC)</p> <p><i>FAS No. 12 - Accounting for Certain Marketable Securities</i> (Superseded by FAS 115, paragraph 124)– <i>See ASC 320-Investments – Debt and Equity Securities</i></p> <p><i>FAS No. 13 - Accounting for Leases:</i> <i>See ASC 840 - Leases</i></p> <p><i>FAS No. 28 - Accounting for Sales With Leasebacks -</i> <i>See ASC 840 –Leases</i></p> <p><i>FAS No. 66 - Accounting for Sales of Real Estate -</i> <i>See ASC 360-20 Property, Plant and Equipment – Real Estate Sales</i></p> <p><i>FAS No. 80 - Accounting for Future Contracts</i> (Superseded by FAS 133, paragraph 525(a)) – <i>See ASC 815 – Derivatives and Hedging</i></p> <p><i>FAS No. 109 - Accounting for Deferred Income Taxes –</i> <i>See ASC 740-Income Taxes</i></p> <p><i>FAS No. 115 - Accounting for Certain Investments in Debt and Equity Securities -</i> <i>See ASC 320-Investments – Debt and Equity Securities</i></p> <p><i>FAS No. 142 – Goodwill and Other Intangible Assets –</i> <i>See ASC 350 – Intangibles – Goodwill and Other</i></p> <p><i>Technical Bulletin 85-2: Accounting for Collateralized Mortgage Obligations</i> (Superseded by FAS 125, paragraph 232, and FAS 140, paragraph 351(e)) – <i>See ASC 860-10-40 Transfers and Servicing</i></p>	<p>✓</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)

#8—TRUST COMPANY ASSET QUALITY

CITE	APPLICABLE TO ALL TRUST INSTITUTIONS	REFERENCE ONLY
<i>Position 92-3 - "Accounting for Foreclosed Assets"</i> <i>See ASC 310 – Receivables</i>	✓	
OTHER RELATED MATERIAL		
<i>Miller GAAP Guide 23 - Intangible Assets</i>	✓	
<i>Miller GAAP Guide, Chapter 28 – Leases</i>	✓	

(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
#10—TRUST COMPANY EARNINGS

Texas Department of Banking

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)</u> <i>Call Reports</i></p> <p>Texas Trust Company Act</p> <p><i>TFC Chapters 181-199</i></p> <p><u>Texas Finance Code</u></p> <p><u>Section 182.001(f)</u> - <i>Organization and General Powers of State Trust Company</i></p> <p><u>Section 184.101</u> - <i>Securities</i></p> <p><u>Section 184.301</u> - <i>Trust Deposits</i></p> <p><u>Section 184.401</u> - <i>Borrowing Limit</i></p> <p><u>Section 184.402</u> - <i>Pledge of Assets</i></p>	<p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	
<p>POLICY ISSUANCES</p> <p>Department Policy Memorandum</p> <p><u>SM 1002</u> - <i>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 style="text-align: center;">✓</p> <p style="text-align: center;">✓</p>	<p style="text-align: center;">✓</p>
<p>GENERALLY ACCEPTED ACCOUNTING PRINCIPLES</p>		
<p>OTHER RELATED MATERIAL</p>		

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

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> Supervisory Memorandum 1037 - Regulatory Treatment of Virtual Currencies Under the Texas Money Services Act <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> Federal Banking Agencies Issue <u>Joint Statement</u> on Enforcement of Bank Secrecy Act/Anti-Money Laundering Requirements (8/13/2020)	✓			
<u>FIL-78-2019</u> Bank Secrecy Act: Interagency Statement on Providing Banking Services to Customers Engaged in Hemp Production (12/3/2019)	✓			
<u>Press Release</u> 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>	✓			
<u>FIL-55-2018</u> / <u>PR-68-2018</u> 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)	✓			
<u>FIL-26-2018</u> FFIEC Issues New Customer Due Diligence and Beneficial Ownership Examination Procedures (05/11/2018)	✓			
<u>FIL-21-2016</u> Agencies Release Guidance to Issuing Banks on Applying Customer Identification Program Requirements to Holders of Prepaid Cards (03/21/2016)	✓			
<u>FIL-5-2015</u> Statement on Providing Banking Services (01/28/2015)	✓			
<u>FIL-41-2014</u> FDIC Clarifying Supervisory Approach to Institutions Establishing Account Relationships with Third-Party Payment Processors (07/28/2014)	✓			
<u>FIL-43-2013</u> FDIC Supervisory Approach to Payment Processing Relationships With Merchant Customers That Engage in Higher-Risk Activities (09/27/2013)	✓			
<u>PR-84-2013</u> Federal Regulators Issue Guidance on Reporting Financial Abuse of Older Adults (09/24/2013)	✓			
<u>FIL-3-2012</u> Payment Processor Relationships- Revised Guidance (01/31/2012) (Revised July 2014 – See <u>FIL-41-2014</u>)	✓			
FDIC Supervisory Insights-Summer 2011 - " <u>Managing Risks in Third-Party Payment Processor Relationships</u> " (07/21/2011)				✓
<u>FIL-17-2011</u> - Bank Secrecy Act - Guidance on Accepting Accounts from Foreign Embassies, Consulates, and Missions (03/24/2011)	✓			

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-72-2009</u> <i>Interagency Guidance on Transparency for U.S. Banking Organizations Conducting Cross Border Funds Transfers (12/17/2009)</i>	✓			
<u>FIL-127-2008</u> <i>Guidance on Payment Processor Relationships (11/07/2008) (Revised July 2014)</i>	✓			
<u>PR-79-2008</u> <i>FDIC and TX DOB Execute Information Sharing Agreement (09/15/2008)</i>	✓			
<u>FIL-71-2007</u> <i>Bank Secrecy Act Interagency Statement on Bank Secrecy Act/Anti-Money Laundering Requirements (8/23/2007)</i>	✓			
<u>PR-61-2007</u> <i>Agencies Issue Statement on Enforcement of Bank Secrecy Act/Anti-Money Laundering Requirements (07/19/2007)</i>	✓			
<u>FIL-05-2006</u> <i>Agencies and FinCEN Guidance on Sharing Suspicious Activity Reports with Controlling Companies (01/20/2006)</i>	✓			
<u>FIL-34-2005</u> <i>Guidance on Customer Identification Programs (4/28/2005)</i>	✓			
<u>FIL 32-2005</u> <i>Interpretive Guidance on Providing Banking Services to Money Services Businesses Operating in the United States (4/26/2005)</i>	✓			
<u>FIL-24-2005</u> <i>Bank Secrecy Act: Statement on Money Services Businesses (3/30/2005)</i>	✓			
<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-72-2004</u> <i>Guidance on Accepting Accounts from Foreign Governments, Foreign Embassies and Foreign Political Figures (06/16/2004)</i>	✓			
<u>FIL 4-2004</u> <i>Anti-Money Laundering Guidance on Customer Identification Programs (1/9/2004)</i>		✓		
<u>FIL 106-2001</u> <i>Privacy of Consumer Financial Information (12/20/2001)</i>	✓			
Federal Reserve Issuances				

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> : Agencies Issue Guide to Assist Community Banks to Develop and Implement Third-Party Risk Management Practices (5/3/24)	✓			
<u>SR-23-11</u> Interagency Statement for Banks on the Issuance of the Beneficial Ownership Information Access Rule (12/21/23)			✓	
<u>SR 21-8</u> Interagency Statement on Model Risk Management for Bank Systems Supporting Bank Secrecy Act/Anti-Money Laundering Compliance (4/9/21)			✓	
<u>SR 21-2</u> Answers to Frequently Asked Questions Regarding Suspicious Activity Reporting and Other Anti-Money Laundering Considerations (1/19/21)			✓	
<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> Joint Statement on Bank Secrecy Act Due Diligence Requirements for Customers Who May Be Considered Politically Exposed Persons (8/21/20)			✓	
<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 19-11</u> Joint Statement on Risk-Focused BSA/AML Supervision. <u>Joint Statement</u> (7/22/2019)			✓	
<u>SR 18-8</u> 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)			✓	
<u>SR 16-7</u> Interagency Guidance to Issuing Banks on Applying Customer Identification Program Requirements to Holders of Prepaid Access Cards (3/21/2016)			✓	
<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)	✓			
<u>SR 11-6</u> Guidance on Accepting Accounts from Foreign Embassies, Consulates and Missions (foreign missions) (03/24/2011)	✓			

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>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 08-08</u> <i>Compliance Risk Management Programs and Oversight at Large Banking Organizations with Complex Compliance Profiles (10/16/2008)</i>			✓	
FFIEC Issuances				
<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)				✓
<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</u> : <i>Treasury Extends Effective Dates of Orders Issued Under New Authority to Counter Fentanyl (7/9/25)</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>FinCEN Permits Banks to Use Alternative Collection Method for Obtaining TIN Information (6/27/25)</i>	✓			
<u>Press Release</u> : <i>Financial Action Task Force Identifies Jurisdictions with Anti-Money Laundering, Countering the Financing of Terrorism, and Counter-Proliferation Finance Deficiencies (6/23/25)</i>	✓			
<u>Press Release</u> : <i>FinCEN Issues Advisory Highlighting Iranian Oil Smuggling, Shadow Banking, and Weapons Procurement Typologies (6/6/25)</i>	✓			
<u>Press Release</u> : <i>FinCEN Issues Alert on Oil Smuggling Schemes on the U.S. Southwest Border Associated with Mexico-Based Cartels (5/1/25)</i>	✓			
<u>Press Release</u> : <i>FinCEN Renews Residential Real Estate Geographic Targeting Orders (4/14/25)</i>	✓			
<u>Press Release</u> : <i>FinCEN Issues Alert on Bulk Cash Smuggling and Repatriation by Mexico-based Transnational Criminal Organizations (3/31/25)</i>	✓			
<u>Press Release</u> : <i>FinCEN Removes Beneficial Ownership Reporting Requirements for U.S. Companies and U.S. Persons, Sets New Deadlines for Foreign Companies (3/21/25)</i>	✓			
<u>News Release</u> : <i>FinCEN Issues Southwest Border Geographic Targeting Order (3/11/25)</i>	✓			
<u>News Release</u> : <i>FinCEN Not Issuing Fines or Penalties in Connection with Beneficial Ownership Information Reporting Deadlines (2/27/25)</i>	✓			
<u>News Release</u> : <i>Financial Action Task Force Identifies Jurisdictions with Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Finance Deficiencies (2/26/25)</i>	✓			
<u>Alert</u> : <i>Alert on Impact of Ongoing Litigation – Deadline Stay – Voluntary Submission Only of Beneficial Ownership Information Reports (12/27/24)</i>	✓			
<u>FIN-2024-Alert005</u> : <i>FinCEN Warns of Fraud Schemes That Abuse Its Name, Insignia, and Authorities for Financial Gain (12/18/24)</i>	✓			
<u>News Release</u> : <i>FinCEN Issues Alert on Fraud Schemes Involving Deepfake Media Targeting Financial Institutions (11/13/24)</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>News Release:</u> <i>Financial Action Task Force Identifies Jurisdictions with AntiMoney Laundering, Combating the Financing of Terrorism, and CounterProliferation Finance Deficiencies (10/30/24)</i>	✓			
<u>FIN-2024-NTC7:</u> <i>FinCEN Provides Beneficial Ownership Information Reporting Relief to Victims of Hurricane Beryl; Certain Filing Deadlines in Affected Areas Extended Six Months (10/29/24)</i>	✓			
<u>News Release:</u> <i>FinCEN Issues Alert to Financial Institutions to Counter Financing of Hizballah and its Terrorist Activities (10/23/24)</i>	✓			
<u>News Release:</u> <i>FinCEN Publishes Beneficial Ownership Reporting Outreach and Education Toolkit (9/19/24)</i>	✓			
<u>Final Rule:</u> <i>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)</i>	✓			
<u>Final Rule:</u> <i>Anti-Money Laundering Regulations for Residential Real Estate Transfers (8/28/24)</i>	✓			
<u>News Release:</u> <i>FinCEN Reminds Financial Institutions to Remain Vigilant to Suspicious Transactions Associated with Synthetic Opioids (8/26/24)</i>	✓			
<u>Press Release:</u> <i>FinCEN Finalizes Financial Measure Against Iraq-based Al-Huda Bank to Combat Terrorist Financing (6/26/24)</i>	✓			
<u>FIN-2024-A001:</u> <i>FinCEN Issues Advisory on Iran-Backed Terrorist Organizations (5/8/24)</i>	✓			
<u>Press Release:</u> <i>FinCEN Reminds Financial Institutions to Remain Vigilant to Environmental Crimes (4/22/24)</i>	✓			
<u>Press Release:</u> <i>FinCEN Renews Real Estate Geographic Targeting Orders (4/17/24)</i>	✓			
<u>FIN-2024-R001:</u> <i>FinCEN Publishes an Administrative Ruling Regarding Customer Identification Program and Customer Due Diligence Requirements for Designated Beneficiaries of Individual Retirement Accounts (3/15/24)</i>	✓			
<u>Press Release:</u> <i>Financial Action Task Force Identifies Jurisdictions with Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Deficiencies (2/29/24)</i>	✓			
<u>Press Release:</u> <i>FinCEN Issues Final Rule Regarding Access to Beneficial Ownership Information (12/21/23)</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> - FinCEN Finalizes Rule on Use of FinCEN Identifiers in Beneficial Ownership Information Reporting (11/7/23)	✓			
<u>Press Release</u> - FinCEN Alert to Financial Institutions to Counter Financing to Hamas and Its Terrorist Activities (10/20/23)	✓			
<u>Press Release</u> : 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)	✓			
<u>Press Release</u> : FinCEN Renews and Expands Real Estate Geographic Targeting Orders (4/21/23)				✓
<u>Press Release</u> FinCEN Issues Initial Beneficial Ownership Information Reporting Guidance (3/24/23)	✓			
<u>Press Release</u> 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)				✓
<u>Press Release</u> FinCEN Alert on Nationwide Surge in Mail Theft-Related Check Fraud Schemes Targeting the U.S. Mail (2/27/23)	✓			
<u>News Release</u> FinCEN Alert on Potential U.S. Commercial Real Estate Investments by Sanctioned Russian Elites, Oligarchs, and Their Proxies (1/25/23)	✓			
<u>News Release</u> FinCEN Issues Alert on Human Smuggling Along the Southwest Border of the United States (1/13/23)	✓			
<u>News Release</u> New FinCEN Analysis of BSA Data Reveals Trends on the Financial Activity of Russian Oligarchs (1/22/23)				✓
<u>News Release</u> FinCEN Issues Notice of Proposed Rulemaking Regarding Access to Beneficial Ownership Information and Related Safeguards (12/15/22) <u>NPRM Fact Sheet</u>	✓			
<u>Press Release</u> - FinCEN Issues Final Rule for Beneficial Ownership Reporting to Support Law Enforcement Efforts, Counter Illicit Finance, and Increase Transparency (9/29/22) The effective date for the rule is January 1, 2024.	✓			
<u>FIN-2022-Alert003</u> 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)	✓			

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> – Joint Statement on the Risk-Based Approach to Assessing Customer Relationships and Conducting Customer Due Diligence (7/6/2022)	✓			
<u>Press Release</u> Statement on BSA Due Diligence for Independent ATM Owners or Operators (6/22/22)	✓			
<u>FIN-2022-A001</u> Advisory on Elder Financial Exploitation (6/15/2022)	✓			
<u>Press Release</u> : FinCEN Issues Advisory on Kleptocracy and Foreign Public Corruption (4/14/2022)	✓			
<u>FIN-2022-A001</u> Advisory on Kleptocracy and Foreign Public Corruption (4/14/2022)	✓			
<u>Press Release</u> : FinCEN Announces Actions to Support REPO Multilateral Task Force and Ongoing U.S. Government Efforts to Combat Foreign Government Corruption (3/16/2022)	✓			
<u>FIN-2022-Alert002</u> : FinCEN Alert on Real Estate, Luxury Goods, and Other High-Value Assets Involving Russian Elites, Oligarchs, and their Family Members (3/16/2022)	✓			
<u>Press Release</u> : FinCEN Renews Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (10/29/21)				✓
<u>FIN-2021-A004</u> Advisory on Ransomware and the Use of the Financial System to Facilitate Ransom Payments (11/8/21)	✓			
<u>Press Release</u> : FinCEN Issues Report on Ransomware Trends in Bank Secrecy Act Data Between January 2021 and June 2021 (10/15/21)				✓
<u>Press Release</u> : FinCEN Provides FBAR Relief to Victims of Recent Natural Disasters (10/5/21)				✓
<u>FIN-2021-NTC3</u> FinCEN Calls Attention to Online Child Sexual Exploitation Crimes (9/16/21)	✓			
<u>Press Release</u> : FinCEN Issues First National AML/CFT Priorities and Accompanying Statements (6/30/21)	✓			
<u>Press Release</u> : FinCEN Reissues Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (4/29/21)				✓

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

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(Statutes, Regulatory Guidance, Supervisory Memorandums, Select Legal Opinions)
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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<i>Press Release</i> – Agencies Issue Statement on Bank Secrecy Act Due Diligence Requirements for Customers Who May Be Considered Politically Exposed Persons_(8/21/2020)	✓			
<i>FinCEN Statement on Enforcement of the Bank Secrecy Act</i> (8/18/2020)				✓
<i>FIN-2020-G002</i> Frequently Asked Questions Regarding Customer Due Diligence (CDD) Requirements for Covered Financial Institutions (8/3/2020)	✓			
<i>FIN-2020-A005</i> Advisory on Cybercrime and Cyber-Enabled Crime Exploiting the Coronavirus Disease 2019 (COVID-19) Pandemic (7/30/2020)	✓			
<i>FIN-2020-Alert001</i> Financial Crimes Enforcement Network Alerts Financial Institutions to Convertible Virtual Currency Scam Involving Twitter (7/16/2020)	✓			
<i>FIN-2020-A003</i> Advisory on Imposter Scams and Money Mule Schemes Related to Coronavirus Disease 2019 (COVID-19) (7/7/2020)	✓			
<i>FIN-2020-G001</i> FinCEN Guidance Regarding Due Diligence Requirements under the Bank Secrecy Act for Hemp-Related Business Customers (6/29/2020)	✓			
<i>FinCEN Advisory FIN-2020-A002</i> Advisory on Medical Scams Related to the Coronavirus Disease 2019 (COVID-19) (5/18/20)	✓			
<i>FinCEN Notice FIN-2020-NTC3</i> - Notice Related to the Coronavirus Disease 2019 (COVID-19) (5/18/20)	✓			
<i>Press Release</i> : FinCEN Reissues Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (5/8/20)	✓			
<i>Paycheck Protection Program Frequently Asked Questions</i> (4/13/20)	✓			
<i>Press Release</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>FinCEN Notice FIN-2020-NTC2</i> - Updated FinCEN Notice to Financial Institutions Regarding COVID-19 (4/3/20)	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<i>Press Release: 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>	✓			
<i>FinCEN Notice FIN-2020-NTC1 - FinCEN Notice to Financial Institutions Regarding COVID-19 (3/16/20)</i>	✓			
<i>Press Release: FinCEN Reissues Real Estate Geographic Targeting Orders for 12 Metropolitan Areas (11/08/19)</i>	✓			
<i>Press Release: Imposition of Fifth Special Measure against the Islamic Republic of Iran as a Jurisdiction of Primary Money Laundering Concern (10/25/19)</i>	✓			
<i>FIN-2019-A006 Advisory to Financial Institutions on Illicit Financial Schemes and Methods Related to the Trafficking of Fentanyl and Other Synthetic Opioids (8/21/19)</i>	✓			
<i>FIN-2019-A005 Updated Advisory on Email Compromise Fraud Schemes Targeting Vulnerable Business Processes (7/16/2019)</i>	✓			
<i>News Release – FinCEN Reissues Real Estate Geographic Targeting Orders and Expands Coverage to 12 Metropolitan Areas (5/15/2019)</i>	✓			
<i>News Release: 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>	✓			
<i>FIN-2019-G001 - Application of FinCEN's Regulations to Certain Business Models Involving Convertible Virtual Currencies (5/9/2019)</i>	✓			
<i>FIN-2019-A003 - Advisory on Illicit Activity Involving Convertible Virtual Currency (5/9/2019)</i>	✓			
<i>News Release - Updated FinCEN Advisory Warns Against Continued Corrupt Venezuelan Attempts to Steal, Hide, or Launder Money (5/3/2019) FIN-2019-A002</i>	✓			
<i>News Release – FinCEN Reissues Real Estate Geographic Targeting Orders and Expands Coverage to 12 Metropolitan Areas (11/15/2018)</i>	✓			

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<i>FIN-2018-R004</i> <i>Exceptive Relief from Beneficial Ownership Requirements for Legal Entity Customers of Rollovers, Renewals, Modifications, and Extensions of Certain Accounts (9/7/2018)</i>	✓			
<i>FIN 2018-R003</i> <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> <i>Press Release</i>	✓			
<i>FIN-2018-A003</i> <i>Advisory on Human Rights Abuses Enabled by Corrupt Senior Foreign Political Figures and their Financial Facilitators (06/12/2018)</i>	✓			
<i>FIN-2018-R002</i> <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>	✓			
<i>FIN-2018-R001</i> <i>Administrative Ruling: Premium Finance Cash Refunds and Beneficial Ownership Requirements for Legal Entity Customers (05/11/2018)</i>	✓			
<i>Press Release</i> : <i>FinCEN Reminds Financial Institutions that the CDD Rule Becomes Effective Today (05/11/2018)</i>	✓			
<i>FIN-2018-G001</i> <i>Customer Due Diligence and Beneficial Ownership - BSA FAQs (4/3/2018)</i>	✓			
<i>Notice to E-Filers: FinCEN Announces Update to the Suspicious Activity Report (SAR)</i> <i>(Changes available in June of 2018)</i> (01/26/2018)	✓			
<i>BSA FAQ's</i> (12/15/2017)	✓			
<i>FIN-2017-A008</i> <i>Advisory on North Korea's Use of the International Financial System (11/2/2017)</i>	✓			
<i>FIN-2017-A007</i> <i>Advisory to Financial Institutions Regarding Disaster-Related Fraud (10/31/2017)</i>	✓			
<i>Notice</i> <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>	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<u>Notice</u> <i>FinCEN Encourages Communication from Financial Institutions Affected by Hurricanes Harvey, Irma, and Maria</i> (10/3/2017)	✓			
<u>FIN-2017-A006</u> <i>Advisory to Financial Institutions on Widespread Political Corruption in Venezuela</i> (9/20/2017)	✓			
<u>Memorandum on Financial Institution and Law Enforcement Efforts to Combat Elder Financial Exploitation</u> (8/30/2017)				✓
<u>Advisory FIN-2017-A003</u> <i>Advisory to Financial Institutions and Real Estate Firms and Professionals</i> (8/22/2017)	✓			
<u>News Release</u> <i>FinCEN Targets Shell Companies Purchasing Luxury Properties in Seven Major Metropolitan Areas / Revised <u>Geographic Targeting Orders</u></i> (8/22/2017)	✓			
<u>FAQs</u> <i>Regarding Customer Due Diligence Requirements for Financial Institutions</i> (7/19/2017)	✓			
<u>Announcement</u> <i>Important Notices to E-Filers: FinCEN Announces Update to the Currency Transaction Report (CTR) Announces Technical Webinar</i> (5/24/2017)	✓			
<u>News Release</u> <i>FinCEN Renews Real Estate “Geographic Targeting Orders” to Identify High-End Cash Buyers in Six Major Metropolitan Areas</i> (2/23/2017)	✓			
<u>FIN-2016-A005</u> <i>Advisory to Financial Institutions on Cyber-Events and Cyber-Enabled Crime</i> (10/25/2016)	✓			
<u>Frequently Asked Questions</u> <i>Regarding Reporting of Cyber-Events, Cyber-Enabled Crime, and Cyber-Related Information through Suspicious Activity Reports (SARS)</i> (10/25/2016)	✓			
<u>FIN-2016-A003</u> <i>Advisory to Financial Institutions on E-Mail Compromise Fraud Schemes</i> (9/6/2016)	✓			
<u>Final Rule</u> – <i>Customer Due Diligence Requirements for Financial Institutions</i> (5/11/2016)	✓			
<u>FIN-2016-G002</u> <i>FAQs Regarding Prepaid Access</i> (3/24/2016)				✓
<u>News Release</u> <i>FinCEN Renews and Broadens Geographic Targeting Orders on Border Cash Shipments in California and Texas</i> (8/7/2015)	✓			

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<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>				✓
<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>	✓			

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<i>FIN-2014-R001</i> <i>Application of FinCEN's Regulations to Virtual Currency Mining Operations (1/30/14)</i>				✓
<i>FIN-2014-R002</i> <i>Application of FinCEN's Regulations to Virtual Currency Software Development and Certain Investment Activity (1/30/14)</i>				✓
<i>FIN-2013-A007</i> <i>Supplement on U.S. Currency Restrictions on Banks in Mexico (09/27/2013)</i>				✓
<i>FIN-2013-R001</i> <i>FinCEN Issues Ruling on Armored Car Service Transactions - Addresses CTR Filings When Customers Use Armored Cars (7/12/2013)</i>	✓			
<i>FAQs regarding the FINCEN Currency Transaction Report (4/1/2013)</i>	✓			
<i>FAQs Regarding the FinCEN Suspicious Activity Report (4/1/2013)</i>	✓			
<i>FIN 2013-G001</i> <i>FinCEN Issues Guidance on Virtual Currencies and Regulatory Responsibilities (3/18/13)</i>				✓
<i>FIN-2013-A001</i> <i>FinCEN Issues Advisory to Financial Institutions: Update on Tax Refund Fraud and Related Identity Theft (2/26/13)</i>	✓			
<i>FIN 2012-A010</i> <i>- Risk Associated with Third Party Payment Processors (10/22/2012)</i>	✓			
<i>FIN 2012-G005</i> <i>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)</i>	✓			
<i>Notice - <i>Important Notice to Non-Bank Residential Mortgage Lenders and Originators</i> (08/13/2012)</i>	✓			
<i>FIN 2012-R005</i> <i>- FinCEN Ruling -Compliance Obligations of Certain Loan or Finance Company Subsidiaries of Federally Regulated Banks and Other Financial Institutions (07/19/2012)</i>	✓			
<i>FIN 2012-A006</i> <i>- Update on U.S. Currency Restrictions in Mexico (07/18/2012)</i>	✓			
<i>Press Release - <i>FinCEN Assesses Suspicious Activity Involving Title and Escrow Companies</i> (07/11/2012)</i>				✓

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
Press Release - FinCEN Marks the End of Paper SARs and CTRs - Final Reminder for Electronic Filing Requirement (06/29/2012)	✓			
FIN-2012-G003 Guidance on Determining Eligibility for Exemption from Currency Transaction Reporting Requirements (06/11/2012)	✓			
Final Rule - 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)	✓			
FIN-2012-A005 Tax Refund Fraud and Related Identity Theft (03/30/2012)	✓			
FIN-2012-G002 Filing FinCEN's New Currency Transaction Report and Suspicious Activity Report (03/29/2012).	✓			
FIN-2012-A003 and FIN-2012-A004 - 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)	✓			
FIN-2012-A001 FinCEN Advisory - Foreign-Located Money Services Businesses (02/15/2012)	✓			
FIN-2011-A016 FinCEN Advisory - Account Takeover Activity (12/19/2011)	✓			
Press Release - FinCEN Issues Prepaid Access Final Rule (07/26/2011)				✓
FIN 2011-A009 – Information on Narcotics and Bulk Currency Corridors (04/21/2011)	✓			
Press Release - FinCEN Releases Commercial Real Estate Fraud Analysis and Advisory (03/30/2011)	✓			
Press Release – FinCEN's Streamlined Regulations in New 31 CFR Chapter X Became Effective on March 1, 2011 (03/01/2011)	✓			
Amendment to the Bank Secrecy Act Regulations – Reports of Foreign Financial Accounts (02/24/2011)	✓			
FIN 2011-A003 Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding Elder Financial Exploitation (2/22/2011)	✓			

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<i>FIN-2010-G006</i> <i>Sharing Suspicious Activity Reports by Depository Institutions with Certain U.S. Affiliates (11/23/2010)</i>	✓			
<i>FIN-2010-A014</i> <i>Maintaining the Confidentiality of Suspicious Activity Reports (11/23/2010)</i>	✓			
News Release - <i>FinCEN Rule Strengthens SAR Confidentiality: Provides Guidance to Permit Sharing with Affiliates (11/23/2010)</i>	✓			
Guidance <i>FIN-2010-G004</i> <i>Funds “Travel” Regulations: Questions & Answers (11/09/2010)</i>	✓			
<i>Advisory 2010-A011</i> – <i>Informal Value Transfer Systems (09/01/2010)</i>	✓			
<i>FIN-2010-A007</i> <i>Newly Released Mexican Regulations Imposing Restrictions on Mexican Banks for Transactions in U.S. Currency (06/21/2010)</i>	✓			
<i>FIN-2010-A006</i> <i>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</i> : <i>Advisory to Financial Institutions Filing Suspicious Activity Reports Regarding Home Equity Conversion Mortgage Fraud Schemes (04/27/2010)</i>	✓			
<i>FIN-2010-A001</i> <i>Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding Trade-Based Money Laundering (02/18/2010)</i>	✓			
<i>FIN-2010-G001</i> <i>Guidance on Obtaining and Retaining Beneficial Ownership Information (03/05/2010)</i>	✓			
<i>FIN-2009-R003</i> <i>Ruling on Customer Identification Rule – Address Confidentiality Programs(01/12/2010)</i>	✓			
<i>FIN-2009-A006</i> <i>Advisory to Financial Institutions on Filing Suspicious Activity Reports Regarding TARP-related Programs (10/14/09)</i>	✓			
<i>FIN-2009-G003</i> <i>Determining the Eligibility for Exemption from Currency Transaction Reporting Requirements (08/31/2009)</i>	✓			

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CITE	ALL STATE BANKS	NON- FED MEM	STATE FED MEM	REF ONLY
<i>FIN-2009-R002</i> <i>Ruling on Treatment of Deposits by Armored Cars for Currency Transaction Report (CTR) Purposes (07/02/2009)</i>	✓			
<i>FIN-2009-G002</i> <i>Guidance on the Scope of Permissible Information Sharing Covered by Section 314(b) Safe Harbor of the USA PATRIOT Act (06/16/2009)</i>	✓			
<i>FIN 2009-G001</i> <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>	✓			
<i>FIN 2009-A001</i> <i>Guidance to Financial Institutions on Filing Suspicious Activity Reports regarding Loan Modification/Foreclosure Rescue Scams (04/06/2009)</i>	✓			
<i>News Release - FinCEN Announces Final Rule on Currency Transaction Exemption Reporting (12/04/2008)</i>	✓			
<i>Suspected Money Laundering in the Residential Real Estate Industry: An Assessment Based upon Suspicious Activity Report Filing Analysis (05/01/2008)</i>				✓
<i>FIN-2008-G005</i> <i>Filing Suspicious Activity Reports Regarding the Proceeds of Foreign Corruption (04/17/2008)</i>				✓
<i>FIN-2008-G002</i> <i>No Action Position to the CIP Rule for Broker-Dealers (03/04/2008)</i>				✓
<i>FIN-2008-G001</i> <i>Application of Correspondent Account Rules to the Presentation of Negotiable Instruments Received by a Covered Financial Institution for Payment (01/30/2008)</i>	✓			
<i>FIN-2007-G006</i> <i>Application of Definition of Money Services Business to Certain Owner-Operators of Automated Teller Machines Offering Limited Services (12/03/2007)</i>				✓
<i>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)</i>	✓			
<i>FIN-2007-G003</i> <i>Suspicious Activity Report Supporting Documentation (06/13/2007)</i>	✓			
<i>FIN-2007-G002</i> <i>Requests by Law Enforcement for Financial Institutions to Maintain Accounts (06/13/2007)</i>	✓			

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<u>FIN-2006-G015</u> – Customer Identification Programs and Banks Serving as Insurance Agents (12/12/2006)	✓			
<u>News Release – FinCEN Advises Financial Industry on Potential Risks of Shell Companies</u> (11/09/2006)	✓			
<u>FIN-2006-G012</u> – Conducting Independent Reviews of MSBs Anti-Money Laundering Programs (09/22/2006)				✓
<u>FIN-2006-G007</u> – Frequently Asked Questions – Customer Identification Program Responsibilities Under the Agency Lending Disclosure Initiative (04/25/2006)	✓			
<u>FIN-2006-A003</u> – Guidance to Financial Institutions on the Repatriation of Currency Smuggled into Mexico from the United States (04/28/2006)	✓			
<u>FIN-2006-G005</u> <u>Frequently Asked Questions – Businesses Cashing Their Own Checks</u> (03/31/2006)	✓			
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) Concerning Completion of Part II of FinCEN Form 104, Currency Transaction Report</u> (8/12/2005)	✓			
Guidance: <u>Interagency Interpretive Guidance on Customer Identification Program Requirements under Section 326 of the USA PATRIOT Act</u> (4/28/2005)	✓			
<u>FinCEN's Advisory</u> on Guidance to Money Service Businesses on Obtaining and Maintaining Banking Services (4/26/2005)				✓
<u>FinCEN Guidance 2004-02</u> – Interpretation of Suspicious Activity Reporting Requirements to Permit the Unitary Filing of Suspicious Activity and Blocking Reports (12/2004)	✓			
Comptroller of the Currency Issuances				

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<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>				✓
<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>	✓			

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> – Joint Fact Sheet on Foreign Correspondent Banking (8/30/2016)	✓			
<u>Press Release</u> : Treasury Takes Actions to Further Restrict North Korea’s Access to the U.S. Financial System (6/1/2016)	✓			
<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)				✓
CSBS <u>Marijuana Licensing Map</u> (9/22/17)				✓
CSBS <u>Marijuana-Related Business Job Aid</u> (requires log in)				✓
CSBS Issues <u>BSA/AML Assessment Tool</u> (1/18/2017)	✓			
<u>Money Laundering and Financial Crimes</u> (March 2014) an International Narcotics Control Strategy Report				✓
<u>The Buck Stops Here: Improving U.S. Anti-Money Laundering Practices</u> (Source: U.S. Senate) (April 2013)				✓
<u>Basel Committee on Banking Supervision Paper</u> - Due diligence and transparency regarding cover payment messages related to crossborder wire transfers (May 2009)				✓
<u>Compliance Tips for MSBs and Other SAR Filers</u> (10/10/2007)				✓
<u>FATF Report on New Payment Methods</u> (10/13/2006)				✓
<u>The Misuse of Corporate Vehicles, Including Trust and Company Service Providers</u> (10/2006)				✓
<u>U.S. Money Laundering Threat Assessment</u> (12/2005)				✓
<u>Press Release-Treasury and Federal Financial Regulators Issue Final Patriot Act Regulations on Customer Identification</u> (4/30/03)	✓			
<u>Financial Action Task Force (FATF) on Money Laundering</u>	✓			
Title III of HR 3162 USA Patriot Act	✓			