

Lindsey Stern, CRCM, FLE Lindsey@viableconsultingus.com www.viableconsultingus.com Phone: (406) 580-5440 Cell

Summary of BSA Services

An independent audit will be completed according to the procedures outlined in the Federal Financial Institutions Examination Council (FFIEC) BSA/AML Examination Manual. Audit scope will include each of the areas listed below with appropriate transaction testing based on the financial institution's size, location, accounts/services offered, account opening methods, customer base and operational functions with respect to BSA/AML compliance.

- Bank Secrecy Act/Anti-Money Laundering (BSA/AML) policy and procedures
- BSA/AML/OFAC Risk Assessments
- Customer Identification Program (CIP)
- Customer Due Diligence Program (CDD)
- Beneficial Ownership (BO)
- Enhanced Due Diligence Procedures
- Identification and Management of High-Risk Activities, Customers, and Products
- Funds Transfers
- Monetary Instruments
- Currency Transaction Reports (CTRs) processes and filed CTRs
- CTR Exemption processes and filed Designation of Exempt Persons (DOEP)s
- Suspicious Activity Reports (SARs) processes and filed SARs
- Information Sharing Section 314(a) and 314(b)
- Office of Foreign Asset Control (OFAC) procedures
- BSA/AML/OFAC Training
- Compliance with BSA recordkeeping requirements
- Previous examination and independent audit findings
- Automated Suspicious Activity Monitoring System
- Regulation GG Unlawful Internet Gambling Policy and procedures