2010 Mid-Atlantic Anti-Money Laundering Conference

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Federal Deposit Insurance Corporation
Mergers and Acquisitions

USA Patriot Act:

- Section 327 amended Section 18(a) FDI Act
  - “shall take into consideration the effectiveness of any insured depository institution involved in the proposed merger transaction in combating money laundering activities, including in overseas branches”
Mergers and Acquisitions

Personnel:

- Number of employees assigned to BSA
- Knowledge of BSA
- Training
- Assignment of Duties
Mergers and Acquisitions

Information Technology
- Compatible Systems
- Strategy for systems migration
- Storage of BSA Documents

Update Policies and Procedures
- Staff knowledgeable of changes
- Are merged customers/branches in HIFCA/HIDTAs
Dodd-Frank Wall Street Reform and Consumer Protection Act (H.R. 4173)

- **Orderly Liquidation Authority**
  - Systemic financial companies
  - 3-keys systemic risk determination

- **Consumer Financial Protection Bureau**
  - Examination and Enforcement for Smaller IDIs
  - Agencies must coordinate with Bureau
  - Bureau may make referrals or recommendations
Changes to FDIC Deposit Insurance

- Minimum Reserve Ratio
- Assessment Base
- Permanent (and Retroactive) increase in Deposit Insurance Amount
H.R. 4173 (Continued)

- Transaction Account Guarantee Program Extension
- Examination Back-up Authority
Federal Deposit Insurance Corporation

Questions?