

ISSUE	INSTITUTION	VIOLATIONS/FINDINGS	ACTION	AGENCY	DATE	PENALTY/ CORRECTIVE ACTION
BSA/AML	First Abu Dhabi Bank USA N.V., Washington	<ul style="list-style-type: none"> <li>Primarily during the period of 2016 to 2019, the Branch violated 12 C.F.R. § 21.21, 12 C.F.R. § 21.11, and 31 C.F.R. § 1010.610. Specifically, the Branch failed to adopt and implement a compliance program that adequately covered the required BSA/AML program elements, and the Branch failed to timely file Suspicious Activity Reports (“SARs”) related to suspicious customer activity. Including:</li> <li>Inadequate system of internal controls, ineffective independent testing, a weak BSA Officer function, and insufficient staffing and training.</li> <li>Systemic deficiencies in its transaction monitoring systems and alert management processes, which resulted in monitoring gaps. These systemic deficiencies resulted in alert and investigation backlogs, and led to a failure to file SARs in a timely manner.</li> <li>Systemic deficiencies in its customer due diligence, enhanced due diligence, and customer risk rating processes.</li> <li>Failed to file the necessary SARs concerning suspicious customer activity in a timely manner, in violation of 12 C.F.R. § 21.11.</li> <li>Failed to adopt and implement adequate due diligence programs for foreign correspondent accounts, in violation of 31 C.F.R. § 1010.610</li> </ul>	CMP	OCC	10/9/20	CMP: \$5,000,000

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<a href="#">CMS</a>	Citibank, Sioux Falls, SD	<ul style="list-style-type: none"> <li>Failed to implement and maintain an enterprise-wide risk management and compliance risk management program, internal controls, or a data governance program commensurate with the Bank's size, complexity, and risk profile.</li> </ul>	C&D	OCC	10/7/20	<ul style="list-style-type: none"> <li>Compliance Committee of at least five (5) members of which a majority shall be directors of the Bank who are not employees or officers</li> <li>Comprehensive Action Plan</li> <li>Data Governance Plan</li> <li>ERM Program</li> <li>Compliance Risk Management Plan</li> <li>Improve Capital Planning</li> <li>Staffing/technology resource assessment</li> <li>Enhance Bd/Mgmt Oversight</li> </ul>
<a href="#">Regulation E</a>	Sigue Corporation, SGS Corporation and GroupEx Corporation, Sylmar, CA	<ul style="list-style-type: none"> <li>Violated the Electronic Fund Transfer Act and the Remittance Transfer Rule by failing to provide numerous required disclosures.</li> <li>In some cases involving money-transfer errors, consumers were entitled to notice that a fee refund was available, and Sigure, SGS, and GroupEX failed to notify consumers that they were entitled to refunds.</li> </ul>		CFPB	8/31/20	Redress: \$100,00 CMP: \$300,000

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<a href="#">Regulation E</a> <a href="#">UDAAP</a>	Trans-Fast Remittance (New York, NY)	<ul style="list-style-type: none"> <li>Violated the Electronic Fund Transfer Act and the Remittance Transfer Rule by failing to adhere to error resolution requirements and properly respond to cancellation requests,</li> <li>Failing to provide required refunds,</li> <li>Failing to maintain required policies and procedures,</li> <li>Failing to provide required disclosures,</li> <li>Engaged in deceptive acts or practices in violation of the Consumer Financial Protection Act making misleading statements in advertisements regarding the speed of its remittance transfers and making misleading statements in disclosures purporting to limit consumers' error resolution rights.</li> </ul>	Consent Order	CFPB	8/30/20	CMP: \$1.6 million  Adopt a compliance plan to ensure that its remittance transfer acts and practices comply with all applicable Federal consumer financial laws and the consent order.

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<a href="#">Regulation E</a> <a href="#">UDAAP</a> <a href="#">Regulation V</a>	TD Bank, N.A. Cherry Hill, NJ	<ul style="list-style-type: none"> <li>• Regulation E by charging them overdraft fees without their consent;</li> <li>• Consumer Financial Protection Act of 2010 (UDAAP) by making deceptive claims that its overdraft service was “free” and other similar statements. The Bank also engaged in abusive practices by interfering with a consumer’s ability to understand the terms and conditions of the service including requiring new customers to sign its overdraft notice with the “enrolled” option pre-checked without mentioning the service and obscuring the overdraft notice to prevent a new customer’s review of their pre-marked “enrolled” status; and</li> <li>• Fair Credit Reporting Act and Regulation V in failing to implement reasonable written policies and procedures related to the accuracy and integrity of consumer information furnished to two nationwide specialty consumer reporting agencies and did not conduct timely investigations of indirect consumer disputes concerning furnished information.</li> </ul>	Settlement /Consent Order	CFPB	8/20/20	Restitution: \$97 million CMP: \$25 million <ul style="list-style-type: none"> <li>• Correct its DCA enrollment practices,</li> <li>• Stop using pre-marked overdraft notices to obtain a consumer’s affirmative consent to enroll in DCA, and</li> <li>• Adopt policies and procedures designed to ensure that TD Bank’s furnishing practices concerning nationwide specialty consumer reporting agencies comply with all applicable Federal consumer financial laws</li> </ul>

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<a href="#">BSA</a>	Unity Bank (Clinton, NJ)	<ul style="list-style-type: none"> <li>Weaknesses in BSA/AML Compliance Program</li> </ul>	Consent Order/C&D	FDIC	7/2/20	<ul style="list-style-type: none"> <li>Enhance Bd Oversight</li> <li>Improve BSA/AML program</li> <li>Improve Internal Controls</li> <li>Ensure OFAC Compliance</li> <li>Lookback CTR/SAR</li> </ul>
<a href="#">BSA</a>	Citizens State Bank Roma, TX	<ul style="list-style-type: none"> <li>Violations not specified. Deficiencies in management and board oversight.</li> </ul>	Consent Order	FDIC	6/30/20	<ul style="list-style-type: none"> <li>Enhance BSA/AML Compliance Program.</li> </ul>
<a href="#">BSA</a>	Neighborhood National Bank San Diego, CA	<ul style="list-style-type: none"> <li>Violation of 2016 Consent Order</li> <li>Bank violated 12 U.S.C. § 1818(s) and its implementing regulation, 12 C.F.R. § 21.21 (BSA compliance program);</li> <li>Bank violated 12 C.F.R. § 21.11 (suspicious activity report filings)</li> <li>Bank has not achieved timely compliance with the 2016 Consent Order and is in violation of the 2016 Consent Order;</li> <li>During the relevant period, the Bank has remained in violation of 12 C.F.R. § 21.21 and, on June 30, 2016, the OCC also cited the Bank for violation of 12 C.F.R. § 21.11</li> </ul>	CMP	OCC	6/23/20	CMP: \$100,000

<a href="#">BSA</a>	Community Bank of Texas, N.A. Beaumont, TX	<ul style="list-style-type: none"> <li>Deficiencies relating to the Bank’s compliance with Bank Secrecy Act/anti-money laundering (“BSA/AML”) laws and regulations, including a violation of 12 C.F.R. § 21.21(d)(1) (Internal Control Pillar) and other violations;</li> </ul>	Agreement	OCC	6/18/20	<ul style="list-style-type: none"> <li>Compliance Committee</li> <li>BSA Officer and Staff</li> <li>Written BSA Policies and Procedures</li> <li>CDD and EDD programs</li> <li>Automated SAR monitoring</li> <li>BSA/AML Audit</li> <li>BSA/AML Training</li> <li>Conduct Lookback</li> </ul>
<a href="#">BSA</a>	Security Bank Springfield, IL	<ul style="list-style-type: none"> <li>Specific violations not specified.</li> </ul>	Consent Order	FDIC	6/5/20	<ul style="list-style-type: none"> <li>Develop written BSA Compliance Program.</li> </ul>

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<a href="#">BSA Regulation E CMS</a>	Bank of Louisiana, New Orleans, LA	<ul style="list-style-type: none"> <li>• Failed to comply with 2011 MOU;</li> <li>• Inadequate CMS;</li> <li>• EFTA disclosure form omitted several required terms and several of the account statements sampled by examiners showed that customers were charged an undisclosed monthly debit card fee;               <ul style="list-style-type: none"> <li>○ Timely credit was not provided in at least two instances;</li> <li>○ Bank required an affidavit and police report from the alleged victim before it would investigate any alleged erroneous charge or provide provisional credit</li> </ul> </li> <li>• BSA - Lacked internal controls, Independent Testing, no qualified BSA Officer, inadequate training, violated CTR/SAR filing requirements, inadequate OFAC program</li> </ul>	C&D, CMP	FDIC	4/21/20	CMP: \$500,000 <ul style="list-style-type: none"> <li>• Increase Board Oversight</li> <li>• Add Outside Director</li> <li>• Retain Qualified Management</li> <li>• Implement Internal Audit Program</li> <li>• Revised written BSA Program</li> <li>• Qualified BSA Officer</li> <li>• BSA Internal Controls</li> <li>• BSA Testing</li> <li>• BSA Training</li> <li>• BSA Staffing Study</li> <li>• Look Back Review</li> <li>• Implement CMS</li> <li>• Correct Consumer Violations</li> <li>• Est. Compliance Committee</li> </ul>

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BSA	Mission Bank, San Francisco, CA	BSA/AML compliance program violation under 12 U.S.C. § 1818(s) and its implementing regulation, 12 C.F.R. § 21.21. <ul style="list-style-type: none"> <li>• Failed to implement adequate BSA/AML compliance program</li> <li>• Failed to correct a problem with its BSA/AML compliance program that the OCC previously reported to it.</li> </ul>	Consent Order	OCC	4/14/20	<ul style="list-style-type: none"> <li>• Compliance Committee</li> <li>• Revise Strategic Plan</li> <li>• Ensure Competent Management</li> <li>• Permanent qualified BSA Officer</li> <li>• BSA Internal Controls</li> <li>• SAR Board Reporting</li> <li>• Written SAR Compliance Plan</li> <li>• Risk Management for Automated Monitoring</li> <li>• CDD Policy and Proc.</li> <li>• Wire Controls</li> <li>• SAR Lookback</li> <li>• BSA Audit, Training</li> </ul>



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<a href="#">BSA</a>	International Bank of Chicago, Chicago, IL	Details not provided.	Consent Order	FDIC	4/1/20	<ul style="list-style-type: none"> <li>• Written BSA Program</li> <li>• Update CDD Program</li> <li>• Est. system for identifying, monitoring, and determining appropriateness of accounts with frequent or large cash, check, ACH, or wire transfer deposits and withdrawals</li> <li>• Look Back Review Plan</li> <li>• Retain Qualified BSA Management</li> <li>• Training</li> <li>• Independent Review</li> <li>• OFAC Program</li> <li>• Ensure Compliance with Conflict of Interest Policy</li> </ul>
<a href="#">UDAAP</a>	Fifth Third Bank, NA	Bureau alleges that for several years Fifth Third, without consumers' knowledge or consent: opened deposit and credit card accounts in consumers' names; transferred funds from consumers' existing accounts to new, improperly opened accounts; enrolled consumers in unauthorized online-banking services; and activated unauthorized lines of credit on consumers' accounts.	Complaint	CFPB	3/9/20	Bureau seeks an injunction to stop Fifth Third's unlawful conduct, redress for affected consumers, and the imposition of a civil money penalty.

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<a href="#">BSA (FinCEN)</a> <a href="#">BSA (OCC)</a>	Michael LaFontaine, former Chief Operational Risk Officer at U.S. Bank National Association (U.S. Bank)	Failed to prevent violations of the Bank Secrecy Act (BSA) and regulations issued pursuant to that Act.	CMP	FinCEN/OCC	3/4/20 3/5/20	\$450,000 CMP \$50,000 CMP
<a href="#">BSA</a>	California Business Bank, Irvine, CA	Details not provided.	Consent Order	FDIC	2/27/20	<ul style="list-style-type: none"> <li>• Comply with BSA</li> <li>• Correct Violations</li> <li>• Written Compliance Program</li> <li>• Qualified BSA/OFAC Officer</li> <li>• Testing</li> <li>• Review High Risk Accts.</li> </ul>
<a href="#">BSA</a>	Southwest Capital, Albuquerque, NM	Details not provided.	Consent Order	FDIC	2/10/20	<ul style="list-style-type: none"> <li>• Establish internal controls for monitoring reporting suspicious activity.</li> </ul>
<a href="#">BSA</a>	M.Y. Safra Bank, FSB New York, New York	Violation(s) of law, rule, or regulation, including those relating to BSA/AML compliance program requirements, 12 U.S.C. § 1818(s), 12 C.F.R. §21.21 and those related to the failure to monitor and investigate suspicious transactions and timely file suspicious activity reports ("SAR"), 12 C.F.R. § 163.180 and for noncompliance with the Operating Agreement	Consent Order/ C&D	OCC	1/30/20	<ul style="list-style-type: none"> <li>• Compliance Committee</li> <li>• Strategic Plan</li> <li>• BSA Officer and Staff</li> <li>• BSA Compliance Program Internal Controls</li> <li>• BSA Audit</li> <li>• SAR Monitoring</li> <li>• BSA Risk Assessment</li> <li>• CDD Procedures</li> <li>• BSA Training</li> </ul>

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<p><a href="#">Unlawful Conduct:</a></p> <ul style="list-style-type: none"> <li>• Fraud</li> <li>• Identity Theft</li> <li>• False records</li> </ul>	<p>Wells Fargo, Sioux Falls, SD</p>	<p>Per the DOJ:</p> <ul style="list-style-type: none"> <li>• Wells Fargo engaged in practices between 2002 and 2016 of pressuring employees to meet unrealistic sales goals that led thousands of employees to provide millions of accounts or products to customers under false pretenses or without consent, often by creating false records or misusing customers’ identities;</li> <li>• Wells Fargo admitted that it collected millions of dollars in fees and interest to which the Company was not entitled, harmed the credit ratings of certain customers, and unlawfully misused customers’ sensitive personal information, including customers’ means of identification.</li> </ul>	<p>Settlement</p>	<p>DOJ/SEC</p>	<p>2/21/20</p>	<p>Monetary Penalty: \$3 billion</p>

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<a href="#">TISA/UDAP</a>	Wells Fargo Executives, Sioux Falls, SD	Sales practices misconduct resulted in violations of consumer laws and regulations, including but not limited to: <ul style="list-style-type: none"> <li>• Unfair and Deceptive Acts and Practices;</li> <li>• Regulation DD/Truth in Savings; and</li> <li>• Regulation Z/Truth in Lending</li> </ul>	Notice of Charges  Personal Orders of Prohibition  Personal Orders to Cease and Desist  CMP	OCC	01/23/20	Request for Relief: <ul style="list-style-type: none"> <li>• Personal Orders of Prohibition,</li> <li>• Personal Orders to Cease and Desist</li> <li>• CMP               <ul style="list-style-type: none"> <li>○ \$500,000 – 25 mill.</li> </ul> </li> </ul> Consent Orders: <ul style="list-style-type: none"> <li>• Prohibition order and a \$17,500,000 CMP against former bank Chairman and CEO;</li> <li>• Personal cease and desist order and a \$2,250,000 CMP against the bank’s former Chief Administrative Officer and Director of Corporate Human Resources; and</li> <li>• Personal cease and desist order and assessment of a \$1,250,000 CMP against its former Chief Risk Officer for their roles in the bank’s sales practices misconduct.</li> </ul>

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<a href="#">CMS</a>	Park Bank Holmen, Wisconsin	Weaknesses in the area of consumer protection and compliance.	Consent Order	FDIC	1/28/20	<ul style="list-style-type: none"> <li>• Board Oversight of CMS</li> <li>• Qualified Management</li> <li>• Compliance Coordinator</li> <li>• Compliance Committee</li> <li>• Compliance Monitoring</li> <li>• Policy and Procedures</li> <li>• Training</li> <li>• Independent Review</li> </ul>
<a href="#">BSA</a>	Golden State Bank Glendale, California	Unsafe or unsound banking practices relating to the Bank's Bank Secrecy Act ("BSA") and Anti-Money Laundering ("AML")	Consent Order/ C&D	FDIC	1/7/20	<ul style="list-style-type: none"> <li>• Retain qualified management</li> <li>• Correct violation and take steps to ensure compliance including with BSA requirements.</li> </ul>

\*2020 (released as of November 25, 2020) DEPOSIT COMPLIANCE RELATED ENFORCEMENT ACTIONS  
(NUMBER BY PENALTY TYPE AND REGULATOR)

LAW/REGULATION	FDIC	FRB	OCC	CFPB	NCUA	FinCEN	OTHER	TOTAL
REGULATION CC								
REGULATION DD			(1**)					
REGULATION E	1			3				4
REGULATION D								
UDAP/UDAAP PRIVACY			1	1				2
CMS	1 (1*)		1					2
BSA	7 (1*)		5			1		13
OTHER							1(DOJ)	1
<b>TOTAL</b>	<b>9</b>		<b>7</b>	<b>4</b>		<b>1</b>	<b>1</b>	<b>22</b>

\*Deposit, BSA, and compliance management related enforcement actions against financial institutions, other companies, or individuals including information that may be helpful to financial institutions. Chart is intended to be an educational tool. Not guaranteed to be comprehensive.

\*\*The violation of this law/regulation was part of an enforcement action that contained violations of multiple laws/regulations. The violation of this particular law is notated in the chart, but is not counted as a separate enforcement action and, as a result, is not counted in the *Totals* of this chart in order to avoid duplicative results.