

ISSUE	INSTITUTION	VIOLATIONS/FINDINGS	ACTION	AGENCY	DATE	PENALTY/ CORRECTIVE ACTION
<a href="#">BSA/AML</a>	<b>USAA Federal Savings Bank (San Antonio, TX)</b>	USAA FSB willfully violated the BSA and its implementing regulations during the Relevant Time Period. Specifically, FinCEN has determined that USAA FSB willfully failed to implement and maintain an AML program that met the minimum requirements of the BSA, in violation of 31 U.S.C. § 5318(h) and 31 C.F.R. § 1020.210. Additionally, FinCEN has determined that USAA FSB willfully failed to accurately and timely report suspicious transactions to FinCEN, in violation of 31 U.S.C. § 5318(g) and 31 C.F.R. § 1020.320.	CMP	FinCEN	3/17/22	\$140,000,000
<a href="#">BSA/AML</a>	National Bank of Pakistan, Karachi, Pakistan and National Bank of Pakistan New York Branch, New York, NY	The most recent examination of the Branch conducted by the Federal Reserve Bank of New York (the "Reserve Bank") and the New York State Department of Financial Services ("NYSDFS") as of March 4, 2021 disclosed significant deficiencies in the Branch's risk management and compliance with federal laws, rules, and regulations relating to anti-money laundering ("AML") compliance, including the Bank Secrecy Act ("BSA") (31 U.S.C. § 5311 et seq.); the rules and regulations issued thereunder by the U.S. Department of the Treasury (31 C.F.R. Chapter X); and the requirements of Regulation K of the Board of In the Matter of NATIONAL BANK OF PAKISTAN Karachi, Pakistan and NATIONAL BANK OF PAKISTAN NEW YORK BRANCH New York, New York 2 Governors to report suspicious activity and to maintain an adequate BSA/AML compliance program (12 C.F.R. §§ 211.24(f) and 211.24(j)) (collectively, the "BSA/AML Requirements")	CMP	FRB	2/22/22	\$20,400,000
<a href="#">EFAA/Regulation CC</a>	Craig Meader, First National Bank of Kansas, Burlington, KS	Meader directed employees to implement extended holds on automated clearing house ("ACH") deposits in violation of the Expedited Funds Availability Act, 12 U.S.C. § 4001 et. seq. ("EFAA"), and 12 C.F.R. § 229.10(b)(1). Respondent was aware that the extended holds would violate the EFAA and 12 C.F.R. § 229.10(b)(1). Respondent's actions resulted in nine instances of violations of 12 C.F.R. § 229.10(b)(1).	CMP	OCC	2/10/22	\$3,000



DEPOSIT, BSA, AND COMPLIANCE MANAGEMENT ENFORCEMENT ACTIONS  
2022\*

\*2022 (as of March 17, 2022) DEPOSIT COMPLIANCE RELATED ENFORCEMENT ACTIONS  
(NUMBER BY PENALTY TYPE AND REGULATOR)

LAW/REGULATION	FDIC	FRB	OCC	CFPB	NCUA	FinCEN/OFAC	OTHER	TOTAL
REGULATION CC			1					1
REGULATION DD								
REGULATION E								
REGULATION D								
UDAP/UDAAP								
PRIVACY								
CMS								
BSA		1				1		2
OFAC								
OTHER								
<b>TOTAL</b>		<b>1</b>	<b>1</b>			<b>1</b>		<b>3</b>

Deposit, BSA, and Compliance Management related enforcement actions against financial institutions and other companies 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.