CONTENTS

Preface		vii
Chapter 1	Introduction	1
Chapter 2	OCC Initiatives	3
Chapter 3	Penalties	5
Chapter 4	Asset Forfeiture	7
Chapter 5	Internal BSA Compliance Programs	9
Chapter 6	Exemptions from the CTR Filing Requirements	15
Chapter 7	Suspicious Activity Reporting Requirements	19
Chapter 8	Opening and Maintaining Accounts and Customer Relationships	27
Chapter 9	High-Risk Areas	31
Chapter 10	Common Money Laundering Schemes	45
Chapter 11	Reporting to Treasury	51
Chapter 12	The Office of Foreign Assets Control	53
Chapter 13	Examination Procedures	57
Chapter 14	Quality of Risk Management	61
Chapter 15	Quantity of Risk	71
Chapter 16	Conclusions	89

vi	Contents
1.4	Contonto

6.

Appendix B. Bank Secrecy Act Databases Appendix C. Referring BSA Violations to FinCEN Appendix D. Availability of Office of Foreign Asset Control Information Appendix E. Basle Supervisors' Committee Statement of Principles on Money Laundering References			
Appendix C. Referring BSA Violations to FinCEN Appendix D. Availability of Office of Foreign Asset Control Information Appendix E. Basle Supervisors' Committee Statement of Principles on Money Laundering References	Appendix A.	FinCEN Policy Statements and Guidelines	93
Appendix D. Availability of Office of Foreign Asset Control Information 10 Appendix E. Basle Supervisors' Committee Statement of Principles on Money Laundering 10 References 10	Appendix B.	Bank Secrecy Act Databases	95
Appendix E. Basle Supervisors' Committee Statement of Principles on Money Laundering 10 References 10	Appendix C.	Referring BSA Violations to FinCEN	99
on Money Laundering References 10	Appendix D.		103
	Appendix E.		105
Index 11	References		109
	Index		111

.