

**NEW BUSINESS DEPOSIT ACCOUNT
TO BE COMPLETED AT ACCOUNT OPENING**

**COMMERCIAL LOAN
BANK SECRECY ACT/PATRIOT ACT DISCLOSURE**

USA PATRIOT Act Disclosure. To help the government combat the financing of terrorism and protect the international financing system from money laundering activities and financing of terrorism risks, the Bank Secrecy Act (BSA) a federal law, requires financial institutions to obtain, verify, and record information that identifies each person who opens an account or makes application for a loan.

As a customer of Colombo Bank, we want you to know that we value our relationship with you and appreciate your understanding and cooperation in the Bank's compliance efforts.

1. Relationship Profile:

- a. Customer Name: _____
- b. Update Photo ID (if none on file for signers)
- c. Mailing Address: no change changed _____
- d. Phone Number: no change changed _____
- e. Account Purpose: Personal Business Savings Retirement Loan
 Other _____
Please, explain

2. Gambling:

Do you do any Internet Gambling? Yes No

3. How Did They Hear About the Bank or Who Referred Them to the Bank?

- Bank Customer Bank Employee Board Director -Who? _____
- Statement Stuffer Banner Bank Website Internet Search Engine
- Bankrate.com QwickRate.com ICBA Website/Ad Newspaper/Magazine Ad/Article
- Chamber of Commerce Business/Social/Community or Other Event - _____

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CUSTOMER NAME: _____ **RELATIONSHIP NUMBER:** _____

SELECT ONE OR MORE OF THE RATINGS LISTED BELOW AS IT PERTAINS TO THE ENTIRE CUSTOMER RELATIONSHIP NOT JUST THE NEWLY OPENED ACCOUNT.

KNOWN TO THE BANK

- New Customer – Unknown to the Bank
- Former Customer – Known to the Bank
- Existing Customer – Known to the Bank

Level of Risk

- HIGH-3**
- MODERATE-2**
- LOW-1**

Rating This Section

NUMBER OF ACCOUNTS

- 5 or more deposit and or loan accounts
- 2 to 4 deposit and/or loan accounts
- 1 deposit or loan account

Level of Risk

- HIGH-3**
- MODERATE-2**
- LOW-1**

Rating This Section

ACCOUNT ACCESS/AUTHORIZED SIGNERS

- Sole or Joint ownership with 3 or more authorized signers
- Joint account with 2 signers
- Account with Minor access to funds
- Institutional Account with authorized signer(s)
- Pay-on-Death Accounts
- Sole ownership with 1 signer

Level of Risk

- HIGH-3**
- MODERATE-2**
- MODERATE-2**
- MODERATE-2**
- MODERATE-2**
- LOW-1**

Rating This Section

CUSTOMER TYPE

Consumer or Business/Commercial

1. Higher Risk Customer Type **HIGH-3**
(See BSA Program Appendix E for full list)
 - New Business Type or Line of Business
 - Higher Risk Occupation/Industry
 - Temporary Residency/Foreign National
 - Attorney/Agent/Custodian/Accountant/Trustee
 - Derogatory History info/fraud alerts – ChexSystems/Equifax
2. Moderate Risk Customer Type **MODERATE-2**
 - Nominal or isolated instances of overdrafts/NSFs
 - Some derogatory info/fraud alerts – Explained and Reasonable
 - Nominal or isolated instances of late payments on loans
3. Low Risk Customer Type, Account Type(s)/Activity **LOW-1**
 - No history of overdrafts/NSFs
 - No derogatory info/fraud alerts – ChexSystems/Equifax
 - Pays loans on time and up to date

Level of Risk

Rating This Section

HIGHER RISK CUSTOMER ACCOUNT HISTORY Level of Risk

Sum of all Ratings This Section

Based on known and researched account history for all accounts in the customer relationship, check off one or more of the following risk ratings as applicable.

- Defaulted or Habitually Late on Loan payments
- History of frequent overdrafts/NSFs in Current Accts
- Fraud Alert shows multiple attempts to open accounts
- Substantial derogatory info/fraud alerts
(Fraud, Account Abuse, NSF's, OD)
- None of the above noted

- HIGH-3**
- HIGH-3**
- HIGH-3**
- HIGH-3**
- ENTER "0" for "Sum of all Ratings This Section"

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SELECT ONE OR MORE OF THE RISK RATINGS LISTED BELOW FOR ACCOUNTS/PRODUCT TYPES WITHIN THE RELATIONSHIP

<u>ACCOUNT/PRODUCT TYPES</u>	<u>Level of Risk</u>	<u>Sum of all Ratings This Section</u>
<p>1. Higher Risk Account/Product Types</p> <ul style="list-style-type: none"> • Classic Checking • Focus Free Business Checking • Business Checking • Small Business Checking • NOW Interest Checking • Commercial NOW Interest Checking • Safe Deposit Box • Other Consumer/Unsecured • Commercial Real Estate • Acquisition Development & Construction • RDC or ACH 	<input type="checkbox"/> HIGH-3	<hr style="width: 100%;"/>
<p>2. Moderate Risk Account/Product Types</p> <ul style="list-style-type: none"> • Escrow • HELOC • Statement Savings • Minors Savings • Money Market Deposit (<i>Personal and Business</i>) • Promotional MM • Auto Refinance or Purchase • Personal Line of Credit (Overdraft) • Residential Loan • Equipment and Expansion Financing • Receivables and Working Capital Lines of Credit • Participation Loan 	<input type="checkbox"/> MODERATE-2	
<p>3. Low Risk Account/Product Types</p> <ul style="list-style-type: none"> • IRAs • IOLTAs • Certificates of Deposit (<i>Personal and Business</i>) • Institutional/Quickrate CD's • Term • SBA 7A, 504 	<input type="checkbox"/> LOW-1	

SELECT ONE OR MORE OF THE RATINGS LISTED BELOW ONLY AS IT APPLIES TO THE KNOWN AND/OR EXPECTED DEPOSIT ACTIVITIES FOR THE CUSTOMER RELATIONSHIP

<u>KNOWN/EXPECTED ACTIVITY</u>	<u>Level of Risk</u>	<u>Sum of all Ratings This Section</u>
<p>1. Higher Risk Account Activities</p> <ul style="list-style-type: none"> • Monthly Wire Transfers (Domestic/International) receiver/initiator • Frequent large Cash deposits/withdrawals (\$10,000 or more) /per month • High transactional activity (deposits, withdrawals or transfers) per month • Loan Payments Made in Cash • Average transactions totaling \$500,000 or more per month • Five (5) or more monetary instruments acquired/deposited per month • Mobile deposits 	<input type="checkbox"/> HIGH-3	<hr style="width: 100%;"/>

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2. Moderate Risk Account Activities MODERATE-2

- ACH Originator
- Checks deposited by Remote Deposit Capture
- One time and Repetitive ACH (Credit/Debit) ATM/Debit Card transactions
- Occasional or monthly Wire Transfer (Domestic/International) receiver/initiator
- eBanking Online Payments
- Occasional large Cash deposits/withdrawals (\$10,000 or more) /per month
- Moderate transactional activity (deposits, withdrawals or transfers) per month
- Average transactions totaling between \$10,000 and \$499,999 per month
- Two (2) to four (4) monetary instruments acquired/deposited per month

3. Low Risk Account Activities LOW-1

- Direct Deposit
- Infrequent or no (0) ACH (Credit/Debit) ATM/Debit Card transactions
- Infrequent or one time Wire transfers (Domestic) received/initiated
- Infrequent or Nominal Cash/Other Deposit Items
- Infrequent or Nominal transactional activity (deposits, withdrawals or transfers) per month
- Average transactions totaling \$10,000 or less per month
- Infrequent or no (0) monetary instruments acquired/deposited per month

Overall Customer Relationship BSA Risk Rating

Add the "Sum of all Ratings this Section" values then divide by the seven (7) Categories/Sections evaluated and rounded up to the nearest whole number.

Subtotal of "Sum of All Ratings This Section"

(Divided by (÷) Categories/Sections Evaluated:)

Equals Overall BSA Risk Rating:

Select the Overall Customer Relationship BSA Risk Rating: High – 3 Moderate – 2 Low – 1

Example # 1

	Category/Section	Example Answers	Level of Risk	Sum of all Ratings This Section
1.	Known to the Bank	New Customer	High Risk – 3	3
2.	Number of Accounts	2 to 4 deposit and/or loan accounts	Moderate – 2	2
3.	Account Access/Authorized Signers	Joint Account with 2 signers	Moderate – 2	2
4.	Customer Type	Low Risk Customer Type: No history or account abuse, late loan payments or other derogatory information on ChexSystems/Fraud Report	Low – 1	1
5.	Higher Risk Customer Account History	None of the above noted No derogatory account history	None – 0	0
6.	Account/Product Types	Can Do Checking Statement Savings IRA	Moderate – 2 Low – 1	3
7.	Expected/Current Account Activity	One Time and Repetitive ACH (ATM/Debit Card) eBanking Online Payments Moderate transactional activity	Moderate – 2	2
Subtotal				13

Subtotal Risk Ratings: 13 (divided by (÷) 7 Categories/Sections evaluated = **1.85** rounded up to the nearest whole number is **2** which represents an **Overall BSA Risk Rating of Moderate Risk - 2** for the Customer/Account Relationship.

Note: If the final overall risk rating value is a fraction, for example, 2.44; 1.25; and 2.56; round the number up to nearest whole number. Therefore, the aforementioned fractions should be rounded to 2; 1; and 3. Furthermore, any overall risk rating calculated as 3 or over is considered "High Risk". Customer relationships with an overall risk rating and/or determined by BSA/Compliance as "High Risk" irrespective of the overall BSA risk rating, will be placed on the high risk monitoring list and monitored by the BSA/Compliance.

Completed By: Name: _____ Signature: _____ Date ____/____/____

BSA/Compliance Verification: _____ Date ____/____/____