From: crodrigue [crodrigue@cbexpress.com] Sent: Monday, February 14, 2005 9:23 AM

To: regs.comments@federalreserve.gov; comments@fdic.gov;

regs.comments@occ.treas.gov; Comments, Regs

Subject: EGRPRA

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I am writing regarding the Economic Growth and Regulatory Paperwork Reduction Act request for comments.

I would like to submit the following comments on Bank Secrecy Act, USA Patriot Act, and Extensions of Credit to Insiders and Regulation O:

Bank Secrecy Act -

- a.. Increase the threshold for transactions requiring CTRs from \$10,000\$ to a higher amount.
- b.. Increase the threshold for monetary instruments from \$3,000 to a higher amount.
- c.. Eliminate annual recertification requirements for the same "exempt" customers
- d.. Increase the threshold for money laundering SARs from \$5,000 to a higher amount.
- e.. Establish a dollar threshold for insider abuse, eliminating SARs for small dollar theft.

USA Patriot Act and "Know Your Customer" Requirements:

- a.. Provide clear guidance regarding the customer identification standards such as what is considered an acceptable form of identification? Extensions of Credit to Insiders and Regulation O:
  - a.. Eliminate certain reporting requirements such as:
- a.. A report filed by a bank executive officer with the bank's board of directors whenever the executive officer obtains a loan from another bank in an amount that exceeds the amount the executive officer could obtain from his or her own bank;
- b.. An annual report from a bank's executive officers and principal shareholders to the board of directors of any outstanding loans from a correspondent bank.
- c.. Increase limits on inadvertent overdrafts from the current level of \$1,000.

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