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Sent: Monday, February 07, 2005 3:01 PM
To: regs.comments@federalreserve.gov; comments@fdic.gov;
regs.comments@occ.treas.gov; Comments, Regs
Subject: EGRPRA

Dear EGRPRA,

Money laundering and BSA plays an important role in deterring certain types of illegal activity. Our bank doesn't mind fulfilling its role in this law, but severe punishment for minor infractions of unclear interpretations is a tragedy. We recently had an examination and were criticized for a handful of violations on BSA. Our bank had worked hard on BSA, including training at every level, review of policies at board level, audit, and compliance consulting; and yet because we didn't keep "old style" reports with initials, our exemption list was disqualified. In a "snow ball" effect we were cited with other violations. I asked the examiner what other "new interpretations" we should watch for and he wasn't sure... but referenced a series of seminars that continued to ADD more items for them to check. We have since attended those seminars and found that statement to be true. This law seems to be a GROWING MONSTER that has no end in sight.

I would ask... PLEASE STOP THE NEW RULE INTERPRETATIONS AND LET US LIVE WITH A LAW THAT HAS SOME LIMITS.

Our exam team did a nice job of helping us ADJUST to the new rules. They also told us - "next time - it's ZERO tolerance. Maximum enforcement and maximum fines." That's a hard pill to take when the rules change from one visit to the next. I have five of our top people on this project at this time and expect an additional cost of \$100,000 this year. We take this law very seriously and always have!!

Thanks for asking for my opinion,
Chris Reid
CEO