

MSB RISK ASSESSMENT : CUSTOMER

***** Confidential - Internal Bank Use Only *****

Risk Factors	High Risk = 3*	Moderate Risk = 2*	Low Risk = 1*	Risk Rating
1. Time owned or managed the business	≤ 1 year	>1 year and < 3 years	≥ 3 years	
2. Does the business operate as an agent of another entity? For example, do they sell money orders or prepaid cell phones or rent moving vans to customers through an arrangement or contract with a third party such as Western Union, T-Mobile or U-Haul?	No, not for <u>any</u> of the MSB services.	Yes, for <u>part</u> of the MSB services.	Yes, for <u>all</u> of the MSB services.	
3. USA market area	Multi-state area	Statewide market	Local counties only	
4. Customer demographics	International customers in or from high risk areas	International customers <u>not</u> in or from high risk areas	Primarily citizens of the USA	
5. Number of owned MSB locations	>5	2 to 5	1	
6. Number of bank branches to be used	>3	2 or 3	1	
7. Number of Privately Owned ATMs installed at the business location(s)*	≥ 2***	1***	0	
8. Number of agent or franchise locations operating under agreement with MSB customer	>3	1 to 3	0	
9. Number of domestic owned MSB offices or agent offices located in US HIDTAs or HIFCAs	>3	1 to 3	0	
10. Any of the business offices located internationally?	Yes		No	
11. Valid FinCEN registration that has not expired	Not registered and not in process	Registered or proven in process	No registration required	
12. Valid State license(s) that has not expired	Not licensed and not in process	Has the two or more licenses required	Has only the one required license or no license as required	
13. Number of MSB services provided	≥ 4 types	2 or 3 types	Only 1 type	
14. Domestic currency deals or exchange transactions	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
15. International currency exchange deals	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
16. Types of checks cashed	Any check types, including international	Any check types, but <u>no</u> international	Limited to Fed, state or local government checks or in-state payroll checks	
17. Issue, sell or redeem traveler's checks, money orders or other negotiable instruments?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
18. Issue, sell or redeem prepaid access?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No, or <u>only</u> closed value cards.	
19. Domestic money transmitter?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
20. International money transmitter?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
21. List the risk factor of each service used by the MSB customer in the space provided below. Total the service factors and note the sum in the far right column titled "Risk Rating".	Currency deposits or withdrawals = 1 Check deposits = 1 US currency exchanges = 2 International currency exchanges = 3 US wire transfers = 2 International wire transfers = 3 Receipt of ACH transactions = 1 Receipt of IAT ACH transactions = 5 Receipt of Remotely Created Checks (RCC) = 35** Origination of ACH transactions = 2 Internet banking services = 3 Privately Owned ATMs = 3 Remote deposit capture (RDC) services = 3 Frequent purchase of official checks, travelers checks or other negotiable instruments = 2 Other, please describe and rate 1, 2 or 3 appropriately: _____			
RISK RATING TOTAL				
Low Risk = 35 or less Moderate Risk = 36 to 55 High Risk = 56 or higher				

* Unless otherwise noted within the risk factor category.

** Alert BSA Officer due to automatic high risk rating. Do not open a new account and CLOSE the existing account.

*** If ATMs are installed at business locations, the Customer Due Diligence (CDD) for Privately Owned ATMs questionnaire must be completed.

Completed by _____ Date _____