

**** Confidential – Internal Bank Use Only ****

MSB Risk Assessment: Customer _____

Risk Factors	High Risk = 3	Moderate Risk = 2	Low Risk = 1	Risk Rating
1. Time owned or managed the business	≤ 1 year	> 1 yr & < 3 yrs	≥ 3 years	
2. Agent of another entity?	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 not 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 agent or franchise locations operating under agreement with MSB customer.	> 3	1 to 3	0	
8. Number of domestic owned MSB offices or agent offices located in US HIDTAs or HIFCAs	> 3	1 to 3	0	
9. Any of the business offices located internationally?	Yes		No	
10. Valid FinCEN registration that has not expired	Not registered and not in process	Registered or proven in process	No registration required.	
11. Valid State license(s) that has not expired	Not licensed and not in process	Has the 2 or more licenses required	Has only the 1 required license	
12. Number of MSB services provided	≥ 4 types	2 or 3 types	Only 1 type	
13. 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	
14. 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	
15. Types of checks cashed	Any check types, including international	Any check types, but <u>no</u> international	Limited to Fed, state or local gov't checks or in-state payroll checks	
16. 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	
17. Issue, sell or redeem stored value cards?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No, or only closed value cards.	
18. Domestic money transmitter?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
19. International money transmitter?	Yes, with a daily limit in excess of \$3,000	Yes, with a daily limit of \$3,000 or less	No	
20. 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 = 1 Origination of ACH transactions = 2 Internet banking services = 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				

Completed by _____
 Financial Solutions * Revised 9/25/09

Date _____