

## MEMORANDUM

To: Our Valued Customers  
From: Sheshunoff Information Services  
Subject: Highlights

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*Top 200 Compliance Questions and Answers* now has even more answers, with added questions in several sections. We have also added a new area, Other Laws and Regulations, beginning with Regulation O, Loans to Executive Officers, Directors, and Principal Shareholders of Banks. New appendices contain regulatory agencies' answers to frequently asked questions about some of the laws and regulations.

Here are some of the new questions that are answered in this edition:

- Bank Secrecy Act:
  - What should a bank do if a law enforcement agency requests that an account be kept open because of possible suspicious or criminal activity?
  - Under what circumstances will a cease and desist order be issued by enforcement agencies?
  - When is a suspicious activity report required to be filed? What are the reporting thresholds?
  - What is considered a monetary instrument and what information is required to be obtained?
  - Can banks share information with other banks?
  - How are joint account withdrawals or deposits of cash handled for CTRs?
- Regulation B:

- When is a written credit application required under Reg B?
- What is considered adverse action?
- Regulation Z:
  - How is the amount financed determined?
  - Is rental property considered a consumer loan for Reg Z purposes?
- Flood Disaster Protection Act:
  - What coverage amounts are required for condominiums?
- Regulation C, HMDA:
  - When does HMDA not apply?
  - What loan amount is reported on the HMDA LAR for various types of loans?