



Anti-Money Laundering Questionnaire

Financial Institution Name:	Comerica Bank
Location:	1717 Main Street, Dallas, TX 75201
Senior Officer:	Joel Bongard Director, AML Compliance
Principal Regulator:	Federal Reserve Board of Dallas
RSSD ID:	60143

Anti- Money Laundering Questionnaire

I. General AML Policies, Practices and Procedures	
1. Is the AML compliance program approved by the FI's board or a senior committee?	YES
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	YES
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	YES
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function other independent third party that assesses AML policies and practices on a regular basis?	YES
5. Does the FI have a policy/procedures prohibiting accounts/relationships with shell banks? <i>(A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)</i>	YES
6. Does the FI have policies/procedures to reasonably ensure that they will not conduct transactions with or on behalf of shell bank through any of its accounts or products?	YES
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEPs), their families and close associates?	YES
8. Does the FI have record retention procedures that comply with applicable law?	YES
9. Are the FI's policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?	YES



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II. Risk Assessment	
10. Does the FI have a risk-based assessment of its customer base and their transactions?	YES
11. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	YES
III. Know Your Customer, Due Diligence and Enhanced Due Diligence	
12. Has the FI implemented processes for the identification of its customers on whose behalf it maintains or operates accounts or conducts transactions?	YES
13. Does the FI have a requirement to collect information regarding its customers' business activities?	YES
14. Does the FI assess its FI customers' AML policies or practices?	YES
15. Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?	YES
16. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and "Know Your Customer" information?	YES
17. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	YES
IV. Reportable Transactions and Prevention and Detection Transactions with Illegally Obtained Funds	
18. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	YES
19. Where cash transaction reporting is mandatory, does the FI have procedures to identify transaction structured to avoid such obligations?	YES
20. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	YES
21. Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	YES
V. Transaction Monitoring	
22. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and	YES



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monetary instruments such as travelers checks, money orders, etc.?	
VI. AML Training	
23. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	YES
24. Does the FI retain records of its training sessions including attendance records and relevant training materials used?	YES
25. Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	YES
26. Does the FI employ third parties to carry out some of the functions of the FI? Third parties are utilized to gather information final action/decision is completed by FI.	NO
27. If the answer to question 26 is yes, does the FI provide AML training to relevant third parties that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	

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Signature:	
Date:	01/8/2014