



Office of Foreign Assets Control Questionnaire

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

**OFAC Questionnaire**

<b>I. General OFAC Policies, Practices and Procedures</b>	
1. Does the Financial Institution (FI) have policies and procedures for complying with OFAC regulations and the various laws OFAC is responsible for administering.	<b>Yes</b>
2. Has the FI designated a person to be responsible for overseeing compliance with the OFAC regulations and any blocked funds?	<b>Yes</b>
3. Does the FI have a current listing of prohibited countries, organizations, and individuals?	<b>Yes</b>
4. Does the FI have a person who is responsible for maintaining a current list of prohibited countries, organizations, and individuals?	<b>Yes</b>
5. Does the FI compare new accounts with the OFAC prohibited listing?	<b>Yes</b>
6. Does the FI regularly compare established accounts and customer transactions with the prohibited OFAC listing?	<b>Yes</b>
7. Does the FI block or freeze the accounts and transactions that are found to match the prohibited OFAC listing?	<b>Yes</b>
8. Did the FI report the blocked or rejected accounts to OFAC within 10 days?	<b>Yes</b>



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9. Did the FI submit an annual report of the blocked property by September 30?	<b>Yes</b>
10. Does the FI have an OFAC compliance audit at least annually?	<b>Yes</b>
11. Does the FI have an OFAC scanning process?	<b>YES, Comerica scans both incoming and outgoing wire activity against the OFAC/SDN/PLC/FSE &amp; SSI lists and for activity involving sanctioned high risk countries. Alerts are generated and worked by the involved business unit/AML Compliance personnel. The customer is informed of all returned or blocked transactions through the relationship manager.</b>



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Title:	<b>SVP Director of AML Compliance</b>
Signature:	
Date:	<b>1/8/2016</b>