



Anti-Money Laundering Policy and Program Procedures

Dated: September 25, 2014

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GLOSSARY

AML	Anti-Money Laundering
BSA	Bank Secrecy Act
FinCEN	Financial Crimes Enforcement Network (U.S. Treasury Dept.)
OFAC	Office of Foreign Assets Control (U.S. Treasury Dept.)
RMLO	Residential Mortgage Lenders and Originators
SAR	Suspicious Activity Report
SDN	Specifically Designated Nationals and Blocked Persons List

I. Introduction

Montcalm County Habitat for Humanity (“Habitat”) is committed to a comprehensive anti-money laundering (“AML”) program. It is the policy of Habitat to comply fully and completely with all applicable governmental requirements that have been designed to prohibit and prevent both actual and potential money laundering, as well as other activities that facilitate money laundering and the funding of terrorists and/or other criminal activity, including mortgage fraud.

Habitat intends that these AML Policy and Program Procedures (“the Policy”) will be reviewed at least annually and updated from time to time as necessary to keep up with changes in applicable law and changes in Habitat’s operations. The Policy is intended to be supplemented by training of all Habitat’s non-construction employees and any volunteers who perform administrative duties (“designated volunteers”). The Policy is solely for the use of, and is binding upon, Habitat’s employees and designated volunteers. Willful or grossly negligent failure of an employee or designated volunteer to follow this AML Policy and Program Procedures Policy and such additional procedures as shall be issued to implement this Policy may be grounds for discipline, up to and including termination, and may in certain circumstances expose the employee or designated volunteer to criminal prosecution, fine, and/or imprisonment.

II. Money Laundering, Terrorist Financing and Mortgage Fraud

A. Money Laundering

“Money laundering” is generally defined as engaging in acts designed to conceal or disguise the nature, control, or true origin of criminally derived proceeds so that those proceeds appear to have been derived from legitimate activities or origins or otherwise constitute legitimate assets. Generally, money laundering occurs in three stages:

1. **Stage 1 - Placement:** Cash generated from criminal activities is “placed” in the financial system or the retail economy, often by converting the cash into monetary instruments, such as money orders or securities or investing it in real estate, commodities, or high-end consumer products (e.g., automobiles, boats, jewelry). Illegally obtained money is most vulnerable during the “placement” stage, because, over the years, regulators and law enforcement authorities have imposed a variety of reporting requirements and have required financial institutions, including residential mortgage lenders and originators (“RMLOs”), to train their employees to look for suspicious transactions.

To disguise the placement of unlawful funds, money launderers will often use a technique called “**Structuring**.” Structuring involves the breaking up of a transaction that would normally have to be recorded or reported into smaller transactions at dollar amounts below the recording/reporting thresholds.

2. **Stage 2 - Layering:** Funds are transferred or moved into other financial institutions to further separate the money from its criminal origin.
3. **Stage 3 - Integration:** Funds are reintroduced into the financial system and then integrated into the economy by purchasing legitimate assets or funding legitimate businesses or other criminal activities.

B. Terrorist Financing

Unlike money laundering, terrorist financing is typically motivated by ideological, rather than profit-seeking concerns, and often may not involve the proceeds of criminal conduct. Money laundering is frequently an important component of terrorist financing, and the methods used are often similar or identical to those used by money launderers. Large sums are not necessarily involved, and the original funds may well be legitimate rather than illegally obtained. The goal of terrorist financing is to establish flexible and mobile sources of funding for the purchase of products and services that will be used to further or commit terrorist acts.

C. Mortgage Fraud

Mortgage fraud is a crime in which the intent is to materially misrepresent or omit information on a mortgage loan application to obtain a loan or to obtain a larger loan, or a loan on different terms, than would have been obtained had the lender or borrower known the truth. Lenders or borrowers involved in mortgage fraud engage in conduct including the following: providing false financial information in the mortgage loan application, providing false information regarding occupancy, using nominees for the purchase of the property, falsifying documents (such as tax returns and verifications of income or deposits) and failing to disclose material information.

Government officials are increasingly focusing on mortgage fraud, and concerns regarding mortgage fraud contributed to the expansion of AML program requirements to RMLOs such as Habitat. The detection and prevention of mortgage fraud are important goals of Habitat's AML program.

III. AML Compliance Officer Designation and Duties

A. Designation of Compliance Officer

As required under the Bank Secrecy Act ("BSA") (1970), the USA PATRIOT Act (2001), and FinCEN's Anti-Money Laundering ("AML") Program and Suspicious Activity Report Filing Requirements for Residential Mortgage Lenders and Originators, Habitat hereby designates an AML Compliance Officer (the "Compliance Officer") for Habitat. The Compliance Officer, or any of his or her authorized designees (hereinafter, a "Designee"), is responsible for ensuring (1) Habitat's ongoing compliance with all state and federal AML laws, including monitoring compliance by the Habitat's employees and designated volunteers with their obligations under Habitat's AML program; (2) that Habitat's AML Program is updated as necessary; and (3) that all non-construction employees and designated volunteers receive training on AML requirements before conducting business on behalf of Habitat and, thereafter, on an ongoing basis as needed.

The Compliance Officer will report directly to the Board of Directors of Montcalm County Habitat for Humanity.

Montcalm County Habitat for Humanity

124 W. Grove Street, PO Box 681

Greenville, MI 48838

DESIGNATION OF AML COMPLIANCE OFFICER

Compliance Officer: Brian Greene

Approved by Bill Ferrentino, President *Signature:* _____ *Date* _____

B. Compliance Officer Duties and Responsibilities

The duties and responsibilities of the Compliance Officer include, but are not limited to, the following:

- Maintain a thorough knowledge of all state and federal statutes pertaining to anti-money laundering with respect to Habitat's operations, including OFAC requirements and detecting and addressing Red Flags and SAR requirements.
- Supervise the development and periodic updating of policies and procedures related to compliance with all applicable federal and state statutes regarding anti-money laundering and related requirements.
- Supervise the execution of an AML/BSA/OFAC risk assessment within a regular 18 month cycle and more frequently if circumstances dictate.
- Schedule and coordinate annual employee training seminars regarding anti-money laundering and related requirements.
- Supervise the development of training procedures to ensure compliance with the applicable state and federal statutes regarding anti-money laundering and related requirements.
- Supervise the proper completion, timely submission, and complete and accurate recordkeeping with respect to government filings pertaining to anti-money laundering and related requirements, including but not limited to Suspicious Activity Reports ("SARs"), which are filed with FinCEN.
- Serve as liaison with law enforcement and regulatory agencies regarding matters of compliance/examinations/reports pertaining to anti-money laundering and related requirements.
- Supervise the monitoring of statutory examinations conducted by any government agency pertaining to anti-money laundering and related requirements.
- Supervise the maintenance of a record related to any documents requested by law enforcement and/or regulatory agencies pursuant to subpoena, summons, or other administrative or court documents pertaining to anti-money laundering or related requirements.
- Cooperate with periodic Independent Audits of the AML program (see Section X below).

IV. Risk Assessment

The development and implementation of an effective AML Program must be based on a risk assessment. For this reason, Habitat is required to conduct an AML/BSA/OFAC risk assessment of its business, customers, products, and the geographic location in which it operates, in accordance with a standard risk assessment methodology.

The Compliance Officer must determine the AML vulnerabilities of Habitat's products/services, the AML risks associated with the geographies in which it operates, and the AML risks of the customers with whom it deals. The Compliance Officer must also assess the effectiveness of Habitat's controls to manage and mitigate the AML risks. The selection of risk categories and the weights given to risk categories in a money laundering risk assessment vary depending on the circumstances.

In order to provide a framework for identifying AML risks, the Compliance Officer shall conduct a money laundering risk assessment by first determining inherent money laundering risk, then reviewing mitigating controls, and in consideration of the inherent risk and mitigating controls, determine the overall residual money laundering risk. The results of the risk assessment and any recommendations for control improvements must be provided to senior management for review and approval. Results of the money laundering risk assessment, the methodology, the analysis, and any supporting documentation of each will be maintained for at least three years.

Habitat's money laundering risk assessments must be updated on a regular basis, generally at least every 18 months. Habitat's AML/BSA/OFAC risk assessment must also be updated whenever material changes occur to products, services, customers or geographies that would materially impact the risk assessment. Any new product or sales activity or new line of business must undergo an AML risk assessment as described in this Section.

V. Checking Office of Foreign Assets Control ("OFAC") Lists

Habitat must comply with Office of Foreign Assets Control ("OFAC") regulations, which prohibit transactions involving certain individuals, entities, or countries that are subject to sanctions or other special concerns. In connection with mortgage loan origination and lending activity (including but not limited to: accepting mortgage loan applications, processing mortgage loan applications and closing mortgage loans), we will routinely check to ensure that a customer does not appear on the United States Department of the Treasury's OFAC Specifically Designated Nationals and Blocked Persons List (the "SDN List") and is not from, or engaging in transactions with people or entities from, countries and regions subject to economic sanctions or embargo that are listed on the OFAC website (*see* www.treas.gov/offices/enforcement/ofac/sdn/index.html). We will regularly check the list and subscribe to receive updates when they occur. We may, if deemed necessary by the Compliance Officer and concurred in by the Board, access these lists through various software programs to ensure speed and accuracy.

If there is no potential match with the OFAC lists, the transaction may proceed. If, however, our checking indicates a potential match, we will perform additional due diligence to ascertain whether the match is actual or a false positive vis-à-vis the name on the OFAC lists.

In the event that we determine a customer, or someone for whom the customer is transacting, is on the SDN List, or is from or engaging in transactions with a person or entity located in an embargoed or sanctioned country, we will reject the transaction or block the customer's assets, as appropriate under OFAC regulations, and file a blocked assets or rejected transaction form with OFAC. We may also call the OFAC Hotline: 1-800-540-6322.

As part of Habitat's SAR filing process (which is described in Section VIII.A. below), any blocking reports sent to OFAC will be reviewed to determine whether anything contained therein constitutes suspicious activity. Not all transactions, accounts, or customers identified in a blocking report constitute suspicious activities that require the filing of a SAR.

VI. Customer Identification and Verification

Habitat will collect certain minimum customer identification information from each mortgage loan applicant and compare customer identification information with government-provided lists of suspected terrorists as mentioned above in Section V.

A. Required Customer Information – Minimum ID Requirements

Prior to engaging in any activity which potentially may involve money laundering, Habitat will collect the following information for all customers:

- **Name**
- **Address** (residential or business street address for an individual; for armed services personnel, an Army Post Office ("APO") or Fleet Post Office ("FPO") number). If necessary, address will be confirmed by a current utility bill mailed to the customer at the address in question.
- **Date of Birth** (verifiable via an unexpired government-issued identification evidencing nationality or residence and bearing a photograph or similar safeguard, such as a government-issued passport or driver's license)
- **Government-issued identification number**, which will be a Social Security number or other taxpayer identification number (for U.S. persons) or one or more of the following: passport number and country of issuance, alien identification card number or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or other similar safeguard (for non-U.S. persons). All such documents must be unexpired. We will refuse any transaction in the event that a customer has applied for, but has not received a taxpayer identification number and cannot prove his/her identity to our satisfaction.

B. Customers Who Refuse To Provide Information

If any customers have questions regarding the necessity of providing identification, we will inform them it is required by federal regulations. If, however, a potential or existing customer **refuses to provide the information** described above when requested, or appears to have intentionally provided misleading information, **we will not complete the transaction** with the customer, and if, after consultation with the Compliance Officer or Designee, it is determined to be required, Habitat will file a SAR.

C. Verification of Information

To the extent reasonable and practicable, at the time a customer relationship is established, Habitat will ensure, based on our assessment of the AML-related risks posed by the customer's location, nationality, and overall profile, that we have sufficient information to form a reasonable belief that we know the true identity of our customers. In verifying customer identity, we will analyze any logical inconsistencies in the information we obtain such as through documentary evidence.

suspicious activities to the appropriate authorities. We will create employee guidelines with examples of suspicious money laundering activity and conduct an appropriate investigation before a SAR is filed.

A. Detecting Red Flags

Red Flags can arise at any time, including during the application process and throughout the customer relationship. An individual red flag can be business- or industry-specific or can apply more broadly to all businesses and industries in which our customers are active. Various governmental and quasi-governmental web sites, both domestic and international, contain lists of red flags. Examples include the OECD's Financial Action Task Force, www.fatf-gafi.org, and the Federal Financial Institutions Examination Council, www.ffiec.gov/bsa.

Red Flags that signal possible money laundering include, but are not limited to:

- The customer exhibits unusual concern about Habitat's compliance with government reporting requirements and Habitat's AML policies (particularly concerning his or her identity or type of business), or is reluctant or refuses to reveal any information concerning business activities, or furnishes unusual or suspicious identification or documents.
- A fraud or activity alert is included with a consumer report obtained with respect to the consumer.
- A consumer reporting agency provides a notice of credit freeze in response to a request for a credit report.
- A consumer reporting agency provides a notice of address discrepancy.
- The customer wishes to engage in a transaction that appears to lack sense.
- The information provided by the customer that identifies a legitimate source for funds is false, misleading, or substantially incorrect.
- Upon request, the customer refuses to identify or fails to indicate any legitimate source for his or her funds and other assets.
- The customer (or a person publicly associated with the customer) has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The customer exhibits a lack of concern regarding transaction costs.
- The customer has difficulty describing the nature of his or her business.
- The customer asks for exemptions from Habitat's AML policies.
- The customer requests that a transaction be processed to avoid Habitat's normal documentation requirements.

Habitat's unique mortgage products and practices greatly reduce the likelihood of mortgage fraud occurring. Red Flags that signal possible mortgage fraud in the broader mortgage industry include, but are not limited to:

- The customer appears to be acting as an agent for an undisclosed principal, but declines or is reluctant, without legitimate reasons, to provide information or is otherwise evasive regarding that person or entity.
- Title to the subject property is held by virtue of an unrecorded deed.
- A loan on the proposed security property was recently paid off.
- The proposed sale is occurring within a year of obtaining title.
- The real estate sales contract provides for a large seller allowance which may signal that the allowance is a method for the seller to funnel down payment funds to the buyer.
- The brokers or other agents are receiving excessive commissions.
- The sales price of the property exceeds fair market value.
- A party requests that the loan be used to pay debts not secured by the property or required by the lender to be paid off.
- The file contains more than one contract with significant differences in price.
- The buyer's check indicates another to be the provider of funds and no gift letter is presented.

B. Grand Jury Subpoenas

We understand that the receipt of a grand jury subpoena concerning a customer does not in itself require that we file a SAR. When we receive a grand jury subpoena, we will conduct a risk assessment of the customer subject to the subpoena, as well as review the customer's file and activity. If we uncover suspicious activity during our risk assessment and review, we will elevate that customer's risk assessment and file a SAR in accordance with the SAR filing requirements. We understand that none of our officers, employees, volunteers or agents may directly or indirectly disclose to the person who is the subject of the subpoena its existence, its contents or the information we used to respond to it. To maintain the confidentiality of any grand jury subpoena we receive, we will process and maintain the subpoena by retaining such communications in secure locations. If we file a SAR after receiving a grand jury subpoena, the SAR will not contain any reference to the receipt or existence of the subpoena. The SAR will only contain detailed information about the facts and circumstances of the detected suspicious activity.

C. Responding to Red Flags and Suspicious Activity

When an employee or volunteer of Habitat detects any red flag, he or she will immediately contact the Compliance Officer or Designee to see whether further investigation should be undertaken. Any such investigation would take place only under the direction of the Compliance Officer or Designee and might include gathering additional information internally or from third-party sources, including the applicant. Ultimately, information obtained in such an investigation may lead to the Compliance Officer contacting the government or authorizing the filing of a SAR (see Section VIII, below). SAR logs will be maintained by the Compliance Officer or Designee and will be used to track the auditing of accounts that may be subject to SAR filing. All accounts subject to SAR filing will be documented and will include information such as SAR date, reported dollar amounts, FinCEN submission date, and tracking number used in the SAR Log.

VIII. Suspicious Transactions and BSA Reporting

A. **Filing a SAR**

Habitat will file SARs for any activity conducted or attempted through a Habitat location involving (or in the aggregate) \$5,000 or more of funds where we suspect, or have reason to suspect, that

- the transaction involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity as part of a plan to violate or evade federal law or regulation or to avoid any transaction reporting requirement under federal law or regulation;
- the transaction is designed, whether through structuring or otherwise, to evade the requirements of the BSA regulations;
- the transaction has no apparent business or lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and, after examining the background, possible purpose of the transaction, and other facts, we have found no reasonable explanation for the transaction; or
- the transaction involves the use of Habitat to facilitate criminal activity.

Habitat will report suspicious transactions by completing a SAR, and we will collect and maintain supporting documentation as required by the BSA regulations. We will file a SAR no later than thirty (30) calendar days after the date of the initial detection of the facts that constitute a basis for filing a SAR. If no suspect is identified on the date of initial detection, we may delay filing the SAR for up to an additional thirty (30) calendar days, or a total of sixty (60) days after the date of initial detection of the facts, pending identification of a suspect.

We will retain copies of any SAR filed and any supporting documentation for at least five (5) years from the date of filing. We will identify and maintain supporting documentation and make such information available to FinCEN, any other appropriate law enforcement agencies, or federal or state regulators, upon request.

B. **SAR Confidentiality**

Habitat will maintain as **strictly confidential** any SAR and its supporting documentation. **We will NOT notify any person involved in the transaction that the transaction has been reported**, except as permitted by the BSA regulations. In general, disclosure of the fact that a SAR filing is contemplated or has been made is a violation of federal law. Any Habitat employee or volunteer who is subpoenaed or required to disclose a SAR or the information contained in the SAR will report the existence of that subpoena or requirement immediately to the Compliance Officer and **prior** to disclosure of the SAR or the information contained in the SAR. Except where disclosure is requested by FinCEN or other appropriate law enforcement or regulatory authority, as determined by the Compliance Officer, Habitat and the employee will decline to produce the SAR or to provide any information that would disclose that a SAR was prepared or filed.

C. **Maintaining SARs**

Every SAR and copies of any supporting documentation will be maintained separately from all other books and records of HABITAT in order to avoid inadvertent disclosure of SAR filings. Every SAR and copies of any supporting documentation will be kept in a secure location. As noted above, the Compliance Officer or Designee will handle all subpoenas or other requests for SAR information.

The Compliance Officer or Designee will be responsible to ensure that AML records are maintained properly and that any SARs are filed as required.

D. Records Required

Habitat will create and maintain SARs and relevant documentation on customer identity and verification as part of Habitat's overall AML compliance program. We will also maintain required records related to customers listed on the OFAC list. We will maintain all BSA-related records and their documentation for at least five (5) years.

IX. Training Programs

Under the leadership of the Compliance Officer, we will develop and provide ongoing training of our employees and any volunteers who perform administrative duties. Training will occur on at least an annual basis. The training offered will include, at a minimum, the following:

- How to identify "red flags" and signs of money laundering;
- What to do after the risk is identified;
- The employee's role in Habitat's compliance efforts;
- Habitat's record retention policy related to AML compliance; and
- Disciplinary consequences (including civil and criminal penalties) for non-compliance with the BSA.

The training program offered will include maintenance of records to indicate which persons received training, the dates of training, and the subject matter of the training.

Training may also include educational pamphlets, videos, intranet systems, in-person training, and explanatory memos, as necessary to effectuate full compliance with AML laws and regulations and Habitat policy.

New hire non-construction employees/volunteers shall receive AML training within 30-days of commencing employment with Habitat.

Periodically, we will review our operations to see if certain employees or volunteers require specialized additional training. For example, we may offer additional or refresher training to employees returning from leaves of absence (including family medical, maternity, and military) as needed upon their return to work. Our written procedures will be updated to reflect any such changes.

X. Independent Audit of AML Program

Independent testing of our AML program will be performed by an outside, independent, qualified third-party or internally by a qualified member of our staff who is totally independent from Habitat's AML compliance team. If an outside party is chosen, we will conduct the necessary due diligence to select the company that will perform the audit. The independent testing will test compliance with this Policy, the BSA/AML regulations and SAR requirements and will include a review of:

- How suspicious activity is monitored and identified;

- Whether all identified suspicious activity was reviewed and appropriately handled; and
- Whether suspicious activity was properly reported.

Upon completion of the audit, the auditor will issue a report of all findings to the Compliance Officer, and that report will be shared with Habitat's senior management and board of directors. Habitat will address and respond to each of the resulting recommendations.

XI. Vendor Management

At this time, Habitat utilizes outsourcing arrangements relating to, among other things, [OFAC, CIP, employment and occupancy screening and additional services as necessary, including loan servicing]. Habitat understands it cannot contract out its regulatory responsibilities and therefore remains responsible for the anti-money laundering systems and controls in relation to the activities outsourced.

In all instances of outsourcing, Habitat bears the ultimate responsibility for the duties undertaken in its name. Therefore, Habitat will take the following steps to ensure the service provider performs its activities in accordance with reasonable policies and procedures designed to detect, prevent, and mitigate the risk of money laundering, terrorist financing or other crimes, such as mortgage fraud: (a) require, by contract, that service providers have policies and procedures designed to detect, prevent, and mitigate the risk of money laundering, terrorist financing or other crimes, such as mortgage fraud; and (b) require, by contract, that service providers review Habitat's AML Policy and Program Procedures and report any Red Flags to the Compliance Officer or Designee.

XII. Monitoring Employee Transactions

Employee's transactions will be subject to the same AML policies and procedures as are applicable to non-employee customers.

XIII. Additional Areas of Risk

Habitat will periodically review all areas of its business to identify potential money laundering risks, terrorist activity or terrorism financing risks, and risks of other criminal activity, including mortgage fraud, that may not be covered in the program described above and will continually work to improve its AML compliance program.

XIV. Board Approval

[EACH BOARD MEMBER MUST SIGN BELOW (ADD ADDITIONAL SIGNATURE BLOCKS AS NEEDED). – OR – IN LIEU OF SIGNATURES, AFFILIATE WILL NEED A BOARD RESOLUTION WHICH INCLUDES LANGUAGE STATING THAT ALL BOARD MEMBERS HAVE REVIEWED AND APPROVED THE POLICY.]

By signing below, each board member approves this AML program as reasonably designed to achieve and monitor Habitat's ongoing compliance with the requirements of the Bank Secrecy Act, the USA PATRIOT Act, and FinCEN's Anti-Money Laundering Program and Suspicious Activity Report Filing Requirements for Residential Mortgage Lenders and Originators and the implementing regulations under it.

Signed: _____
Name: _____

Date: _____

The customer's identity will be verified using the information set forth in Section VI.A. above. We are not required to take steps to determine whether any document that the customer has provided to us for identity verification has been validly issued, and we may rely on a government-issued identification as verification of a customer's identity. However, if we detect that the document evidences some form of fraud or other irregularities, we will consider that factor in determining whether we can form a reasonable belief that we know the customer's true identity.

If a customer's identity cannot successfully be validated based on the information in Habitat's possession, Habitat may, in its sole discretion, contact the customer and request that the customer provide via facsimile (i) a true and correct copy of the customer's unexpired, government-issued identification card with photograph, and (ii) a copy of any current utility bill where the name and mailing address on the bill match the information provided by the customer.

If we find information that indicates possible suspicious activity such as money laundering, terrorist financing activity, or other criminal activity, including mortgage fraud, we will, after consultation with the Compliance Officer or Designee, file a SAR, if that is deemed necessary or appropriate by the Compliance Officer or Designee.

D. Lack of Verification

When we cannot form a reasonable belief that we know the true identity of a customer with respect to transactions requiring customer identification, we will do the following: (i) not perform the transaction; and (ii) if deemed necessary or appropriate by the Compliance Officer or Designee, file a SAR.

E. Recordkeeping

We will document our verification, including all identifying information provided by a customer, the methods used and results of verification, and the resolution of any discrepancy in the identifying information. We will maintain records confidentially containing a description of any document that we relied on to verify a customer's identity, noting the type of document, any identification number contained in the document, the place of issuance, the date of issuance, if any, and expiration date. **These records must be retained for at least five (5) years** following termination of the customer relationship or dormancy of an account. All such records may be retained in electronic form.

F. Comparison with Government Provided Lists of Terrorists, Other Criminals and Debarred or Excluded Individuals

Habitat may receive notice that a federal government agency has issued a list of known or suspected terrorists. Within a reasonable period of time after receipt, we will determine whether a customer appears on any such list of known or suspected terrorists or terrorist organizations issued by any federal government agency and designated as such by U.S. Department of the Treasury. We will follow all federal directives issued in connection with such lists.

We will continue to comply with OFAC rules prohibiting transactions with certain foreign countries or their nationals as mentioned in Section V.

VII. Monitoring for Suspicious Activity

We will monitor a sufficient amount of mortgage loan origination activity to permit identification of suspicious activity, such as the "red flags" identified in Section VII. A. below. The Compliance Officer or Designee will be responsible for this monitoring, will document when and how it is carried out, and will report