



Office of Foreign Assets Control Questionnaire

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

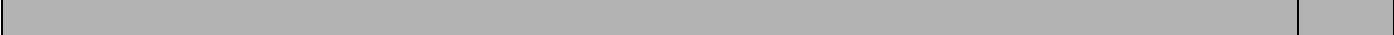
**OFAC Questionnaire**


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



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9. Did the FI submit an annual report of the blocked property by September 30?	Yes
10. Does the FI have an OFAC compliance audit at least annually?	Yes
11. Does the FI have an OFAC scanning process?	YES, Comerica scans both incoming and outgoing wire activity against the OFAC/SDN/PLC/FSE/SSI & EO 13599 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.



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<b>Title:</b>	Director, AML Compliance
<b>Signature:</b>	
<b>Date:</b>	4/21/2017