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From: Craig Jones [cjones@gatewaysavingsbank.com]
Sent: Tuesday, March 14, 2006 12:08 PM
To: Comments, Regulation; infocollection.comments@ots.treas.gov
Subject: Revised SAR by Depository Institution

I'm responding to "Attention: 1506-0001, Revised Suspicious Activity Report by Depository Institution" published in the Federal Register/Vol.71, No. 33/Friday, February 17, 2006/ Notices pages 8640-8648 and this response is being generated in my capacity as this Organization's Bank Secrecy Act Officer.

The approach being taken is supported. I like getting Subject Information and basis description of the concern on the first page in Parts I & II. Also, I like getting all reporting organization information on a single page 2. However, Page 2 Part IV Contact for Assistance, should, in my view, be expanded to allow for more data specifically describing the party preparing the SAR along the lines of Part IV, Page 2 of the Current SAR. The way this is now drafted, that specific contact data isn't provided and I would think the ability of law enforcement and/or financial regulators to go directly to the responsible party would be very important to the investigative process. Also, such direct contact ability could eliminated an inadvertent SAR confidentiality breach as the telephone inquirer may have to make an unauthorized disclosure of the nature of his inquiry and, maybe getting shuffled around some, before they would reach the correct party. Such specific contact data would become even more important when two separate organizations are filing on the same subject(s) and event(s), which I surmise is being encouraged via the creation of this revised form. Maybe the contact data should also include a preparer only known and disclosed verification code so that the inquiring party knows that they have, in fact, contacted the correct and authorized party to visit with about the SARs, and the party being contacted knows that the inquiry is not bogus.

I have found the Part V Narrative section inadequate in the current form (too small an area provided and a difficult process to create additional continuation pages). The proposed form is an improvement, in that a larger area is provided, but I feel this area in Page 3 needs to be expanded to selectively flow to one or more continuation pages. Perhaps even the top of page 3, Part V preprinted data should be move to the beginning of the SAR Report Instructions section. I would recommend the pages in the report itself be numbered in sequence and the instruction pages be labeled a, b, c., etc., to make it clear these are not actually part of the report, but only instructional materials.

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