



# GENERAL BULLETIN

CONNECTICUT  
BANKERS  
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SENT TO:

2010 – 21

February 9, 2010

TO THE CHIEF EXECUTIVE OFFICER  
OR INDIVIDUAL ADDRESSED

CEO, CEO+, COO, Audit,  
Compliance & Training  
Specialists

**RE: CBA Web Seminar – Summons, Subpoenas & Administrative Requests: Developing Procedures For Processing Government Demands For Customer Information**  
**Tuesday, March 2, 2010 -- 2:30 p.m. - 4:30 p.m.**

Financial institutions routinely process demands for customer information from third parties. Mishandling a claim can subject the bank to liability, either to the claimant, the customer or to contempt of court proceedings. Interagency Advisories distributed in 1998 and 2004, have directed U.S. financial institutions to develop processes for handling requests of sensitive information and private law suits regarding suspicious activities. This web seminar focuses on developing written policies and procedures for dealing with third party demands for customer information. Program materials contain sample procedures.

## **HIGHLIGHTS**

- How to centralize demand processing
- Searching for customer relationships
- Handling variations in names and identifying numbers
- Handling "informal" government requests for information
- Requesting additional information or clarification from the demanding party
- Federal Right to Financial Privacy Act
- IRS Summons
- National Security Letters
- Grand jury subpoenas
- Requests for SARs and related information
- Informal law enforcement requests for information

## **WHY ATTEND?**

A bank should be consistent in handling demands regardless of the source. It should develop records that clearly indicate when the demand was received and to whom it was delivered for processing along with specific procedures for providing notice to customers when appropriate. (It should also have specific safeguards if notification is not appropriate.) After the fact, the bank should be able to demonstrate what documents were delivered to the requesting party or official. This program helps attendees develop a demonstrable, consistent process. It does not focus on the law of any state. It uses the IRS summons process, one that applies to all U.S. financial institutions, as an example. Using IRS summons allows you to build your process around a common third party demand. You can adapt that process to meet the requirements used by your state courts and other common requests.

### AUDIENCE

Operations officers and auditors - specifically, those responsible for handling third party claims for customer information including processing and providing notices to customers. The program does not address the laws of a particular state or deal with requests for customer funds. **CE Applied:** 2.5 hours towards the CRCM designations with the Institute of Certified Bankers, an affiliate of the American Bankers Association.

### SPEAKER

Ken Gollhofer is a principal with Pegasus Educational Services, LLC. He is an experienced banker with a unique ability to reduce complex legal concepts to plain English. Prior to becoming a full-time trainer, Ken was a community banker and General Counsel for a regional consulting firm for financial institutions. He has served on Compliance Schools sponsored by the OTS and the FDIC, and he has presented banking schools and seminars in over 25 states.

### WHAT IS A WEB SEMINAR?

A web seminar is an enhanced telephone seminar. The audio portion is delivered by speaker phone. However, you may now view a corresponding PowerPoint presentation using a PC or PC connected to an A/V projector. No special hardware is needed. You may still participate by phone only. The program consists of 90 minutes of instruction and 30 minutes live Q&A. Each registration provides one connection to the web seminar, materials and 30 days access to the online seminar. You may have unlimited listeners on your connection by speaker phone and PC. You will receive a confirmation with your PIN, materials and instructions. If you do not receive a confirmation within two days of the event call 888-262-7701. You may also purchase the CD and materials.

Free 30-Day Replay - Within five working days after the broadcast, you will receive a URL providing unlimited access to a recorded copy of the presentation for 30 days. This enables you to participate in the live web seminar, train additional staff and review the material as needed.

Transmission, retransmission or republishing of the audio portion of the web seminar is prohibited. Your registration entitles you to one connection at one location with permission to make copies of materials for participants. Please complete one registration per location.

The **On-Demand Web Seminar** is a live web seminar that has been recorded and then streamed to your computer to watch at your convenience. The program can be viewed anytime 24/7. You can watch a portion, come back and pick up where you left off! Anyone at your branch may access the program from a computer using the login and password. When purchasing an On-Demand Web Seminar, you have unlimited access to the program for 6 months from the date of purchase.

### REGISTRATION INFORMATION

Registrations are requested to be submitted three days prior to the date of the web seminar. On-line registrations can be made at <http://www.bankersed.com/CTBANKERS/>. For all other registrations, please complete the attached registration form and send directly to Bankers Ed in advance of the program. Fee information for this program is listed on the registration form. **Payment is expected at the time of registration unless other arrangements are made prior to the event with the CBA.**

**Late Registration:** Registrations are accepted until the program starts. To ensure timely delivery of materials, etc., please register online when registering **two working days prior** to the broadcast (credit cards, e-checks and invoices accepted). If you would like assistance with online registration, contact 888-262-7701.

Please do not hesitate to contact either Kathy Parks or me if you have any questions about this web seminar.

Very truly yours,

LINDSEY R. PINKHAM  
Senior Vice President & Secretary

attachment

**CBA WEB SEMINAR**

**SUMMONS, SUBPOENAS & ADMINISTRATIVE REQUESTS**

**Tuesday, March 2, 2010**

**2:30 p.m. - 4:30 p.m. (EST)**

**REGISTER** (Each registration entitles you to one connection at one location where an unlimited number of listeners may participate):

Name \_\_\_\_\_ Title \_\_\_\_\_

Company \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Phone \_\_\_\_\_ Fax \_\_\_\_\_ E-mail \_\_\_\_\_

**FOUR WAYS TO REGISTER FOR CBA WEB SEMINARS:**

**Prior to February 22<sup>nd</sup>**

Mail: Complete this form, include payment and **mail it to:** Bankers Ed: 5700 S. Mopac, #C310, Austin, TX 78749

**Anytime Prior to the Program**

On-line: Register on-line at <http://www.bankersed.com/CTBANKERS/>

Fax: Complete the registration and credit card information below and fax to: 512-381-1571

Phone: Call 888-262-7701 with credit card information

**CBA WEB SEMINAR – SUMMONS, SUBPOENAS & ADMINISTRATIVE REQUESTS**

**Tuesday, March 2, 2010 - (Seminar code: SW2-1126)**

Web Seminar/Materials (live hookup)  \$255 member  \$510 non-member

On-Demand Web Seminar/Materials  \$275 member  \$550 non-member

**METHOD OF PAYMENT** (check one):

**Check made payable to: Bankers Ed**

Discover Card

MasterCard

Visa

AMEX

Card Number \_\_\_\_\_

Exp. Date \_\_\_\_\_

Security Code (3 or 4 digits on back of card) \_\_\_\_\_

Signature \_\_\_\_\_

Amount \$ \_\_\_\_\_

For registration questions, please contact Bankers Ed customer support at 888-262-7701 or Kathy Parks at the Connecticut Bankers Association parks@ctbank.com at 860-677-5060.

**\*\*\*Registrations must be sent to Bankers Ed\*\*\***

(Seminar code: SW2-1126)