

## **Regulation GG - PROHIBITION ON FUNDING OF UNLAWFUL INTERNET GAMBLING**

Changes Effective December 1, 2009

DBS is aware of the upcoming Reg. GG changes effective December 1, 2009. There is a form, Certification Regarding Internet Gambling [CRIG], that is available from Wolters Kluwer that will be generated in the commercial deposit, savings, and CD products. There will be a question to determine if the customer is or is not operating as an Internet gambling business. If not, the Certification Regarding Internet Gambling will be generated for the customer to sign stating that it does not engage in Internet gambling. If the customer will operate as an Internet gambling business, evidence of their legal authority must be obtained. This will be noted in the forms from an outside source as a reminder to obtain this evidence. Also, the Terms and Conditions forms were updated by WKFS and include the Unlawful Internet Gambling Notice. The Signature Cards are being revised and will remove the Terms and Conditions from the back. When this is implemented into CoPilot, the Terms and Conditions will automatically generate for all accounts. We expect to have this out the last week of November.

From WKFS - Certification Regarding Internet Gambling [CRIG]:

Compliance Services has created a new form, the CRIG. Reg. GG, 12 CFR 233.1, et seq., effective December 1, 2009, requires depositories to establish and implement policies and procedures to stop the flow of funds involved in unlawful Internet gambling and provides nonexclusive examples of policies and procedures that will be considered satisfactory. All of the examples include the obtaining of a certification that a business with whom the depository has an account relationship does not engage in an unlawful Internet gambling business.