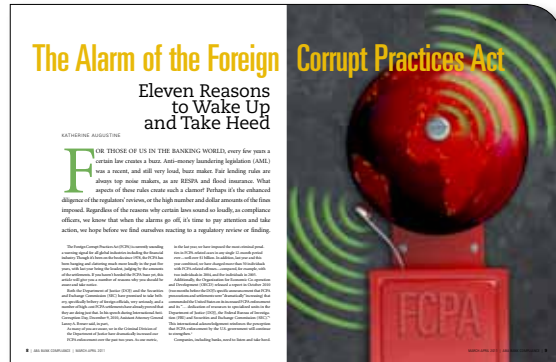


8 | The Alarm of the Foreign Corrupt Practices Act 11 Reasons to Wake Up and Take Heed

The Foreign Corrupt Practices Act (FCPA) has been banging and clattering much more loudly in the past five years, with last year being the loudest if you judge by the amounts of the settlements. This article will give you a number of reasons why you should take notice.

BY KATHERINE AUGUSTINE



16 | Remote Deposit Capture: RDC is Like a Box of Chocolates

Remote deposit capture (RDC) allows a bank to receive digital information from deposit documents electronically captured at remote locations. But in Forrest Gump's mother's words, it's a little like that box of chocolates. You never know what you're going to get.

BY PATTI BLENDEN



22 | REFORM SERIES Making Sense of Mortgage Originator Compensation Rules

Preparing for regulatory reform is challenging and frustrating due to the apparent overlap between the Dodd-Frank Act and proposals and final rules recently issued by the Federal Reserve Board (FRB). One major example is the Dodd-Frank Act standards and FRB rules governing mortgage originator compensation practices.

MICHAEL BRAUNEIS, CRCM



COLUMNS

4 | Compliance Management

BY CARL G. PRY, CRCM

6 | Regulatory Insider

BY BONITA G. JONES

28 | The Other Side

BY STU LEHR, CRCM

DEPARTMENTS

30 | Regulatory Developments Table: 2010 Year in Review

34 | ABA Resources

36 | Continuing Education Quiz

PUBLISHER

Laurence Price
(202) 663-5378
lprice@aba.com

SENIOR EDITOR

Joseph M. Kelly
(202) 663-5071
jkelly@aba.com

ART DIRECTION

BonoTom Studio, Inc.
studio@bonotom.com

ADVERTISING SALES

Dave Bayard
(973) 822-9275
dave@bayard.com

WEB SITES

www.aba.com/bankcompliance
http://magazines.aba.com/bcmag
http://magazines.aba.com/bcnl

MAILING ADDRESS

Address all articles, letters, and other correspondence to:
ABA Bank Compliance
American Bankers Association
1120 Connecticut Avenue, N.W.
Washington, DC 20036-3971

SUBSCRIPTIONS

For information about your subscription, or to subscribe, call ABA Customer Service at (800) BANKERS or (202) 663-5087; or fax to (202) 663-7543.

\$300—ABA Member Price*
\$450—Nonmember Price*

2–5subscriptions—save 15%
6–10subscriptions—save 25%
11–20subscriptions—save 35%
21–25subscriptions—save 45%
26+subscriptions—save 50%

SINGLE/BACK ISSUES

\$50—ABA Member Price**
\$75—Nonmember Price**

*AL, AZ, CA, CO, DC, FL, GA, HI, IL, IN, KY, MA, MI, MO, NC, NJ, NY, OH, PA, RI, SC, TN, TX, UT, WA, WI, WV, and WY residents add appropriate sales tax.

†Issues older than six months are half price.

REPRINTS

Article reprints are available in quantities of 25 or more. For more information, contact Ashley Zander at The YGS Group at (800) 494-9051, ext.125.

POSTMASTER

Send address changes to:
ABA Bank Compliance
American Bankers Association
1120 Connecticut Avenue, N.W.
Washington, DC 20036-3971

Periodicals Postage Paid at Washington, DC and additional mailing offices.
Printed in the USA.

ABA Bank Compliance

Editorial Advisory Board

CHAIR

Karen Davy Wright, CRCM
Executive Director—Compliance
JPMorgan Chase Bank
Houston, Texas

MEMBERS

Maureen E. Carollo, CRCM
Vice President Compliance
and BSA Officer
NBC Bank
Oklahoma City, Okla.

Kathleen M. Curtis, CRCM
Vice President/Compliance
and IT Officer
Capital Bank, NA
Rockville, Md.

William (Wylli) Foote, CRCM
Director of Operations
TCA, Inc
Chicago, Ill.

Rick Freer, NBE

Senior Compliance Specialist
Compliance Policy
Office of the Comptroller
of the Currency
Washington, D.C.

Michalene Johnson, CRCM

Vice President
Bank of America
Providence, R.I.

Bonita G. Jones

President
Bonita Jones & Associates, LLC
San Francisco, Calif.

Nancy Justice, CRCM

Vice President, Compliance
Central Bancompany
Jefferson City, Mo.

Pat Shutterly

AML Audit Director
Capital One Audit Services
CapitalOne Corp.
Richmond, Va.

Maureen Prentice

Compliance Officer
Logansport Savings Bank
Logansport, Ind.

Carl G. Pry, CRCM, CRP

Senior Vice President and
Compliance Manager
Compliance & Control
KeyBank
Cleveland, Ohio

Meg Sczyrba, CRCM, CRP

Director of Global Credit and
Regulatory Support
PayPal
San Jose, Calif.

COPYRIGHT

Copyright ©2011 by American Bankers Association. All Rights Reserved. No portion of this publication may be stored or reproduced in any form without permission. Copyright requests should be made in writing to Jill Goldman at the following address: American Bankers Association, 1120 Connecticut Avenue, N.W., Washington, DC 20036-3971; fax to (202) 828-4548; or e-mail to jgoldman@aba.com. ABA Bank Compliance (ISSN 0887-0187) is a product of ABA's Center for Regulatory Compliance. ABA Bank Compliance is published bimonthly.

“This publication is designed to provide accurate and authoritative information in regard to the subject matter covered. It is sold with the understanding that the publisher is not engaged in rendering legal, accounting, or other professional service. If legal advice or other expert assistance is required, the services of a competent professional person should be sought.”

—From a Declaration of Principles jointly adopted by a Committee of the American Bar Association and a Committee of Publishers and Associations.

Are You a Certified Regulatory Compliance Manager (CRCM)?

Increase your value to your employers and earn recognition from your peers. The CRCM designation demonstrates your knowledge and expertise in bank compliance. Learn more about the professional and educational experience requirements, as well as the benefits by calling 1-800-BANKERS or visiting

www.aba.com/icb/crcm.