



RACS4	Must include at least 1txn of at least \$1,000, cumulative amount at least \$10,000. Runs weekly.
RACS4Neg	Must include at least 1 txn between \$1 and \$1000, cumulative amount between \$1 and \$10,000. Runs weekly.

In 1Q 2012, there were 2,186 wire transactions involving high risk countries. 1,801 of the 2,186 transactions would have contributed to generating (957) RACS4 and (179) RACS4Neg alerts. And so, approximately 82% of all high risk wires are reviewed. The remaining 385 did not meet RACS4 criteria of transaction amount greater than \$10,000 or RACS4Neg criteria of aggregate amount less than \$10,000.

**RECOMMENDATION**

For RACS4 Rule, recommend broadening transaction amount range to include transactions with a minimum aggregated amount from \$10,000 to \$7,000. Also, for RACS4Neg rule, recommend increasing maximum transaction amount from \$1,000 to \$2,000 while maintaining a maximum aggregate transaction amount of \$10,000. If these changes were accepted, another 4% of high risk country wires would be reviewed.