FEDERAL DEPOSIT INSURANCE CORPORATION
WASHINGTON, D.C.
and

STATE OF FLORIDA
OFFICE OF FINANCIAL REGULATION
TALLAHASSEE, FLORIDA

In the Matter of INTERNATIONAL FINANCE BANK MIAMI, FLORIDA (Insured State Nonmember Bank)	)	CONSENT ORDER FDIC-14-0315b OFR 55539-FI

The Federal Deposit Insurance Corporation ("FDIC") is the appropriate Federal banking agency for International Finance Bank, Miami, Florida ("Bank"), under section 3(q) of the Federal Deposit Insurance Act ("Act"), 12 U.S.C. § 1813(q).

The Bank, by and through its duly elected and acting Board of Directors ("Board"), has executed a "STIPULATION AND CONSENT TO THE ISSUANCE OF A CONSENT ORDER" ("CONSENT AGREEMENT"), dated October 28, 2014, that is accepted by the FDIC and the Florida Office of Financial Regulation ("OFR"). With the CONSENT AGREEMENT, the Bank has consented, without admitting or denying any charges of unsafe or unsound banking practices or violations of law or regulation related to weaknesses in the Bank's compliance with the Bank Secrecy Act, 31 U.S.C. §5311 et seq., 12 U.S.C. §1829b and 12 U.S.C. §§1951-1959, and its implementing regulations, 31 C.F.R. Chapter X and 12 C.F.R. Part 353, and 12 U.S.C. 1818(s) and its implementing regulation, 12 C.F.R. §326.8 (collectively referred to as "BSA"), and Section 655.50, Florida Statutes, to the issuance of this Consent Order ("ORDER") by the FDIC and the OFR. The OFR may issue an ORDER pursuant to Chapter 120 and Section 655.033, Florida Statutes (2014).

Having determined that the requirements for issuance of an order under section 8(b) of the Act, 12 U.S.C. § 1818(b), and under Chapter 120 and Section 655.033, Florida Statutes, have been satisfied, the FDIC and the OFR hereby order that:

BOARD SUPERVISION

1. (a) As of the effective date of this ORDER, the Board shall increase its supervision and direction of the Bank related to BSA, assuming full responsibility for the approval of sound BSA policies and objectives and for the supervision of all the Bank's BSA activities, consistent with the role and expertise commonly expected for directors of banks of comparable size. The supervision shall include holding meetings no less frequently than monthly, at which it shall review and approve, at a minimum, programs and practices pertaining to the Bank's BSA compliance, along with respective committee minutes pertaining to these matters. The minutes of the Board's meetings shall document these reviews and approvals, including the names of any dissenting directors.

(b) Within 30 days from the effective date of this ORDER, the Board shall establish a Board committee ("BSA Directors' Committee"), consisting of at least three members, to oversee the Bank's compliance with the BSA, the Bank's BSA Compliance Program and the ORDER. A majority of the members of the BSA Directors' Committee shall not be officers of the Bank. The BSA Directors' Committee shall receive from the BSA Officer monthly reports regarding the Bank's implementation of the BSA Compliance Program and compliance with this ORDER. The BSA Directors' Committee shall present a report regarding the Bank's adherence to the BSA Compliance Program and to the ORDER to the Board at each regularly scheduled Board meeting. Such report shall be recorded in appropriate minutes of the Board's meeting and shall be retained in the Bank's records. Establishment of this committee in no way diminishes the responsibility of the Board to ensure compliance with the provisions of the ORDER.

MANAGEMENT

2. The Board shall have and retain management qualified to oversee all aspects of the Bank's BSA Compliance Program, as defined below. Management shall ensure compliance with all applicable laws and regulations that govern BSA compliance. Each member of management involved in BSA activities and compliance shall have the qualifications and experience commensurate with his or her duties and responsibilities related to BSA compliance.

BSA COMPLIANCE PROGRAM

3. Within 90 days from the effective date of this ORDER, the Bank shall develop and submit to the Regional Director of the FDIC's Atlanta Regional Office and the OFR (collectively, "Supervisory Authorities") for non-objection or comment, a written BSA Compliance Program, including policies and procedures, which fully meets all applicable requirements of section 326.8 of the FDIC's Rules and Regulations, 12 C.F.R. § 326.8, and Section 655.50, Florida Statutes, addressing the deficiencies and recommendations contained in the Report of Examination dated May 5, 2014 (the "2014 ROE"), and which is designed to, among other things, ensure and maintain full compliance with the BSA and the rules and regulations issued pursuant thereto. The BSA Compliance Program will also ensure and maintain full compliance with all anti-monetary laundering ("AML") laws,

regulations and rules and those relating to the Office of Foreign Asset Control ("OFAC"). Within 30 days of receipt of the Supervisory Authorities' non-objection or comments and after incorporation and adoption of all comments, the Board shall approve the BSA Compliance Program, which approval shall be recorded in the minutes of the Board meeting. Within 30 days of such Board approval, the Bank shall implement and fully comply with the BSA Compliance Program in a manner acceptable to the Supervisory Authorities, as determined at subsequent examinations or visitations of the Bank.

BSA/AML RISK ASSESSMENT

4. Within 30 days from the effective date of this ORDER, the Bank shall conduct and complete an initial risk assessment of the Bank's BSA operations ("Risk Assessment"), and subsequently shall conduct periodic Risk Assessments no less than annually, consistent with the guidance for risk assessments set forth in the Federal Financial Institutions Examination Council's *Bank Secrecy Act/Anti-Money Laundering Examination Manual* (www.ffiec.gov/bsa_aml_infobase/pages_manual/manual_online.htm) (the "BSA Manual"); and shall establish appropriate written policies, procedures, and processes for the Bank's Risk Assessments within 45 days from the effective date of the ORDER. The Risk Assessment shall address all pertinent risk factors that affect the overall BSA/AML risk profile of the Bank, including the deficiencies and recommendations contained in the 2014 ROE, and ensure that risk ratings are accurate and well supported by qualitative and quantitative data. The Board shall review and approve all Risk Assessments and policies, procedures and processes for the Risk Assessments at the next regularly scheduled Board meeting after completion or establishment, but the

review and approval shall occur no later than 30 days after completion or establishment. Such reviews and approvals shall be noted in the minutes of the Board meetings.

INTERNAL CONTROLS

5. (a) Based on the results of the Risk Assessment, within 90 days from the effective date of this ORDER, the Bank shall develop a revised system of internal controls designed to ensure full compliance with the BSA ("BSA Internal Controls") taking into account its size and risk profile.

(b) At a minimum, the BSA Internal Controls shall include policies, procedures, and processes addressing the deficiencies and recommendations contained in the 2014 ROE and the following areas:

(i) Suspicious Activity Monitoring and Reporting: Taking into account its size and risk profile, the Bank shall develop, adopt and implement policies, procedures, processes, and systems, including automated software monitoring systems, for monitoring, detecting, and reporting suspicious activity being conducted in all areas within or through the Bank. The Bank shall monitor all relevant areas of the Bank for suspicious activity, including, but not limited to: cash transactions, international and domestic wire transfers, and ACH and ATM transactions. The Bank shall cause the timely, accurate and complete filing of Suspicious Activity Reports ("SARs"). The Bank shall require the appropriate level of documentation and support for management's decision to file or not to file a SAR, as required by law;

(ii) Due Diligence: The Bank shall review and enhance its customer due diligence ("CDD") policies, procedures and processes for new and existing customers ("CDD Program"):

(A) the CDD Program shall be consistent with guidance for CDD set forth in the BSA Manual; and

(B) the CDD Program shall operate in conjunction with the Bank's Customer Identification Program ("CIP").

(iii) At a minimum, the CDD Program shall include:

(A) a risk rating system to assess the Bank's customer base to ensure that the risk level of each customer is accurately identified based on the potential for money laundering or other illicit activity posed by the customer's activities. Each risk rating assessment shall take into account the purpose of the account, the anticipated type and volume of account activity, types of products and services offered, and locations and markets served by the customer;

(B) an appropriate level of ongoing monitoring commensurate with the customer's risk level to ensure that the Bank can reasonably detect suspicious activity and accurately determine whether the customer requires enhanced due diligence ("EDD");

(C) a sufficient level of customer information at account opening and appropriate analysis of that information to assist and support the risk rating assigned;

(D) procedures for documenting and supporting the risk analysis conducted under the CDD process, including procedures for validating risk ratings assigned at account opening and resolving issues in the event insufficient or inaccurate information is obtained;

(E) procedures to reasonably ensure the timely identification and accurate reporting to law enforcement and supervisory authorities of known or suspected criminal activity against or involving the Bank, as required by Part 353 of the FDIC's Rules and Regulations, 12 C.F.R. Part 353 ("Part 353").

(iv) Enhanced Customer Due Diligence: The Bank shall establish EDD policies, procedures, and processes to conduct EDD necessary for those categories of customers that the Bank has reason to believe pose a heightened risk of suspicious activity ("EDD Program"), including but not limited to high risk accounts:

(A) the EDD program shall be consistent with the guidance for EDD set forth in the BSA Manual; and

(B) the EDD Program shall operate in conjunction with the Bank's CIP and CDD policies, procedures and processes.

(v) At a minimum, the EDD Program shall include:

(A) procedures to determine the frequency of ongoing reviews based on customer risk level;

(B) procedures to determine the appropriate documentation necessary to conduct and support ongoing reviews and analyses in order to reasonably understand the customer's normal and expected transactions; and

(C) procedures to reasonably ensure the timely identification and accurate reporting to law enforcement and supervisory authorities of known or suspected criminal activity against or involving the Bank, as required by Part 353.

(vi) The policies, procedures and processes that comprise the Bank's BSA Internal Controls shall operate in conjunction with each other and shall be consistent with the guidance for account/transaction monitoring and reporting set forth in the BSA

Manual, including policies, procedures and processes for dissemination of high risk customer lists and information to applicable departments within the Bank.

(c) The BSA Internal Controls shall be submitted to the Supervisory Authorities for non-objection or comment. Within 30 days of receipt of the Supervisory Authorities' non-objection or comments and after incorporation and adoption of all comments, the Board shall approve the BSA Internal Controls, which approval shall be recorded in the minutes of the Board meeting. Within 30 days of such Board approval, the Bank shall implement and fully comply with the BSA Internal Controls.

INDEPENDENT TESTING

6. Within 30 days from the effective date of this ORDER, the Bank shall establish independent testing programs for compliance with the BSA, AML and OFAC rules and regulations, to be performed on no less than an annual basis. The scope of the testing to be performed shall be in writing and reviewed and approved by the Board or its designee. Testing results and recommendations for improvement shall be in writing and shall be approved by the Board within 60 days of completion. Testing procedures shall be consistent with the guidance for independent testing set forth in the BSA Manual and, at a minimum, shall address the deficiencies and recommendations contained in the 2014 ROE and the following:

(a) The overall integrity and effectiveness of the Bank's BSA Compliance Program, including all policies, procedures, and processes;

(b) BSA/AML risk assessment;

(c) BSA reporting and recordkeeping requirements;

(d) CIP implementation;

(e) Adequacy of CDD and EDD policies, procedures, and processes and their compliance with internal requirements;

(f) Adherence by personnel to the Bank's BSA/AML and OFAC policies, procedures and processes;

(g) Appropriate transaction testing, with particular emphasis on high risk operations;

(h) Adequacy of training, including its comprehensiveness, accuracy of materials, training schedule, and attendance tracking;

(i) Management's efforts to resolve violations and deficiencies noted in the previous tests or audits and regulatory examinations;

(j) The overall process for identifying and reporting suspicious activity, including a review of filed or prepared SARs to determine their accuracy, timeliness, completeness, and effectiveness of the Bank's policy; and

(k) Accuracy and completeness of account risk profiles.

BSA STAFF

7. (a) Within 45 days from the effective date of this ORDER, the Bank shall assess its BSA staffing needs to ensure adequate and appropriate BSA staffing resources are in place at all times, the Bank shall develop and implement a written plan of action to develop or recruit and hire additional or replacement personnel with the requisite ability, experience and other qualifications necessary to ensure BSA compliance (the "BSA Staffing Plan"), and the Board shall review and approve the BSA Staffing Plan. The BSA Staffing Plan shall, at a minimum, address the deficiencies and recommendations in the 2014 ROE and include consideration of the Bank's size and growth plans, geographical

areas served, products and services offered, and changes in the BSA/AML and OFAC practices, procedures, rules, and regulations.

(b) Periodically thereafter, but no less often than annually, the Board, or its designee, shall assess its BSA staffing needs to ensure adequate and appropriate BSA staffing resources are in place at all times.

BSA OFFICER

8. Within 30 days from the effective date of this ORDER, the Board shall designate a qualified individual ("BSA Officer"), acceptable to the Supervisory Authorities, with delegated authority and adequate and appropriate resources to implement and enforce BSA compliance, including training. The BSA Officer's qualifications shall be commensurate with the complexity of the Bank's activities and the appointment of the BSA Officer shall conform to the guidance regarding BSA officers set forth in the BSA Manual. The BSA Officer shall provide monthly written reports to the Board regarding the Bank's implementation of the BSA Compliance Program and compliance with the ORDER.

REPORTS

9. The Bank shall ensure that all required BSA reports including Currency Transaction Reports ("CTRs"), SARs, Reports of International Transportation of Currency or Monetary Instruments, Reports of Foreign Bank and Financial Accounts, and any other similar or related reports required by law or regulation are completed accurately and properly filed within required timeframes.

LOOK BACK REVIEW

10. (a) Within 15 days from the effective date of this ORDER, the Bank shall submit the name of a qualified firm, acceptable to the Supervisory Authorities for non-objection, and within 15 days of receipt of such non-objection shall engage the firm, to conduct a review of the following: (i) the 329 accounts identified in the 2014 ROE that were not risk rated in August 2010 and (ii) all other high risk accounts and high risk transaction activity from April 22, 2013 through the effective date of this ORDER, to determine whether suspicious activity involving any accounts or transactions within or through the Bank was properly identified and reported in accordance with the applicable suspicious activity reporting requirements ("Look Back Review"). Suspicious activity shall include, but is not limited to, the circumstances defined in Section 353.3(a) of the FDIC's Rules and Regulations, 12 C.F.R. § 353.3(a).

(b) Within 30 days from the engagement of the review firm and prior to the commencement of the Look Back Review, the Bank shall submit to the Supervisory Authorities a written plan (the "Look Back Review Plan") for approval that sets forth:

(i) The scope of the Look Back Review, including the types of transactions to be reviewed;

(ii) The methodology for conducting the Look Back Review, including any sampling procedures to be followed;

(iii) The expertise and resources devoted to the Look Back Review;

(iv) The anticipated completion date of the Look Back Review; and

(v) A commitment that any interim reports, draft reports or work papers associated with the Look Back Review will be made available to the Supervisory Authorities upon request.

(c) The review firm shall present its findings from the Look Back Review directly to the Board at a Board meeting and the presentation, conclusions and discussion of the findings shall be reflected in the minutes for the meeting.

(d) Within 15 days of receipt of the Supervisory Authorities' non-objection of the Look Back Review Plan, the review firm shall commence the Look Back Review. The Look Back Review shall be completed within 120 days of its commencement. Within 60 days after completion of the Look Back Review, the firm or the Bank shall prepare any additional CTRs and SARs necessary based on the review. Documentation supporting any determination made pursuant to this paragraph shall be retained in the Bank's records for such period of time as may be required by any applicable rules and regulations.

(e) Upon completion of the Look Back Review, the Bank shall submit the findings of the review and the written report to the Board and the Supervisory Authorities and retain copies of any additional SARs and CTRs filed and any other actions taken on the high risk accounts, for review by the Supervisory Authorities at the initial review and at subsequent examinations and/or visitations.

VIOLATIONS OF LAW, REGULATION, AND CONTRAVENTION OF POLICY

11. Within 90 days from the effective date of this ORDER, the Bank will eliminate and/or correct all violations of laws, regulations, and/or contraventions of statements of policy in the 2014 ROE related to BSA and shall adopt and implement appropriate procedures to ensure future compliance with all such applicable federal and state laws,

regulations, and/or statements of policy.

PROGRESS REPORTS

12. Within 45 days from the end of the first quarter following the effective date of this ORDER, and within 30 days from the end of each quarter thereafter, the Bank shall furnish written progress reports to the Supervisory Authorities detailing the form and manner of any actions taken to secure compliance with this ORDER and the results thereof. Such reports may be discontinued when the corrections required by this ORDER have been accomplished and the Supervisory Authorities have released the Bank in writing from making further reports. All progress reports and other written responses to this ORDER shall be reviewed by the Board and made a part of the appropriate Board meeting minutes.

DISCLOSURE TO SHAREHOLDERS

13. Following the issuance of this ORDER, the Bank shall provide to its shareholders or otherwise furnish a description of this ORDER (i) in conjunction with the Bank's next shareholder communication or (ii) in conjunction with its notice or proxy statement preceding the Bank's next shareholder meeting. The description shall fully describe the ORDER in all material respects. The description and any accompanying communication, statement, or notice shall be sent to the FDIC, Division of Risk Management Supervision, Accounting and Securities Disclosure Section, 550 17th Street, N.W., Room F-6066, Washington, D.C. 20429 and to the OFR, Division of Financial Institutions, 200 East Gaines Street, Tallahassee, FL 32399-0371 to review at least twenty (20) days prior to dissemination to shareholders. Any changes requested to be made by the Supervisory

Authorities shall be made prior to dissemination of the description, communication, notice, or statement.

OTHER ACTIONS

14. The provisions of this ORDER shall not bar, stop, or otherwise prevent the FDIC, the OFR, or any other federal or state agency or department from taking any other action against the Bank or any of the Bank's current or former institution-affiliated parties.

This ORDER shall be effective on the date of issuance.

The provisions of this ORDER shall be binding upon the Bank, its institution-affiliated parties, and any successors and assigns thereof.

The provisions of this ORDER shall remain effective and enforceable except to the extent that and until such time as any provision has been modified, terminated, suspended, or set aside by the Supervisory Authorities.

Issued Pursuant to Delegated Authority.

Dated this 4th day of November, 2014.

/s/

By: ______________________________
Michael J. Dean
Acting Regional Director
Division of Risk Management Supervision
Atlanta Region
Federal Deposit Insurance Corporation

The Commissioner of the OFR, having duly approved the foregoing ORDER, and the Bank, through its Board, agree that the issuance of said ORDER by the FDIC shall be binding as between the Bank and the OFR to the same degree and to the same legal effect that such ORDER would be binding if the OFR had issued a separate ORDER that included and incorporated all of the provisions of the foregoing ORDER, pursuant to Chapters 120, 655, and 658, Florida Statutes, including specifically Sections 655.033 and 655.041, Florida Statutes.

Dated this 4th day of November, 2014.

/s/

By: ______________________________

Robert D. Hayes
Director
Division of Financial Institutions
By Delegated Authority for the Commissioner
Office of Financial Regulation