

From: "Baker, Lucy-Ann" <JaniceR@communitybankfl.com> on 03/11/2005 09:31:15 AM

Subject: EGRPRA

Gentlemen:

As requested, we offer comment specifically on the Bank Secrecy Act.

Like all other Florida bankers, we would request clarity and consistency regarding this Act. We have our hesitation in closing long-term accounts due to the perceived BSA risk associated with them. Where are these people going to bank? Examiners make it very clear that these businesses are not going to do business with a bank they have audited. It seems that the Examiners were sent on a mission with little guidance and are making up rules. With the penalties and fines that have been assessed, the penalties appear excessive.

Because we want to do what we think is required, we have spent over \$100,000 to implement software that we hope will be satisfactory to comply with this Act. Each year, the software will require upgrades so the cost continues, plus personnel and overhead.

Are you sure you are doing the right thing?

Robert L. Epling
President
Community Bank of Florida