

FIRMA

Risk Management Training Conference

Monday, March 29, 2010

3:00 – 4:45 pm

Town Hall Session IV

Personal Trust Administrative Reviews

AGENDA

- Frequency of Reviews
 - How often
 - What account types
- Basic Review Questions
- Source of Data
 - Internet (online)
 - External (hard copy files)
- Reg 9 Review in Relation to the Administrative Review
- Administrative Review Process
 - Automated Process
 - Manual Process
 - Transition Period
- Approval Process

ATTACHMENTS – SAMPLE DOCUMENTS

- Manual Administrative Account Review Preparation
 - Account Administrative Review Format
 - Account Summary Format
 - Sample of Drop-down Boxes for Review and Summary Answers
- Automated Administrative Account Review Preparation
 - Automated Account Review screens
 - Review Questionnaire - Completed Administrative Review



Account Administrative Review

Review Month: _____

Account Name: _____	
Account Number: _____	Account Type: _____
Market Value: _____	Annual Account Fee: _____

Account Administrator

Signature

Date

Head of Trust Administration Signature

Date

Account Review Committee

Committee Comments: _____

Actions Item(s): _____

Due Date: _____

Response(s): _____

Completion Date: _____

By: _____

Authorized Committee Member Signature

Date

Account Administrative Review

Account Number:

Administration Review	
1	Has the attached Account Summary been reviewed / updated?
2	Is the coding correct on the attached Account Synoptic Report and are the transactions in conformance with the governing instrument?
3	Is signed, suitable, governing instrument in file that has been imaged and indexed into Nautilus?
4	If any assets are pledged, is account coding and documentation regarding the pledge current and consistent?
5	Does account hold any loans, leases or advancements to beneficiaries?
6	If any discretionary distributions have been made in the last 12 months, have approvals been obtained from co-trustee(s) and/or Trust Discretionary Committee?
7	Are you aware of any pending or potential litigation against MB?
8	Does the account have any policy exceptions or OCC / Audit issues?
9	Is the annual account fee less than 80% of the standard applicable fee schedule?
10	Comments:

Investment Review (not applicable for Custody accounts)	
1	What is the account's investment objective?
2	Does the current asset allocation match the investment objective?
3	If the account holds assets on the Investment Review List or on the Non Coverage List, has written client direction been obtained within the last 36 months?
4	Does the account have a market value greater than \$250,000 and hold any stock or corporate bond concentrations greater than 10%?
5	Does the account have a market value greater than \$250,000 and cash equivalents exceeding 20% of the account value?
6	If the account holds MB Financial stock, has written client direction been obtained within the last twelve (12) months?
7	Does account hold any non-standard assets, other than Real Estate?
8	If there are any outside brokerage held assets, has management approved?
9	If there is an outside investment manager involved with this account, has management approved?
10	If the account holds Real Estate, has the annual Real Estate Review been completed?
11	If the account holds Insurance Policies and/or Annuities, have the policies been reviewed within the last three years and has the insurer/issuer been reviewed within the last year?
12	Comments:

ACCOUNT SUMMARY PREPARED BY ADMINISTRATOR

(Printed and included with manual review package or electronically attached to automated review)



Account Summary

Updated:

Account Name:	
Account Number:	Account Type:
Market Value:	Bank Capacity:
Date of Appointment:	Tax ID #:
Related Trust Accounts:	

Relationship Manager:
Administrative Officer:
Portfolio Manager:

Name of
Address:
SSN:
Date of Birth:
Home Phone #:
Cell. Phone #:
Email Address:

Date of Death:
Work Phone #:
Fax #:

Name of
Address:
SSN:
Date of Birth:
Home Phone #:
Cell. Phone #:
Email Address:

Date of Death:
Work Phone #:
Fax #:

Current Beneficiaries Relationship SSN D.O.B. Phone #

Remaindermen Relationship SSN D.O.B. Phone #

Co-fiduciary:
Address:
Phone Number:
Fax Number:
Email Address:

Attorney:
Address:
Phone Number:
Fax Number:
Email Address:

Accountant:
Address:
Phone Number:
Fax Number:
Email Address:

Guardian of Person:

IRA Required Beginning Date:

Statement Recipients

Fee Allocation:
Invoice Fees to:

Investment Authority:
Investment Objective:
Time Horizon:
Liquidity Needs:
Marginal Tax Bracket:

Investment Comments:

Tax Interface:
Type of Trust:
1040 Preparation:
1041 Preparation:
Duplicate Copies to:
Tax Prep Fees:

Current Remittances:

Income Provisions:

Principal Provisions:

Rights of Withdrawal:

Termination:

Real Estate:
Property Address:

Real Estate:
Property Address:

Real Estate:
Property Address:

Real Estate:
Property Address:

Comments / Concerns /
Unique Provisions:

Statement Frequency:

Consolidated Fees: Yes No

Pledged Assets: Yes No

Step-up in Cost Basis:
 All Assets
 No Assets
 Specific Assets (see comments)

INPUT VIA ACCOUNT SUMMARY WORD PROCESSING DOCUMENT

TEMPLATE ACCT SUMMARY 05-05 REVISION.doc - Microsoft Word

File Edit View Insert Format Tools Table Window Help

Send Secure 100% Read

Normal Times New Roman 10 B I U

Insert Word Field

ACCOUNT SUMMARY PREPARED BY ADMINISTRATOR
(Printed and included with manual review package or electronically attached to automated review)

mb financial bank

Account Summary

Updated: []

Account Name:	[]	Account Type:	[]
Account Number:	[]	Corp. Trust	
Market Value:	[]	Custody	
Date of Appointment:	[]	Employee Benefit - Agent	
Related Trust Accounts:	[]	Employee Benefit - Trustee	
		Escrow	
Relationship Manager:	[]	Estate	
Administrative Officer:	[]	Guardianship	
Portfolio Manager:	[]	Investment Management	
Name of []	[]	IRA - Managed	
Address:	[]	IRA - Custody	
SSN:	[]	Irrevocable Trust	
Date of Birth:	[]	Revocable Trust	
Home Phone #:	[]	Other	
Cell Phone #:	[]	Testamentary Trust	
Email Address:	[]		
Name of []	[]		
Address:	[]		

Draw AutoShapes

Page 1 Sec 1 1/2 At 2.3" Ln 8 Col 1 REC TRK EXT OVR

Start EXCEPTIONS ... Welcome to T... TEMPLATE A... 16 Reminders T:\Account_S... INPUT VIA AC... Inbox - Micros... 10:22 AM

When applicable, questions answered via drop down menu that corresponds with terminology used on trust system.

INPUT VIA ACCOUNT ADMINISTRATIVE REVIEW WORD PROCESSING DOCUMENT

TEMPLATE ACCOUNT REVIEW FORM 4-08.doc - Microsoft Word

File Edit View Insert Format Tools Table Window Help

Send Secure

Normal Times New Roman 10

Account Administrative Review

Account Number: [REDACTED]

Administration Review	
1	Has the attached Account Summary been reviewed / updated?
2	Is the coding correct on the attached Account Synoptic Report and are the transactions in conformance with the governing instrument?
3	Is signed, suitable, governing instrument in file that has been imaged and indexed into Nautilus?
4	If any assets are pledged, is account coding and documentation regarding the pledge current and consistent?
5	Does account hold any loans, leases or advances?
6	If any discretionary distributions have been made in 6 months, have approvals been obtained from co-trust Discretionary Committee?
7	Are you aware of any pending or potential litigation against ME?
8	Does the account have any policy exceptions or OCC / Audit issues?
9	Is the annual account fee less than 80% of the standard applicable fee schedule?
10	Comments:

Investment Review (not applicable for Custody accounts)

Page 2 Sec 1 2/2 At 2.6" Ln 11 Col 1 REC TRK EXT OVR

Start EXCEPTIONS : Da... Welcome to Trust... 16 Reminders H:\ACCOUNT REV... INPUT VIA ACCO... TEMPLATE ACCO... 11:02 AM

Each question answered via drop down menu that determines and points to which type of review (Tier 1 = Manager; Tier 2 = Committee) is requisite for account.

AAR ADMINISTRATOR INPUT SCREENS

Automated Account Review - 2.0 [Build Version : 2.0.4.4 Build Date : 12/29/2009] - Microsoft Internet Explorer

mb financial
bank

MB Financial [TrustRite] - Monday, March 22, 2010

Automated Account Review | My Profile

Investment Review Console Change Review Type/Role : Regulatory Review/Review Committee | Last Search Result

Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:

Account Overview Review Information Review Questionnaire Portfolio Holdings Reports Previous Reviews

Sl No.	Questions For : Review Committee	Answer
1	Has account been successfully reviewed?	No
	Comment: <input type="text"/>	Use For Future Review <input type="checkbox"/>
	Attach Document <input type="text"/> Browse...	
Sl No.	Questions For : Investment Officer	Answer
1	Has the Investment Policy Statement been updated in the last 12 months?	No
	Comment: <input type="text"/>	Use For Future Review <input type="checkbox"/>
	Attach Document <input type="text"/> Browse...	
2	Does the portfolio provide sufficient income and liquidity?	No
	Comment: <input type="text"/>	Use For Future Review <input type="checkbox"/>
	Attach Document <input type="text"/> Browse...	
3	Is the portfolio invested in accordance with the account's tax status?	No

Save Reset

Start 17 Reminders Welcome to Trust... EXCEPTIONS : D... RE RELEASE FORM Automated Acc... Document1 - Micr... 1:07 PM



Investment Review Console Change Review Type/Role : Regulatory Review/Review Committee | Last Search Result

Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:

Account Overview Review Information Review Questionnaire Portfolio Holdings Reports Previous Reviews

Attach Document [Browse...]

3 Is the portfolio invested in accordance with the account's tax status? [No] Use For Future Review []

Comment: []

Attach Document [Browse...]

SI No. Questions For : Account Administrator Answer

1 Has the attached Account Summary been reviewed/updated? [No] Use For Future Review []

Comment: []

Attach Document [Browse...]

2 Is the coding correct on the attached Account Synoptic Report and are the transactions in conformance with the governing instrument? [No] Use For Future Review []

Comment: []

Attach Document [Browse...]

Save Reset



Investment Review Console

Change Review Type/Role : Regulatory Review/Review Committee | Last Search Result

Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:



Account Overview	Review Information	Review Questionnaire	Portfolio Holdings	Reports	Previous Reviews
3	Is signed, suitable, governing instrument on file and has it been imaged and indexed into Nautilus?			<input type="text" value="No"/>	<input type="button" value="Use For Future Review"/>
<input type="text" value="Comment:"/>	<input type="text"/>				
<input type="button" value="Attach Document"/>	<input type="text" value="Browse..."/>				
4	Are you aware of any pending or potential litigation against MB?			<input type="text" value="No"/>	<input type="button" value="Use For Future Review"/>
<input type="text" value="Comment:"/>	<input type="text"/>				
<input type="button" value="Attach Document"/>	<input type="text" value="Browse..."/>				
5	Does the account have any policy exceptions or OCC / Audit issues?			<input type="text" value="No"/>	<input type="button" value="Use For Future Review"/>
<input type="text" value="Comment:"/>	<input type="text"/>				
<input type="button" value="Attach Document"/>	<input type="text" value="Browse..."/>				
6	Is the annual account fee less than 80% of the standard applicable fee schedule?			<input type="text" value="No"/>	<input type="button" value="Use For Future Review"/>
<input type="text" value="Comment:"/>	<input type="text"/>				
<input type="button" value="Attach Document"/>	<input type="text" value="Browse..."/>				
				<input type="button" value="Save"/>	<input type="button" value="Reset"/>



Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:



Account Overview	Review Information	Review Questionnaire	Portfolio Holdings	Reports	Previous Reviews
6	Is the annual account fee less than 80% of the standard applicable fee schedule?			No	
Comment:	<input type="text"/>			Use For Future Review <input type="checkbox"/>	
Attach Document	<input type="text"/> Browse...				
7	If the account owner/participant has attained age 70 1/2 has an annual RMD notification been provided?			No	
Comment:	<input type="text"/>			Use For Future Review <input type="checkbox"/>	
Attach Document	<input type="text"/> Browse...				
8	If any assets are pledged, is the account coding and documentation regarding the pledge current and consistent?			No	
Comment:	<input type="text"/>			Use For Future Review <input type="checkbox"/>	
Attach Document	<input type="text"/> Browse...				
9	Does the account hold any loans, leases or advancements to beneficiaries?			No	
				Use For Future Review <input type="checkbox"/>	
				Save	Reset

3 of 24 - Clipboard Item collected.



Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account

Account Overview	Review Information	Review Questionnaire	Portfolio Holdings	Reports	Previous Reviews
9	Does the account hold any loans, leases or advancements to beneficiaries?	<input type="text"/>			No Use For Future Review <input type="checkbox"/>
	Comment:	<input type="text"/>			
	Attach Document	<input type="text"/> Browse...			
10	If any discretionary distributions have been made in the last 12 months, have approvals been obtained from co-trustee(s) and/or Trust Discretionary Committee?	<input type="text"/>			No Use For Future Review <input type="checkbox"/>
	Comment:	<input type="text"/>			
	Attach Document	<input type="text"/> Browse...			
11	Does the current asset allocation match the investment objective?	<input type="text"/>			No Use For Future Review <input type="checkbox"/>
	Comment:	<input type="text"/>			
	Attach Document	<input type="text"/> Browse...			
12	If the account holds assets on the Investment Review List or on the Non-coverage List, has written client direction been obtained within the last 36 months?	<input type="text"/>			No
					Save Reset



Investment Review Console Change Review Type/Role : Regulatory Review/Review Committee | Last Search Result

Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:

Account Overview	Review Information	Review Questionnaire	Portfolio Holdings	Reports	Previous Reviews
Attach Document					
12	If the account holds assets on the Investment Review List or on the Non-coverage List, has written client direction been obtained within the last 36 months?			No	Use For Future Review <input type="checkbox"/>
Comment:	<input type="text"/>				
Attach Document					
13	Does the account have a market value greater than \$250,000 and cash equivalents exceeding 20% of the account value?			No	Use For Future Review <input type="checkbox"/>
Comment:	<input type="text"/>				
Attach Document					
14	If the account holds MB Financial stock, has written client direction been obtained within the last twelve (12) months?			No	Use For Future Review <input type="checkbox"/>
Comment:	<input type="text"/>				
Attach Document					
15	Does the account hold any non-standard assets, other than Real Estate?			No	
				Save	Reset



Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:



Account Overview	Review Information	Review Questionnaire	Portfolio Holdings	Reports	Previous Reviews
Attach Document	<input type="text"/>	<input type="button" value="Browse..."/>			
15	Does the account hold any non-standard assets, other than Real Estate?			<input type="text" value="No"/>	<input type="checkbox"/> Use For Future Review
Comment:	<input type="text"/>	<input type="button" value="Browse..."/>			
Attach Document	<input type="text"/>	<input type="button" value="Browse..."/>			
16	If there are any outside brokerage held assets, has management approved?			<input type="text" value="No"/>	<input type="checkbox"/> Use For Future Review
Comment:	<input type="text"/>	<input type="button" value="Browse..."/>			
Attach Document	<input type="text"/>	<input type="button" value="Browse..."/>			
17	If the account holds real estate, has the annual real estate review been completed?			<input type="text" value="No"/>	<input type="checkbox"/> Use For Future Review
Comment:	<input type="text"/>	<input type="button" value="Browse..."/>			
Attach Document	<input type="text"/>	<input type="button" value="Browse..."/>			
	If the account holds insurance policies and/or annuities, have the policies been				
				<input type="button" value="Save"/>	<input type="button" value="Reset"/>



Investment Review Console

Change Review Type/Role : Regulatory Review / Review Committee | Last Search Result

Type: Regulatory Review Review ID: 219 Status: Open Date: 03/01/2010 Account:



Account Overview Review Information Review Questionnaire Portfolio Holdings Reports Previous Reviews

Attach Document	<input type="text"/>	Browse...
16	If there are any outside brokerage held assets, has management approved?	No
Comment:	<input type="text"/>	Use For Future Review <input type="checkbox"/>
Attach Document	<input type="text"/>	Browse...
17	If the account holds real estate, has the annual real estate review been completed?	No
Comment:	<input type="text"/>	Use For Future Review <input type="checkbox"/>
Attach Document	<input type="text"/>	Browse...
18	If the account holds insurance policies and/or annuities, have the policies been reviewed within the last three years and has the insurer/issuer been reviewed within the last year?	No
Comment:	<input type="text"/>	Use For Future Review <input type="checkbox"/>
Attach Document	<input type="text"/>	Browse...

Review Questionnaire

Date Of Run : 03/23/2010

Time Printed : 10:30:22 AM

Account Number : _____ Account Administrator : _____
 Account Name : _____ Investment Officer : _____
 Review date : 3/1/2010

Account Administrator

SL.No	Questions	Answers (Y/N/NA)	Answer Comments
1	Has the attached Account Summary been reviewed/updated?	Yes	
2	Is the coding correct on the attached Account Synoptic Report and are the transactions in conformance with the governing instrument?	Yes	
3	Is signed, suitable, governing instrument on file and has it been imaged and indexed into Nautilus?	Yes	
4	Are you aware of any pending or potential litigation against MB?	No	
5	Does the account have any policy exceptions or OCC / Audit issues?	No	
6	Is the annual account fee less than 80% of the standard applicable fee schedule?	No	
7	If the account owner/participant has attained age 70 1/2 has an annual RMD notification been provided?	Not Applicable	
8	If any assets are pledged, is the account coding and documentation regarding the pledge current and consistent?	Not Applicable	
9	Does the account hold any loans, leases or advancements to beneficiaries?	No	
10	If any discretionary distributions have been made in the last 12 months, have approvals been obtained from co-trustee(s) and/or Trust Discretionary Committee?	Not Applicable	
12	Does the current asset allocation match the investment objective?	No	Account being rebalanced at this time.
13	If the account holds assets on the Investment Review List or on the Non-coverage List, has written client direction been obtained within the last 36 months?	Not Applicable	
14	Does the account have a market value greater than \$250,000 and cash equivalents exceeding 20% of the account value?	No	
15	If the account holds MB Financial stock, has written client direction been obtained within the last twelve (12) months?	Not Applicable	
16	Does the account hold any non-standard assets, other than Real Estate?	No	
17	If there are any outside brokerage held assets, has management approved?	Not Applicable	
18	If the account holds real estate, has the annual real estate review been completed?	Not Applicable	
19	If the account holds insurance policies and/or annuities, have the policies been reviewed within the last three years and has the insurer/issuer been reviewed within the last year?	Not Applicable	

Investment Officer

SL.No	Questions	Answers (Y/N/NA)	Answer Comments
1	Has the Investment Policy Statement been updated in the last 12 months?	Yes	
3	Does the portfolio provide sufficient income and liquidity?	Yes	
6	Is the portfolio invested in accordance with the account's tax status?	Yes	

Review Questionnaire

Date Of Run : 03/23/2010

Time Printed : 10:30:22 AM

Account Number : _____ Account Administrator : _____
Account Name : _____ Investment Officer : _____
Review date : 3/1/2010

Review Committee

SL.No	Questions	Answers (Y/N/NA)	Answer Comments
1	Has account been successfully reviewed?		

Review Questionnaire

Date Of Run :

Time Printed :

Account Number : Account Administrator :

Account Name : Investment Officer :

Review date :

Account Administrator

SL.No	Questions	Answers (Y/N/NA)	Answer Comments
1	Has the attached Account Summary been reviewed/updated?	Yes	
2	Is the coding correct on the attached Account Synoptic Report and are the transactions in conformance with the governing instrument?	Yes	
3	Is signed, suitable, governing instrument on file and has it been imaged and indexed into Nautilus?	Yes	
4	Are you aware of any pending or potential litigation against MB?	No	
5	Does the account have any policy exceptions or OCC / Audit issues?	No	
6	Is the annual account fee less than 80% of the standard applicable fee schedule?	No	
7	If the account owner/participant has attained age 70 1/2 has an annual RMD notification been provided?	Not Applicable	
8	If any assets are pledged, is the account coding and documentation regarding the pledge current and consistent?	Not Applicable	
9	Does the account hold any loans, leases or advancements to beneficiaries?	No	
10	If any discretionary distributions have been made in the last 12 months, have approvals been obtained from co-trustee(s) and/or Trust Discretionary Committee?	Not Applicable	
12	Does the current asset allocation match the investment objective?	No	Account being rebalanced at this time.
13	If the account holds assets on the Investment Review List or on the Non-coverage List, has written client direction been obtained within the last 36 months?	Not Applicable	
14	Does the account have a market value greater than \$250,000 and cash equivalents exceeding 20% of the account value?	No	
15	If the account holds MB Financial stock, has written client direction been obtained within the last twelve (12) months?	Not Applicable	
16	Does the account hold any non-standard assets, other than Real Estate?	No	
17	If there are any outside brokerage held assets, has management approved?	Not Applicable	
18	If the account holds real estate, has the annual real estate review been completed?	Not Applicable	
19	If the account holds insurance policies and/or annuities, have the policies been reviewed within the last three years and has the insurer/issuer been reviewed within the last year?	Not Applicable	

Investment Officer

SL.No	Questions	Answers (Y/N/NA)	Answer Comments
1	Has the Investment Policy Statement been updated in the last 12 months?	Yes	
	Does the portfolio provide sufficient income and liquidity?	Yes	
	Is the portfolio invested in accordance with the account's tax status?	Yes	

Review Questionnaire

Date Of Run : C

Time Printed :

Account Number :

Account Administrator :

Account Name :

Investment Officer :

Review date :

Review Committee

SL.No	Questions	Answers (Y/N/NA)	Answer Comments
1	Has account been successfully reviewed?		