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Posted by the **Comptroller of the Currency** on Dec 29, 2025

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What would a small community bank with three or less offices face if they document that they are unable to bank a certain business because the due diligence required for that particular customer is more than the bank can handle? The bank is not refusing them due to the fact they might be a large MSB for example, but because the management and due diligence requirements are more than the institution can handle due to its size.

It's important to remember that smaller institutions may have to turn away a business on a case-by-case basis due to the financial institutions' ability and resources to manage and service the account along with the proper due diligence that is expected. There are times a business is too large and involved for a small community bank to manage.

Comment ID

OCC-2025-0142-0023



Tracking Number

mjk-51w3-akx3

Comment Details

Submitter Info

Document Subtype

Public Comment

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Received Date

Dec 24, 2025



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