



April 6, 2006

Information Collection Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552

**Re: Request for Comments – Suspicious Activity Report for Depository Institutions**

Gentlemen:

Roma Bank, an OTS-regulated thrift institution based in Robbinsville, New Jersey, has observed the request for comment on the captioned matter, which was published in the *Federal Register* on February 17, 2006 (Vol. 71, No. 33).

We have reviewed the proposed revisions to the Suspicious Activity Report (SAR), which is planned to become effective on January 1, 2007. We are in general agreement with the majority of the changes summarized in the "Supplementary Information" section; however, we would like to offer the following comments:

1. We would prefer to see Part II changed to provide separate line items, with supporting boxes, for "deposit structuring" and "money laundering". The two activities are separate and distinct, and we are of the opinion that it is incorrect to lump the two together on one line.
2. We would prefer to see Item 1 expanded to provide space for disclosure if the SAR represents a repeat reporting on the individual identified on Item 3. The insertion of this information will alert the Internal Revenue Service that the SAR is not the first filing on the individual. The following language might be appropriate for this purpose:

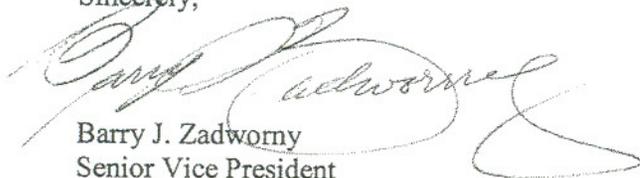
"Check this box if previous SARs have been filed, within the last twelve months, on the subject identified in Item 3 \_\_\_\_\_"

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3. We have observed that Item 33 includes the Internal Revenue Service (IRS), the Securities Exchange Commission (SEC), and the Commodity Futures Trading Commission (CFTC). Inasmuch as the foregoing agencies are not "Depository Institutions", as that term is used and defined in the SAR instructions, we must question the need for their presence on the proposed SAR.
4. There appears to be a typographical error in Part IV, Item 56 (i.e., the word "office" should be "officer").
5. With respect to Part IV, we would like to suggest that space be provided for the signature of the contact officer, along with the contact officer's e-mail address, if any. We believe the latter item will aid the Internal Revenue Service in the event supplementary clarification/information is needed on the SAR.

We appreciate the opportunity to comment on the proposed SAR. We trust that the comments enumerated in this letter will be of utility to the Federal regulatory agencies as they continue working toward the development of an SAR that will be useful to law enforcement authorities.

Sincerely,



Barry J. Zadworny  
Senior Vice President

cc: Ms. Krista Shonk, Regulatory Counsel  
America's Community Banker

Mr. James Meredith, Senior Vice President  
New Jersey League of Community Bankers