

TCBON FUNDS AVAILABILITY REVIEW MEMORANDUM Regulation CC + Ohio Law Alignment

Sealed Version v1.1

Prepared For: Internal Review / Bank Escalation
Prepared By: The Country Bank of Needham (TCBON)
Date: _____
Subject Account: _____
Deposit Date: _____
Amount: _____

I. Executive Summary

This memorandum evaluates whether the subject deposit hold complies with the Expedited Funds Availability Act (EFAA), Regulation CC (12 C.F.R. Part 229), applicable Ohio statutory framework, and TCBON internal availability controls. Preliminary Position: Funds should be available on the next business day unless a properly noticed and legally supported exception hold applies.

II. Exception Hold Validation

Delays beyond next-day availability are permissible only if properly invoked and noticed. The institution must document the exception category and provide a compliant hold notice.

III. Determination

- Hold appears compliant
- Hold requires clarification
- Hold appears non-compliant

Basis: _____

QR Verification: https://verify.thecountrybankofneedham.com/record_id

SHA-256 Manifest: 44702489844f66ef565955816af5bd4e9835bb92372d2f12890c46c250112c61

Dual-Control Countersignature Panel

Authorized By (Treasury): _____	Authorized By (Compliance): _____
Date:	Date:

<hr/>	<hr/>
-------	-------