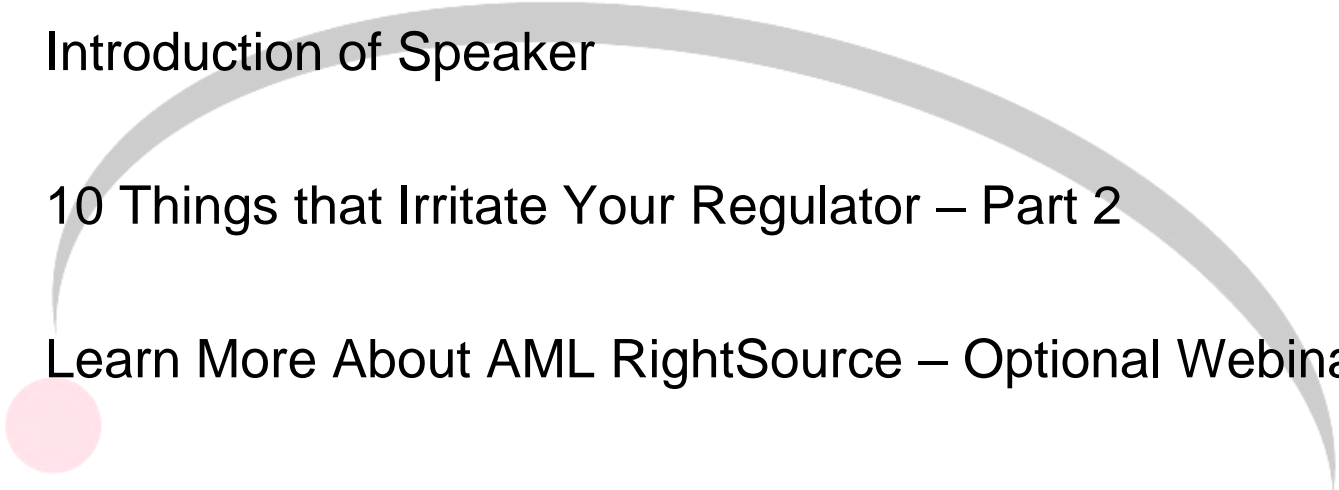




**Ten MORE Things That Irritate Your Regulator  
Relative to BSA/AML Compliance  
Part 2**

*Thank you for joining us  
The presentation will begin shortly*

# 10 MORE Things that Irritate Your Regulator – Part 2

1. Introduction to AML RightSource
  2. Introduction of Speaker
  3. 10 Things that Irritate Your Regulator – Part 2
  4. Learn More About AML RightSource – Optional Webinar
  5. Question & Answers
- 

# About AML RightSource

- Founded in 2005 by former Deloitte professionals.
- Helped design and implement the first post 9/11 BSA/AML compliance department .
- AMLRS team is comprised of compliance officers and analysts with experience working within the financial institution industry.
- Designed the first and only managed services solution that combines the people, the process, the technology and the knowledge that financial institutions need for a robust BSA/AML Transaction Monitoring program.
- AMLRS services have withstood regulatory audit and review, providing a superior BSA/AML Transaction Monitoring solution.

# Speaker Today: Sal Fragapane, CAMS

- 19 years in the banking industry with a focus on internal audit and compliance
- Areas of Expertise: BSA / AML & Consumer compliance regulations specific to banks
- BSA/Compliance officer with a \$10 Billion dollar Savings and Loan
- Currently Chief Compliance Officer for AML RightSource
- MBA – Baldwin Wallace College, BSBA – Finance – Bowling Green State University , CAMS certified

# 10 MORE Things that Irritate Your Regulator – Part 2

The content of this webinar is derived from many years of experience our staff and I have working at and with financial institutions.

In addition, AML RightSource has had several conversations with Regulators over the years about this very topic and our day to day interactions with our bank clients and helping them prepare for, manage, and pass their BSA exams has afforded us plenty of insight.

# 10 MORE Things that Irritate Your Regulator – Part 2

1. Having a practice that is not in writing

What you do and how you do it should be noted in your policies and procedures

From the perspective of your regulator: “a practice that is not in writing does not exist”

# 10 MORE Things that Irritate Your Regulator – Part 2

2. Transaction monitoring that only looks for one specific activity

If all you are looking for is structuring, that is all that you will see



# 10 MORE Things that Irritate Your Regulator – Part 2

3. OFAC SDN list monitoring specifications too narrow

Ignoring AKA's

100 % match settings



# 10 MORE Things that Irritate Your Regulator – Part 2

4. Overused comments:

“We know our customers...”

“They have been banking with us for years...”

# 10 MORE Things that Irritate Your Regulator – Part 2

5. Only monitoring wire transfer activity for OFAC SDN compliance

Not monitoring wire transfers for suspicious activity



# 10 MORE Things that Irritate Your Regulator – Part 2

6. Good CDD for new customers – weak / no CDD for old customers

Although CIP grandfathers customers pre fall 2003, it does not provide the bank with an excuse to not monitor these customers

It also does not provide the bank the option to not identify high risk customers or have undetermined risk

# 10 MORE Things that Irritate Your Regulator – Part 2

7. Not documenting quality control reviews and methodology

A manager waiving cases via an undocumented sampling method

Not maintaining good notes relative to adjudicating cases

# 10 MORE Things that Irritate Your Regulator – Part 2

8. Delay or avoidance tactics...

“We are working on that...”



# 10 MORE Things that Irritate Your Regulator – Part 2

9. Not being able to explain your approach and processes in satisfying the BSA at your institution.

Doing so builds comfort and confidence with your regulator

Not doing so lowers their confidence and raises more questions

# 10 MORE Things that Irritate Your Regulator – Part 2

10. A BSA program that does not keep up with a growing institution

Controls and monitoring efforts not keeping up

Introducing new products and transactions (RDC) but no monitoring efforts accompany them

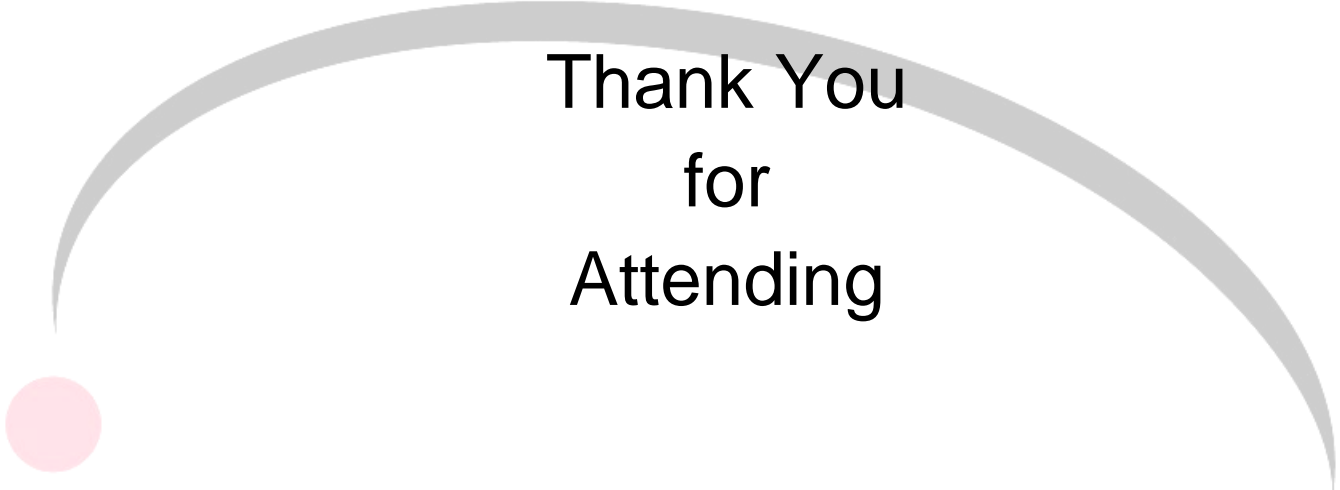
Make compliance part of the process

# Questions and Answers



Please submit your questions now...

# The End



Thank You  
for  
Attending

[www.AMLRightSource.com](http://www.AMLRightSource.com)