



Current AML Issues

ADVISORY

Agenda

- **Programmatic Changes**

- Creating Efficiencies on a Global Basis
- Integration of AML, FCPA, Identity Theft & Fraud Programs

- **Changing Risks**

- Unlawful Internet Gambling Enforcement Act
- Stimulus Funds
- Mortgage Loan Fraud

Programmatic Changes

- **Creating Efficiencies in Your Global Program**
 - Oversight committees
 - Global FIUs
 - Leveraging AML monitoring
 - Streamlining the AML Program
 - Training
- **Integration of AML, FCPA, Identity Theft & Fraud Programs**
- **Revisiting the Risk Based Approach**

Changing Risks

- **Unlawful Internet Gambling Enforcement Act**

- December 10, 2009 Implementation Date
- Prohibits any person engaged in the business of betting or wagering from knowingly accepting payments in connection with the participation of another person in unlawful Internet gambling.
- Rules apply to “Designated Payment Systems” Located in the US
- Require to prevent “restricted transactions”
- Apply only to Commercial Customers, not individual accountholders

- **Stimulus Funds**

- Need to consider risks of various government stimulus programs as part of overall risk assessment and perhaps at customer level as well
- Do any of these risks require a change in your program’s focus?

- **Mortgage Loan Fraud**

Thank You for Joining Us!

- ***If you have any questions regarding this presentation, please contact:***
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