Current AML Issues
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:

  Darren J. Donovan, Principal
  Forensic National Leader for Banking & Finance
  KPMG Forensic℠
  djdonovan@kpmg.com

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