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SUMMARY: Attorney, Certified Anti-Money Laundering Specialist (CAMS), and former US banking regulator (FDIC) with substantial expertise in Bank Secrecy Act/Anti-Money Laundering (BSA/AML) compliance for over 17 years. Expert witness on BSA/AML compliance in a number of civil cases, most involving fraud, including civil forfeiture case on behalf of U.S. Attorney's Office (SDNY). Participated in two major monitorships involving multinational financial institutions (BNP Paribas and AIG).

LAW OFFICE OF ROSS S. DELSTON, WASHINGTON, DC **2006 – PRESENT**

- Testifying or consulting expert on BSA/AML compliance issues and/or red flags for money laundering in civil cases in Federal and state courts, including *U.S. v. Prevezon*, a civil forfeiture case, on behalf of the U.S. Attorney's Office (SDNY).
- Participated in major BSA/AML compliance project as part of Independent Consultant's team for BNP Paribas for five-month period ending early 2015. Project involved trade finance, international banking, AML/KYC, and sanctions/OFAC.
- Assisted Bryan Cave law firm in 15-month project as part of AIG monitorship: Reviewed AIG's BSA/AML compliance functions worldwide; analyzed compliance policies; interviewed compliance officers; and drafted recommendations.
- Conducted five consecutive annual reviews for a publicly-held MSB and recently completed a review for a small MSB with nine offices in Washington, DC area.
- Retained by financial regulator of major offshore financial center (OFC) to conduct a review of its AML/CFT compliance activities as well as those of the regulated sector.
- Consultant to IMF since 1997, including participation in nine AML/CFT assessments of offshore financial centers (OFCs) including Saint Vincent, Bermuda and Jersey, and drafting legislation on AML/CFT and banking regulation for numerous countries.
- Consultant to World Bank since 1998 on banking issues in Asia and Eastern Europe.

MANAGING DIRECTOR, KALORAMA PARTNERS, WASHINGTON, DC **2005 – 2006**

- Advised financial services firms on compliance issues as a member of strategic consulting firm headed by former SEC Chairman Harvey Pitt.
- Consultant to Kalorama on review of compliance program for broker-dealer to ensure consistency with NYSE and NASD requirements, October 2005.

LEGAL DEPARTMENT, INTERNATIONAL MONETARY FUND, WASHINGTON, DC

Consulting Counsel (full-time) specializing in AML/CFT **2000 – 2005**

Legal Consultant (project basis) on banking laws **1997 – 2000**

- **OFC Coordinator:** Designated by General Counsel to coordinate legal team during initial phase of OFC assessment program, July – January 2000.
- **AML/CFT assessments:** Participated in assessments of seven OFCs.
- **Legislative drafting:** Drafted laws on AML/CFT and banking for numerous countries.
- **Training:** Organized, moderated and/or spoke at numerous legislative drafting workshops for government officials on implementing AML/CFT standards.

LAW OFFICE OF ROSS S. DELSTON, WASHINGTON, DC 1994 – 2000

- Specialized in bank regulatory and transactional matters for clients such as a Fortune 50 industrial corporation, a major commercial bank, and an S&L holding company.
- Reviewed US government agency proposal for compliance and OFAC program.
- Consultant to World Bank on banking issues; missions to Philippines and Turkey.

OF COUNSEL, JONES DAY, WASHINGTON, DC 1991 – 1994

- Specialized in bank mergers and acquisitions and regulatory matters.
- Represented a money-center bank in successful bid on an insolvent bank controlled by the FDIC, and a consumer finance firm in licensing an industrial loan company.
- Testified on open bank assistance before RTC Oversight Board.

COUNSEL AND ASSISTANT GENERAL COUNSEL – ASSISTED ACQUISITIONS, LEGAL DEPARTMENT, FEDERAL DEPOSIT INSURANCE CORP., WASHINGTON, DC 1986 – 1991

- Created, organized and headed 20-attorney Assisted Acquisitions unit, advised FDIC Chairman and Board, led teams responsible for drafting and negotiating deal documents, hired and supervised outside counsel, and implemented training.
- Responsible for the legal work on resolutions of major insolvent banks during US banking crisis, including open bank assistance and bridge bank transactions for virtually every major bank failure during that period.

COUNSEL, EXPORT-IMPORT BANK OF THE US, WASHINGTON, DC 1976 – 1986

- Drafted and negotiated numerous loan, guarantee, and insurance transactions.
- Lead attorney on a \$1.5 billion emergency trade credit facility for Brazil, at that time the largest commitment ever authorized by the Export-Import Bank.
- Traveled to Nigeria, Ivory Coast, Senegal, Ecuador, and Bolivia to assess projects.

CERTIFICATIONS, MEMBERSHIPS & AFFILIATIONS

- Certified Anti-Money Laundering Specialist (CAMS), 2007 – present.
- Certified CAMS Trainer, 2010 – present.
- AV Preeminent rating by Martindale-Hubbell Law Directory (highest rating).
- Founding board member, US Capital Chapter of Association of Certified Anti-Money Laundering Specialists (ACAMS), 2009 – 2011; Advisor to Board, 2011 – 2013.
- Co-chaired American Bar Association International AML Committee, 2008 – 2011.
- International Editorial Board, Journal of Banking Regulation (London), 2004 – present.
- District of Columbia Bar Association, 1977 – present.
- Adjunct Professor of Law, Senior Fellow of Financial Integrity Institute, and Member, Professional Advisory Committee, Executive M.A. in Financial Integrity Program, Case Western Reserve University School of Law, as of January 2016. For more information, please see <http://law.case.edu/Academics/Degrees/Masters-in-Financial-Integrity>
- Senior Adviser, Allsec Technologies, Irving, TX, 2017 – present.

EDUCATION

The George Washington University Law School, J.D. with honors, 1976.

The George Washington University, B.A. with Special Honors, 1973.

PUBLICATIONS, PRESS CLIPPINGS, AND SPEAKING ENGAGEMENTS ATTACHED

**ROSS S. DELSTON, CAMS: PUBLICATIONS & PRESS CLIPPINGS
1999 – PRESENT**

PUBLICATIONS:

“Insights: Did FinCEN Just Burst Bitcoin’s Bubble?” Moneylaundering.com News, May 31, 2013 (op-ed piece on FinCEN guidance issued in March 2013). For a copy, please see: <http://www.jdsupra.com/legalnews/insights-did-fincen-just-burst-bitcoin-68059/#!>

“Strengthening Our Security: A New International Standard on Trade-Based Money Laundering is Needed Now” (co-authored with Stephen Walls), 44 *Case Western Reserve Journal of International Law* 737 (2012). The article was reprinted in the *Annual Review of International Banking Law & Practice* (2013). For a copy of the law review article, please see: <http://www.jdsupra.com/legalnews/strengthening-our-security-a-new-intern-59767/>

“St. Vincent and the Grenadines: Detailed Assessment Report on Anti-Money Laundering and Combating the Financing of Terrorism,” IMF Country Report No. 10/311 (2010), one of four co-authors as part of IMF team, available at www.imf.org/external/pubs/ft/scr/2010/cr10311.pdf

“Reaching Beyond Banks: How to Target Trade-based Money Laundering and Terrorist Financing Through Preventive Measures Outside the Financial Sector” (co-authored with Stephen Walls), 41 *Case Western Reserve Journal of International Law* 85 (2009). The article was reprinted in *Combating Money Laundering and Terrorism Finance: Past and Current Challenges*, at p. 737, N. Beekarry, ed. (Edward Elgar Publishing Ltd., 2013), the *Annual Review of International Banking Law & Practice* at 11:81 (2011) and in *Handbook of Research on Counterfeiting and Illicit Trade*, Prof. Peggy Chaudhry, ed. (Edward Elgar Publishing Ltd., 2017). Edited versions were published in *Money Laundering Bulletin* (London, July/August 2009); *NetPractice Exchange*, Vol. 3, No. 3, at p. 16 (November/December 2009); and the American Bar Association’s *International Trade Committee Newsletter*, Vol. IV, No. 1, at p. 12 (November 2009). For the original law review article, see www.martindale.com/international-trade-law/article_Ross-S-Delston_738600.htm

‘To Protect or Not to Protect, That is the Question’: Statutory Protections for Financial Supervisors – How to Promote Financial Stability by Enacting the Right Laws” (co-authored with Prof. Andrew Campbell, University of Leeds, UK), published in *Current Developments in Monetary and Financial Law*, Vol. 5 (IMF 2008), available at: www.jdsupra.com/legalnews/to-protect-or-not-to-protect-that-is-t-72308/

“The 41st FATF Recommendation: Why preventive measures targeting trade-based money laundering should reach beyond banks,” *ACAMS Today* (July/August 2008), originally published in *Money Laundering Bulletin* (London, March 2008), available at: www.jdsupra.com/legalnews/the-41st-fatf-recommendation-why-preven-24691/

“Bermuda: Detailed Assessment Report on Anti-Money Laundering and Combating the Financing of Terrorism,” IMF Country Report No. 08/105 (2008), one of four co-authors as part of IMF team, available at: www.imf.org/external/pubs/ft/scr/2008/cr08105.pdf

“Viewpoint: Regulatory Blitz for Subprime Players?” *American Banker* (November 9, 2007)(opinion piece about legal issues relating to bank closings).

“The Blueprint for US Financial Competitiveness,” (October 2008), member of AML subgroup of Blue Ribbon Commission of the Financial Services Roundtable, available at: <http://www.prnewswire.com/news-releases/the-financial-services-roundtable-unveils-the-blueprint-for-us-competitiveness-58756632.html>

“Independent AML Audit: Essential Element or Nice to Have?” (co-authored with Martin Owen, formerly UK FSA), *Money Laundering Bulletin* (London, June 2007), available at: www.jdsupra.com/legalnews/independent-aml-audit-essential-element-62693/

“Memo to top executives: anti-money laundering compliance affects you, too” (co-authored with Martin Owen), *Money Laundering Alert* (April 2007).

“Smooth sailing or uncertain waters? The proposed US anti-money laundering regulations for hedge funds” *ACAMS Today* (May/June 2007), originally published in *Money Laundering Bulletin* (London, November 2006).

“Emergency Liquidity Financing by Central Banks: Systemic Protection or Bank Bailout?” (with Prof. Andrew Campbell, University of Leeds, UK), *Current Developments in Monetary and Financial Law, Vol. 3* (IMF 2005), available at: <http://books.google.com/books?id=yeuN4N5EHIMC&pg=PA429&lpg=PA429&dq=ross+delston&source=bl&ots=QVhdoa24Dc&sig=QLf3NQgyAHGdj4fHGbnUJZMkLvc&hl=en&sa=X&ei=HcXjU7S9MoyKyASy2YFo&ved=0CBwQ6AEwADge#v=onepage&q=ross%20delston&f=false>

“Developing an AML/CFT Strategy and Structure,” *Building an Effective Anti-Money Laundering and Counter-Terrorist Financing Regime in Afghanistan* (World Bank 2004), p. 29, available at: http://siteresources.worldbank.org/EXTAML/Resources/396511-1146581427871/afghan_aml.pdf

“Lawyers as the New Guardians of Governance,” editorial, *Amicus Curiae*, Journal of the Society for Advanced Legal Studies (London, July/August 2004), available at: http://sas-space.sas.ac.uk/2959/1/Amicus54_Delston.pdf

“Jersey – Crown Dependency of the United Kingdom: Assessment of the Supervision and Regulation of the Financial Sector” (IMF 2003), one of five co-authors as part of IMF team, available at: <https://books.google.com/books?id=KFx6PFIPadsC&pg=PA52&lpg=PA52&dq=ross+delston+jersey&source=bl&ots=SNPiQzWE1e&sig=TknWJDVFzi6aXIh0CoA94B1Raf4&hl=en&sa=X&ved=0ahUKEwiY8uXWvefMAhULbxQKHdHwC9QQ6AEIPzAG#v=onepage&q=ross%20delston%20jersey&f=false>

“Guernsey – Crown Dependency of the United Kingdom: Assessment of the Supervision and Regulation of the Financial Sector” (IMF 2003), one of four co-authors as part of IMF team, available at: <https://books.google.com/books?id=UwS1RBWrmkAC&pg=PA53&lpg=PA53&dq=ross+delston&source=bl&ots=hF36cJLBRQ&sig=wRwJMoRxeRKYH2vmr6rx3-80aH8&hl=en&sa=X&ved=0ahUKEwjRosDtu-fMAhVHORoKHTXrABo4HhDoAQgMAI#v=onepage&q=ross%20delston&f=false>

“Isle of Man – Crown Dependency of the United Kingdom: Assessment of the Supervision and Regulation of the Financial Sector” (IMF 2003), one of four co-authors as part of IMF team, available at: https://books.google.com/books?id=3lbe7bPsKIIC&pg=PT50&lpg=PT50&dq=ross+delston&source=bl&ots=NKW-X5_VS1&sig=l0JpNBZdX2wdjbpKE4DZLFOdHTc&hl=en&sa=X&ved=0ahUKEwjRosDtu-fMAhVHORoKHTXrABo4HhDoAQggMAE#v=onepage&q=ross%20delston&f=false

“Five Observations About Banking Failures,” *Current Developments in Monetary and Financial Law*, Vol. 2 (IMF 2003), available at: www.jdsupra.com/legalnews/five-observations-about-banking-failures-21950/

“Aruba: Offshore Financial Center Assessment,” (IMF 2002), one of four co-authors as part of IMF team, available at: www.imf.org/external/np/ofca/2002/eng/abw/063002.pdf

“Gibraltar: Assessment of the Regulation and Supervision of Financial Services,” IMF Staff Assessments (2001), one of eight co-authors as part of IMF team, available at: www.imf.org/external/np/ofca/2001/eng/gbr/103101.pdf

“Statutory Protections for Banking Supervisors,” *World Bank Financial Sector Paper No. 4* (1999). A summary of the paper appeared in the IMF’s *Supporting Document to the Code of Good Practices on Transparency in Monetary and Financial Affairs* (2000), available at: www.imf.org/external/np/mae/mft/sup/part3.htm#box_3-3

Member, International Editorial Board, *Journal of Banking Regulation* (London), 2004 – present.

PRESS CLIPPINGS (ARTICLES AND OTHER PRESS COVERAGE, 2010 – PRESENT):

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|------------------|--|
| January 16, 2018 | The Wall Street Journal Risk & Compliance Journal, “Senate Bill Pressures U.S. Banks Over Foreign Ties”. |
| January 12, 2018 | BuzzFeedNews, “Secret Money: How Trump Made Millions Selling Condos To Unknown Buyers, at https://www.buzzfeed.com/thomasfrank/secret-money-how-trump-made-millions-selling-condos-to?utm_term=.pqyAaZqkQ#.ewzqAgJzM |
| January 10, 2018 | USA Today, “Trump sold \$35M in real estate in 2017, mostly to secretive buyers” (about the use of LLCs by purchasers of properties), at https://www.usatoday.com/story/news/2018/01/10/trumps-secretive-real-estate-sales-continue-unabated/1018530001/ |
| January 9, 2018 | The Wall Street Journal, “Banks Seek Government Help to Track Money Laundering – Industry, anticorruption groups support creating a Treasury-run database of corporations and their owners” which appeared in the Markets section. |
| January 4, 2018 | The Wall Street Journal, “Citi Fined for Failing to Fix Money-Laundering Controls – OCC says bank hasn’t fully complied with a 2012 order, issues \$70 million penalty” which appeared in the Markets section. See |

<http://www.foxbusiness.com/features/2018/01/04/citi-fined-for-failing-to-fix-money-laundering-controls.html>

- November 29, 2017 ACAMS|Moneylaundering.com News, “Convicted Gold Trader Outlines Alleged Sanctions-Busting Scheme Involving Turkish Banks” (about a criminal case against a Turkish banker).
- November 20, 2017 McClatchy News, “Gates’ movie ties being probed by Mueller, lawyer could pose conflict” at <http://www.mcclatchydc.com/news/nation-world/national/article185702333.html>
- November 17, 2017 Bloomberg, “The Questionable Math Behind Manafort’s Extravagant Home Renovations: The former Trump campaign chief made huge payments to home improvement companies when his renovation work was estimated at far less” at <https://www.bloomberg.com/news/articles/2017-11-17/the-questionable-math-behind-manafort-s-extravagant-home-renovations>
- November 9, 2017 ACFCS News, “ ‘Paradise Papers’ Leak Reveals How the Rich, Politicos, Hide Offshore Wealth, Clashes with AML Rules” at: <https://www.acfcs.org/news/373864/Paradise-Papers-leak-reveals-how-the-rich-politicos-hide-offshore-wealth-clashes-with-AML-rules.htm>
- November 7, 2017 The Wall Street Journal Risk & Compliance Journal, “‘Paradise Papers’ Puts Corporate Tax Avoidance on Center Stage” (about leak of documents from Appleby law firm in Bermuda).
- November 7, 2017 McClatchy News, “Mueller investigation likely to probe Gates’ moonlighting as movie producer” at: <http://www.mcclatchydc.com/news/nation-world/national/article183122106.html>
- October 30, 2017 Bloomberg News, “Manafort Faces a Stark Choice: Cooperate or Risk Years in Prison” at: <https://www.bloomberg.com/news/articles/2017-10-30/manafort-faces-a-stark-choice-cooperate-or-risk-years-in-prison>
- October 30, 2017 McClatchy News, “Shock & awe? Charges suggest Mueller won’t be gentle going forward” at: <http://www.mcclatchydc.com/news/nation-world/national/article181793426.html>
- September 27, 2017 Bloomberg News, “Manafort’s Offer to Russian Oligarch Was Tied to Disputed Deal” at: <https://www.bloomberg.com/news/articles/2017-09-27/manafort-s-offer-to-russian-is-said-to-be-tied-to-disputed-deal>
- September 7, 2017 American Banker, “How this bank’s anti-laundering blunders became a ‘sales tool’” (about the remediation process at Gibraltar Bank & Trust, Coral Gables, FL)
- August 22, 2017 McClatchy News, “Pressure on Manafort grows as feds track more income, possible money laundering” at: <http://www.mcclatchydc.com/news/nation-world/national/article168495437.html>

- August 14, 2017 The New Yorker, “Trump’s Business of Corruption” (about real estate transactions outside the U.S.), at: <http://www.newyorker.com/magazine/2017/08/21/trumps-business-of-corruption>.
- August 14, 2017 Compliance Week, “AML woes continue to plague firms, amid new compliance demands” at: <https://www.complianceweek.com/news/news-article/aml-woes-continue-to-plague-firms-amid-new-compliance-demands#.WAMfciiGPcs>
- August 8, 2017 The Washington Post, “Why the Trump Organization could be Trump’s undoing” (column by David Von Drehle on real estate compliance issues), at: https://www.washingtonpost.com/opinions/why-the-trump-organization-could-be-trumps-undoing/2017/08/08/82de9980-7c4c-11e7-a669-b400c5c7e1cc_story.html?utm_term=.2c1f902ac201
- July 21, 2017 ACAMS|Moneylaundering.com News, “EU ‘Passporting’ Reforms to Highlight AML Supervisory Gaps: Sources” (about the Second Payment Services Directive known as PSD2).
- July 3, 2017 ACAMS|Moneylaundering.com News, “US Broker Dealers Revamp AML Programs Ahead of Customer Due Diligence Rule.”
- June 15, 2017 ACFCS News, “New U.S. Bill Would Revamp AML Laws with ‘Wish List’ of Transparency, Enforcement Measures,” at: <https://www.acfcs.org/news/350347/New-U.S.-bill-would-revamp-AML-laws-with-wish-list-of-transparency-enforcement-measures.htm>
- June 15, 2017 FinOps Report, “Sanctions Compliance: True Match is Hard to Find,” at: <http://finops.co/regulations/rules/sanctions-compliance-finding-a-true-match-is-hard-to-do/>
- May 15, 2017 Global Trade Review, “Trade-based money laundering: not just a bank’s burden” (about remarks made at a BAFT panel on TBML), article at: <http://www.gtreview.com/news/americas/trade-based-money-laundering-not-just-banks-burden/>, with a related video at: <https://www.youtube.com/watch?v=GbtDZfV6UIo>
- March 29, 2017 NBC News Website, “Ex-Trump Aide Manafort Bought New York Homes With Cash,” article available at: <http://www.nbcnews.com/news/us-news/trump-aide-manafort-bought-new-york-homes-cash-n739796>
- March 29, 2017 Telemundo Website, “Ex jefe de campaña de Trump compró varias propiedades en efectivo en Nueva York” [Spanish language version of article above] available at: <http://www.telemundo.com/noticias/2017/03/29/ex-jefe-de-campana-de-trump-compro-varias-propiedades-en-efectivo-en-nueva-york>
- March 14, 2017 Reuters, “Andorra bank seeks probe after U.S. Treasury forces closure for ‘money laundering’ (about FinCEN use of Sec. 311 authority), article available at: <http://www.reuters.com/article/us-usa-moneylaundering-andorra-idUSKBN16L2KB>

- February 22, 2017 The Wall Street Journal Risk & Compliance Journal, Morning Risk Report, “New HSBC Probe Puts Culture in Question,” article available at: <http://blogs.wsj.com/riskandcompliance/2017/02/22/the-morning-risk-report-new-hsbc-probe-puts-culture-in-question-newsletter-draft/>
- February 26, 2017 Abstracta, “What does the Trump administration mean for outsourcing QA?” (comments taken from American Banker article immediately below), article available at: <http://www.abstracta.us/2017/02/16/trump-administration-mean-outsourcing-qa/>
- January 24, 2017 American Banker, “Your IT outsourcing is safe under Trump. Probably.” Article available at: https://www.slideshare.net/slideshow/embed_code/key/4r3kvDZPyZ9jnA
- December 20, 2016 Compliance Week, “U.S., like much of the world, still struggles with AML crackdowns” (about the FATF Mutual Evaluation Reports on the U.S. and Switzerland).
- December 15, 2016 The Wall Street Journal Risk & Compliance Journal, “Former Guinean Minister Charged with Laundering Bribes Into U.S.” (about a money laundering prosecution related to an FCPA case), article available at: <http://blogs.wsj.com/riskandcompliance/2016/12/15/former-guinean-minister-charged-with-laundering-bribes-into-u-s/>
- December 8, 2016 Financial Crime 360, “FATF Chastises U.S. on Beneficial Ownership, Oversight of Attorneys, Real Estate, Swiss on Sharing,” article available at: <http://www.acfcs.org/news/321285/FATF-chastises-U.S.-on-beneficial-ownership-oversight-of-attorneys-real-estate-Swiss-on-sharing.htm>
- December 6, 2016 The Wall Street Journal Risk & Compliance Journal, “Taiwan, South Korea Work on Anti-Money Laundering Rules.”
- December 1, 2016 American Banker, “Here’s What’s Wrong with U.S. Anti-Laundering System: FATF” (about the FATF Mutual Evaluation Report on the U.S.); article available at: https://www.slideshare.net/slideshow/embed_code/key/eDuISUnVk0V7SU
- December 1, 2016 Reuters, “U.S. failing to curb money laundering by shell companies: task force report (about the FATF Mutual Evaluation Report on the U.S.); article available at: <http://www.reuters.com/article/us-usa-banks-moneylaundrying-idUSKBN13Q4R1?il=0>
- November 23, 2016 American Banker, “U.S. Should Take Harder Look at Nonbanks for AML Violations” (about forthcoming FATF Mutual Evaluation Report on the U.S.); article available at: https://www.slideshare.net/slideshow/embed_code/key/iV0c1dbB6KBKKq
- November 21, 2016 ACAMS|Moneylaundering.com News, “Treasury Watchdog Faults FinCEN’s Management of Enforcement Action Caseload” (about a report from the Office of Inspector General).

- September 23, 2016 American Banker, "After Canada's Poor Anti-Laundering Grade, Will U.S. Be Next?" (about FATF Mutual Evaluation Report on Canada).
- September 20, 2016 ACAMS|Moneylaundering.com News, "OCC to Pursue Cases Against Wells Fargo Executives" (about fictitious credit cards issued by the bank's employees).
- September 16, 2016 Financial Crime 360, "In Latest Evaluation, Canada Strong on Effectiveness, but Needs to Bolster Oversight on Attorneys" (about FATF Mutual Evaluation Report for Canada). Please see <https://acfcs.site-ym.com/news/308077/In-latest-evaluation-Canada-strong-on-effectiveness-but-needs-to-bolster-oversight-on-attorneys.htm>
- August 26, 2016 ACAMS|Moneylaundering.com News, "International Organization to Step Up Data Collection on Correspondent De-Risking" (about a Financial Stability Board report.)
- August 25, 2016 ACAMS|Moneylaundering.com News, "FinCEN Proposes AML Obligations for Firms Lacking Federal Supervision" (same subject as article immediately below).
- August 25, 2016 American Banker, "FinCEN to Close AML Loopholes for Firms Lacking Federal Regulator" (about proposed regulation covering certain state-chartered trust companies and credit unions).
- August 25, 2016 Financial Crime 360, "New York Regulator Levies \$180 million AML Penalty Against Taiwan Bank Linked to Panama Papers Scandal" (about DFS consent order against Mega Bank). Please see <http://www.acfcs.org/new-york-regulator-levies-180-million-aml-penalty-against-taiwan-bank-linked-to-panama-papers-scandal/>
- July 25, 2016 International Consortium of Investigative Journalists, "Secret Documents Expose Nigerian Oil Mogul's Hideaways," please see <https://panamapapers.icij.org/20160725-nigeria-oil-mogul.html>
- June 30, 2016 ACAMS|Moneylaundering.com News, "IMF Cites 'Risk-Based Approach' in Global Drop in Correspondent Services" (about June International Monetary Fund report).
- June 28, 2016 American Banker, "Six Big Items on the Next FinCEN Director's Agenda."
- June 28, 2016 FinOps Report, "AML De-Risking: Regulators Warn No Big Brooms," see <http://finops.co/investors/aml-de-risking-regulators-warn-no-big-brooms/>
- June 5, 2016 New York Times, "Panama Papers Reveal How Wealthy Americans Hid Millions Overseas," see <http://www.nytimes.com/2016/06/06/us/panama-papers.html?smprod=nytcore-ipad&smid=nytcore-ipad-share&r=0>
- May 13, 2016 American Banker, "Beneficial Ownership Rule Riddled with Loopholes, Experts Say" (about a new FinCEN regulation on customer due diligence), please see <http://www.castconsultants.com/wp-content/uploads/2016/07/>

[Beneficial-Ownership-Rule-Riddled-with-Loopholes-Experts-Say American-Banker.pdf](#)

- May 12, 2016 IA Watch, “FinCEN provides two years for firms to implement new customer due diligence steps” (about a new FinCEN regulation that applies to certain financial institutions but not investment advisers (IAs)).
- May 9, 2016 TRT World News, the state English language TV channel of Turkey, live TV interview on Panama Papers, please see https://www.youtube.com/watch?v=74VSvbPm1_Q
- April 11, 2016 TRT World News, the state English language TV channel of Turkey, live, TF interview on AML issues, please see <https://www.youtube.com/watch?v=7sAhU9J7Now>
- April 6, 2016 Law360, “Panama Papers Bring Law Firm Ethics Controversy to Fore,” please see <https://www.law360.com/articles/780221>
- April 4, 2016 The Wall Street Journal Risk & Compliance Journal Morning Risk Report, “Panama Leaks Show Need for Account Scrutiny.”
- April 4, 2016 ACAMS|Moneylaundering.com News, “Panama Papers’ Leak to Spur Governmental Inquiries.” For a copy of the article, please see <http://www.acamstoday.org/panama-papers-leak-to-spur-governmental-inquiries/>
- January 20, 2016 Compliance Week, “Why is Treasury Cracking Down on Big, Cash-Only Real Estate Transactions?” (about FinCEN Geographic Targeting Orders for New York City and Miami), please see <http://www.jdsupra.com/legalnews/why-is-treasury-cracking-down-on-big-ca-77076/>
- January 14, 2016 American Banker, “Banks Prove Willing to Band Together Under KYC Pressure” (about the SWIFT KYC Registry for use in correspondent banking), please see <http://www.americanbanker.com/news/bank-technology/banks-prove-willing-to-band-together-under-kyc-pressure-1078835-1.html>
- January 6, 2016 The Wall Street Journal Risk & Compliance Journal Morning Risk Report, “FinCEN’s New Targets” (about recent enforcement actions against a card club and a precious metals dealer), please see <http://www.jdsupra.com/legalnews/fincens-new-targets-47136/>
- December 15, 2015 ACAMS|Moneylaundering.com News, “Vatican See ‘No Real Results’ in Money Laundering Prosecutions: Watchdog Report” (about an EU report on the Vatican’s 2012 Mutual Evaluation).
- November 24, 2015 The Wall Street Journal Risk & Compliance Journal Morning Risk Report: “Terrorism Finance Hunt vs. Fin-Tech” (about aftermath of Paris attacks).
- November 24, 2015 The Wall Street Journal Risk & Compliance Journal, “Paris Attacks to Boost Money Laundering Enforcement.” For a copy of the article, please see <http://www.jdsupra.com/legalnews/paris-attacks-to-boost-money-laundering-94802/>

- October 29, 2015 ACAMS|Moneylaundering.com News, "Global Watchdog Group Set to Name Countries with Lax Terror Finance Rules" (about new FATF list; related to story immediately below).
- October 24, 2015 ACAMS|Moneylaundering.com News, "FATF to Amend Recommendations on Terror Finance and Nongovernmental Groups."
- October 6, 2015 ACAMS|Moneylaundering.com News, "In New Zealand, U.S. Financial Institutions Face Questions on Beneficial Ownership Controls."
- September 22, 2015 The Wall Street Journal Risk & Compliance Journal Morning Risk Report, "Time for Investment Advisers to Focus on AML."
- September 3, 2015 FinOps Report, "Registered Investment Advisers: FinCEN Says Welcome to the AML Party." For a copy of the article, please see <http://finops.co/regulations/rules/registered-investment-advisers-fincen-says-welcome-to-the-aml-party/>
- August 31, 2015 IA Watch, p. 1, "From best practice to potential mandate: FinCEN proposes AML rule for IAs" (about the FinCEN proposal for investment advisers (IAs)).
- August 27, 2015 Financial Crime 360, "FinCEN Proposes AML Rules for \$62 Trillion Investment Adviser Industry, But Pulls Back On Full Coverage."
- August 25, 2015 The Wall Street Journal Risk & Compliance Journal, "Treasury Proposes Money-Laundering Controls for Investment Advisers." For a copy of the article, please see <http://blogs.wsj.com/riskandcompliance/2015/08/25/treasury-proposes-money-laundering-controls-for-investment-advisers/tab/print>
- August 25, 2015 ACAMS|Moneylaundering.com News, "FinCEN Outlines New Plan to Police Investment Advisers."
- August 14, 2015 The Wall Street Journal Risk & Compliance Journal, "Bank Consultant Scrutiny Shows Their Ambiguous Role" (about NY DFS enforcement cases against consulting firms, including Promontory).
- August 7, 2015 The Wall Street Journal, p.1 of Markets section, "Rule Would Impel Big Funds to Strengthen Controls" (about impending announcement of FinCEN proposal to require RIAs to adopt an AML program and submit SARs).
- August 3, 2015 American Banker, "Promontory Suit Is a Reputational Catch-22" (about lawsuit against NY State Department of Financial Services).
- July 27, 2015 ACAMS|Moneylaundering.com News, "FinCEN Proposal for Investment Advisers Clears OMB Hurdle" (about possible FinCEN proposed regulation on AML program and SAR filing requirements for investment advisers). For a copy of the article, please see <http://www.jdsupra.com/legalnews/fincen-proposal-for-investment-advisers-99950/>

- July 7, 2015 Compliance Week, "U.S. Failures to Track Beneficial Ownership Create AML Headaches Internationally" (about FinCEN customer due diligence (CDD) proposal). For a copy of the article, please see <https://www.complianceweek.com/> and https://www.complianceweek.com/news/news-article/us-failures-to-track-beneficial-owners-create-aml-headaches-internationally#.VZxZh_IVgoI
- July 2, 2015 The Wall Street Journal Risk & Compliance Journal, "FATF Pushes Risk-Based Approach Toward Virtual Currencies, Services." For a copy of the article, please see <http://www.jdsupra.com/legalnews/fatf-pushes-risk-based-approach-toward-v-34460/>
- July 1, 2015 Financial Crime 360, "FATF Urging Countries to Analyze, Update laws Around Virtual Currencies, Give More Scrutiny to Non-profits Near Terror Hotspots." For a copy of the article, please see <http://www.acfcs.org/fatf-urging-countries-to-analyze-update-laws-around-virtual-currencies-give-more-scrutiny-to-non-profits-near-terror-hotspots/>
- July 1, 2015 ACAMS|Moneylaundering.com News, "FATF's Latest Round of Evaluations Proving Challenging for Some Nations, Says Group President" (about FATF's mutual evaluation process involving national risk assessments). For a copy of the article, please see <http://www.jdsupra.com/legalnews/fatfs-latest-round-of-evaluations-provi-65066/>
- June 17, 2015 Financial Crime 360, "Experts: \$4.5 million FinCEN penalty against small West Virginia bank is message to similar-sized operations to beef up compliance."
- June 15, 2015 Compliance Week, "FIFA Fallout Has Banks Fearing Due Diligence Failures." For a copy of the article, please see <https://www.complianceweek.com/news/news-article/fifa-fallout-has-banks-fearing-due-diligence-failures#.VX8WUPIViko>
- June 12, 2015 The Nikkei (Japan), "FIFA became too big to manage itself, now attention is focused on the possibility of relocating the site of World Cup." I was quoted as follows: "Many banks large and small, inside the US and around the world, have AML systems that need improvement. The fact that so many banks allowed wire transfers and other payments to occur without raising any questions, at least as far as we know, suggests that their AML systems are not sufficiently robust." For a copy of the article in Japanese, see <http://s.nikkei.com/1Gx2VXb>
- June 12, 2015 ACAMS|Moneylaundering.com News, "U.S. Publishes FATF-Mandated Risk Assessments Ahead of Mutual Evaluation." For a copy of the article, please see <http://www.moneylaundering.com/OurProducts/Pages/NewsHighlight.aspx>
- June 2, 2015 Boston Business Journal, "State Street's Fed troubles mark beginning of long, potentially costly road" (about enforcement action for AML/CFT deficiencies). For a copy of the article, please see

<http://www.bizjournals.com/boston/news/2015/06/03/state-street-s-fed-troubles-mark-beginning-of-long.html>

- May 28, 2015 American Banker, "FIFA Scandal Will Test Banks' Anti-Money Laundering Liability." For a copy of the article, please see <http://www.americanbanker.com/news/national-regional/fifa-scandal-will-test-banks-anti-money-laundering-liability-1074580-1.html?zkPrintable=true>
- May 12, 2015 The Wall Street Journal Risk & Compliance Journal, "U.S. Lawyers Are A Money Laundering Blindspot, Some Argue." For a copy of the article, please see <http://blogs.wsj.com/riskandcompliance/2015/05/11/u-s-lawyers-are-a-money-laundering-blindspot-some-argue/>
- March 16, 2015 The Wall Street Journal Risk & Compliance Journal, "Commerzbank Case Shows Regulator Focus on Individuals." For a copy of the article, please see <http://blogs.wsj.com/riskandcompliance/2015/03/16/commerzbank-case-shows-regulator-focys-on-individual-liability/>
- February 20, 2015 The Wall Street Journal Morning Risk Report, "HSBC Can't Shake Echoes of Past Misconduct." For a copy of the article, please see <http://blogs.wsj.com/riskandcompliance/2015/02/20/the-morning-risk-report-hsbc-cant-shake-echoes-of-past-misconduct/>
- January 12, 2015 IA Watch Weekly Briefing, p. 6, "Lawsuit seeks to enforce \$1 million fine on former CCO in AML case" (about FinCEN enforcement action against MoneyGram CCO).
- January 12, 2015 IA Watch, "Stepped up AML enforcement points to need to implement critical best practices."
- December 5, 2014 ACAMS\Moneylaundering.com News, "Rolling Out new Effectiveness Score, FATF Gives Spain High Marks for Compliance" (about the first FATF Mutual Evaluation Report under the new FATF Recommendations).
- November 6, 2014 Financial Crime 360, "Global push for beneficial ownership transparency hits headwinds of political sparring and strained resources."
- October 20, 2014 Money Laundering Bulletin (London), "All in the price – the hidden cost of trade-based money laundering."
- August 7, 2014 Hindu Business Line (India), "Standard Chartered faces renewed scrutiny by US anti-money laundering regulator" online and also in newspaper, p. 10; please see <http://www.thehindubusinessline.com/opinion/columns/vidya-ram/standard-chartered-faces-renewed-scrutiny-by-us-antimoney-laundering-regulator/article6288337.ece>
- June 30, 2014 fastFT, "Comment: Will BNP Paribas penalty wake banks up?" For a copy of the article, please see <http://www.ft.com/fastft/2014/06/30/post-174222/>
- April 3, 2014 ACAMS\Moneylaundering.com News, "U.S. Formally Launches AML Assessment Ahead of FATF Evaluation."

- March 20, 2014 American Banker, "Associated Could Find M&A Benefit from Lifted Reg Order" (about the potential effect of Associated Banc-Corp's clean bill of health on an OCC BSA/AML enforcement order).
- March 10, 2014 IA Week, p. 1, "Best practices to rely upon before you take on a client from outside the U.S." (about conducting enhanced due diligence on foreign clients).
- January 10, 2014 IAWatch.com, "Record \$2 billion settlement showcases J.P. Morgan's Madoff compliance failures."
- January 7, 2014 The Wall Street Journal Risk & Compliance Journal, "J.P. Morgan's Madoff Warnings Caught in Silos" (about the criminal and civil enforcement actions against the bank).
- December 18, 2013 The Wall Street Journal Risk & Compliance Journal, "The Morning Risk Report: AML Scrutiny Falls on Bank Acquirers" (about Federal Reserve Board enforcement action against M&T Bank delaying acquisition of Hudson City Bank).
- December 10, 2013 The Wall Street Journal Risk & Compliance Journal, "The Morning Risk Report: J.P. Morgan's Anti-Money Laundering Controls Scrutinized" (about allegations relating to Bernie Madoff).
- December 9, 2013 Oil Express, "Legal: Feds Seize \$70K from Gas Station Because of Bank Deposit Practices" (about a structuring case).
- August 13, 2013 Moneylaundering.com News, "US Could Face Tough Assessment Next Time Around, Say Critics" (about mutual evaluation of US by Financial Action Task Force).
- July 28, 2013 The Wall Street Journal, "SAC Operating Plan to Be Negotiated" (about US Department of Justice civil forfeiture case against SAC hedge fund).
- June 24, 2013 BD Week, p. 1, "Enforcement Alert: Agreement shows that regulators can scrutinize consultants (about the New York State Department of Financial services fine against Deloitte; see also entry for American Banker article, June 19th, below).
- June 20, 2013 American Banker, "Lawsky's Bank of Tokyo Action Could Unsettle Regulators Globally" (about New York State Financial Services Department enforcement action).
- June 19, 2013 American Banker, p. 1, "What the Deloitte Crackdown Means for Banks" (about the New York State Department of Financial Services fine against Deloitte), available at: <http://www.castconsultants.com/wp-content/uploads/2013/06/What-the-Deloitte-Crackdown-Means-for-Banks-American-Banker-Article.pdf>
- June 11, 2013 Moneylaundering.com News, "Citing Risks in Afghanistan, Basel Institute Updates AML Index."

- April 23, 2013 Moneylaundering.com News, "FATF's Call for National Assessments Will Be a High Hurdle for Some" (about new FATF Recommendation mandating national risk assessments for AML/CFT).
- April 12, 2013 American Banker, "M&Ts Regulatory Snag Could Test Shareholder Patience" (about BSA/AML concerns in merger with Hudson City Bancorp); article reprinted at: <http://www.castconsultants.com/2013/04/casting-an-eye-on-banking-newsletter-april-17-2013/>
- April 2013 MoneylaunderingBulletin.com News, "Checking on Compliance – AML and Audit" (based on remarks made during a panel discussion on independent AML audits at the 18th Annual ACAMS AML and Financial Crime Conference in Hollywood, FL).
- April 2013 MoneylaunderingBulletin.com News, "Through the minefield" (about the 18th Annual ACAMS AML and Financial Crime Conference in Hollywood, FL and is based on remarks made during panel discussions on liability of board members and senior management, and on trade-based money laundering).
- February 27, 2013 MoneylaunderingBulletin.com News, "Impact assessment – FATF targets effectiveness" (about FATF's issuance of a new AML/CFT Methodology, see <http://www.fatf-gafi.org/media/fatf/content/images/FATF%20Methodology%2022%20Feb%202013%20.pdf>).
- February 22, 2013 Moneylaundering.com News, "FATF Outlines New Effectiveness Score, Rescinds Threat to Suspend Turkey" (about new FATF Methodology).
- February 11, 2013 MoneylaunderingBulletin.com News, "Fourth Directive – a way to go" (about the proposed European Commission Anti-Money Laundering Directive); article also appeared in March 2013 edition of Money Laundering Bulletin (London).
- February 1, 2013 Moneylaundering.com News, "Banks See Costs or Opportunities in FATF's Decision on Turkey's Membership" (about Turkey being placed on FATF ICRG list and possibly subject to further sanctions).
- January 21, 2013 BD Week, p. 1, "IA switches to states add wrinkle to BDs relying on IA customer ID programs" (about SEC no-action letter allowing broker-dealers (BDs) to rely on the Customer Identification Program (CIP) of investment advisers (IAs)).
- January 21, 2013 BD Week, p. 3, "AML reinstated in FINRA's examination priorities letter." December 19, 2012, Corruption Currents (Wall Street Journal blog), "Why Do Troubled Banks Hire Former Regulators?" available at: <http://blogs.wsj.com/corruption-currents/2012/12/19/why-do-troubled-banks-hire-former-regulators/>
- December 12, 2012 The Telegraph (UK), "Has America got it in for British banks?" (about the HSBC deferred prosecution agreement on money laundering violations)

available at: <http://www.telegraph.co.uk/finance/financial-crime/9738801/Has-America-got-it-in-for-British-banks.html>

- December 10, 2012 Centralbanking.com (London), “EBA finds distortion in e-money practices across EU” (about European Banking Authority report on gaps in implementation of the 2nd European Union E-money Directive) available at: <http://www.centralbanking.com/central-banking/news/2230917/eba-finds-distortion-in-emoney-practices-across-eu>
- November 19, 2012 Corruption Currents (Wall Street Journal blog), “What Would You Change about the U.S. AML System?” available at: <http://blogs.wsj.com/corruption-currents/2012/11/19/what-would-you-change-about-the-u-s-aml-system/>
- October 19, 2012 IA Watch, p.1, “Mysterious case raises questions about IA’s compliance steps to prevent hacking” (IA refers to investment adviser; the article is about an SEC enforcement action against Adam Bielski).
- October 16, 2012 Moneylaundering.com News, “In Internal Audits, Transparency and Parameters Can Prove Crucial, Consultants Say” (about independent AML audits).
- September 19, 2012 German Public Radio interview, “How it works (for German banks, too): Haqqani Network placed on US terror list” (about the OFAC Specially Designated Nationals (SDN) list).
- September 3, 2012 BD Week, p. 6, “New FinCEN director could increase agency’s aggressiveness,” (about the appointment of Jennifer Shasky Calvery to head FinCEN).
- August 22, 2012 Hindu Business Line (India), p. 8, “Are UK banks being unfairly targeted?” (quoted in column about the Standard Chartered case), available at: www.thehindubusinessline.com/opinion/columns/vidya-ram/article3803908.ece
- August 14, 2012 Moneylaundering.com News, “Standard Chartered’s Controversial \$340 million Settlement Sets Unwelcome Precedent for Banks.”
- August 10, 2012 Wall Street Journal, p. C1, “Regulators Seek Unity in U.K. Bank Talks” (about Standard Chartered case).
- August 8, 2012 The International Business Times (UK), “Standard Chartered Scandal: The British Need to Stop Whining and Start Investigating” (column includes quote from August 7th Telegraph article below), available at: www.ibtimes.com/articles/371737/20120808/london-new-york-financial-scandal-libor-regulators.htm
- August 7, 2012 Paris Match, “Les Liaisons Dangereuses d’une Banque avec l’Iran” (article includes French translation of quote from August 7th Wall Street Journal article below), available at: www.parismatch.com/Actu-Match/Economie/Actu/Les-liaisons-dangereuses-d-une-banque-avec-l-iran-415361/

- August 7, 2012 The Wall Street Journal, “Standard Chartered wegen Iran-Geschäften am Pranger” (German version of article below), available at: www.wallstreetjournal.de/article/SB10000872396390443792604577574281621390806.html
- August 7, 2012 The Wall Street Journal, “Standard Chartered Examined Over Iran Dealings” (front page article about allegations of OFAC violations), available at: <http://online.wsj.com/article/SB10000872396390443659204577573083194243776.html>
- August 7, 2012 CNN International, live televised interview on Standard Chartered OFAC violations allegations. Partial transcript available at: <http://transcripts.cnn.com/TRANSCRIPTS/1208/07/ctw.01.html>
- August 7, 2012 The Telegraph (UK), “Standard Chartered: UK bank faces ‘Frankenstein monster’ in US over money laundering allegations,” available at: www.telegraph.co.uk/finance/newsbysector/banksandfinance/9460388/Standard-Chartered-UK-bank-faces-Frankenstein-monster-in-US-over-money-laundering-allegations.html
- August 7, 2012 CBC Radio (Canada), interviewed on radio program As It Happens; also aired on National Public Radio (NPR) in the US, interview on Standard Chartered OFAC allegations. The segment may be heard in Part Two of the program, at 03:40, available at: www.cbc.ca/asithappens/popupaudio.html?clipIds=2264877645,2264878986 or www.cbc.ca/asithappens/episode/2012/08/07/the-tuesday-edition-41/
- July 17, 2012 BBC TV World News, live televised interview on HSBC AML/OFAC case that was the subject of a US Senate Hearing on the same day.
- July 17, 2012 Moneylaundering.com News, “OCC Will Revise AML Examinations, Expand List of Compliance Violations” (about the OCC’s changes in the CAMELS rating as a result of HSBC compliance failures).
- June 18, 2012 IA Week, “Suggestions on what to do when it comes to customer due diligence” (about investment adviser (IA) responsibilities for CDD in light of new FATF Recommendations).
- June 4, 2012 BD Week, “Enforcement Alert: Make sure AML exception reports you get from clearing firms are up to snuff” (about FINRA enforcement action against Newport Coast Securities).
- May 2012 The Suit Magazine, p. 43 “It All Comes Out in the Wash: Anti-money laundering expert turns to social media to boost business reach” (about my use of LinkedIn). <http://www.thesuitmagazine.com/law-politics/legal/21739-it-all-comes-out-in-the-wash.html>
- April 13, 2012 German Public Radio interview, “Why did the US State Department put the Holy See on Money Laundering List?” (about the 2012 International Narcotics Control Strategy Report).

- March 28, 2012 Moneylaundering.com News, “Expected Guidance on ‘Simplified’ Diligence Likely to Closely Follow FATF’s Lead” (about the US Treasury Department’s forthcoming guidance).
- February 18, 2012 Moneylaundering.com News, “FATF Revises AML Standards, Blacklists” (about the newly revised FATF 40 Recommendations).
- February 13, 2012 BD Week, “Enforcement Alert: Settlement shows need for solid onboarding procedures for AML purposes” (about FINRA case involving an AML compliance officer for a US brokerage firm who did not conduct proper customer due diligence and monitoring of Chinese clients).
- February 7, 2012 Moneylaundering.com News, “Fewer Recommendations, Higher Expectations Will Be Theme of FATF’s Revisions” (about the impending revision of the FATF Recommendations).
- 2012 The Enforcement Alert Book: Stories of Enforcement cases that highlight compliance pitfalls to avoid, p. 27.
- January 4, 2012 Moneylaundering.com News, “In 2012, Unregistered MSBs, Iran Sanctions and New Rules Will Loom Large, Say Industry Experts” (predictions for 2012).
- December 30, 2011 Moneylaundering.com News, “In 2011, Banks Fretted Over Sanctions, Tax Investigations and Political Changes” (a retrospective look at 2011)
- November 14, 2011 BD Week, p. 1, “Some things to remember as you approach your annual CEO certification” (about FINRA requirement of an independent AML audit for broker-dealers).
- October 2011 Money Laundering Bulletin (London), p. 11, “Tax and Wire Traps” (about FATF’s consideration of tax evasion as a predicate crime).
- September 4, 2011 Himalayan Times (Kathmandu, Nepal), “Five-year strategic plan to fight money laundering” (mentioned as being part of IMF team), available at: <http://www.thehimalayantimes.com/fullNews.php?headline=Five-year+strategic+plan+to+fight+money+laundering&NewsID=301679>
- August 1, 2011 BD Week, p. 1, “Enforcement Alert: Settlement shows need to focus on anti-money laundering basics” (about a FINRA enforcement case against an AML compliance officer who was fined and suspended as a result of AML violations).
- July 2011 Collaboration for Innovation: The Business Process Management Perspective, White Paper, by Subroto Gupta, Vice President, GENPACT (NYSE:G) on the use of open and closed professional networks.
- June 2011 Money Laundering Bulletin (London), p. 4, “Risk Based Approach – FATF to set the standard” (about revisions to the FATF Recommendations).
- June 6, 2011 BD Week, p. 1, “FINRA exam priorities letters are good predictors of cases, study reveals” (about a law firm study of FINRA cases).

- April 11, 2011 IA Week, p. 4, “Before you land a foreign national as a client, engage in some best practices.”
- March 21, 2011 BD Week, p. 1, “Beware of potential for fraudulent charities collecting money for Japan” (about conducting customer due diligence to avoid fraudsters).
- February 4, 2011 Corruption Currents (Wall Street Journal Blog), “Indonesia Marks a First in AML Enforcement,” available at: <http://blogs.wsj.com/corruption-currents/2011/02/03/indonesia-marks-a-first-in-aml-enforcement/>
- February 2011 Money Laundering Bulletin (London), p. 15, “Convenience costs – prepaid cards” (about the FinCEN proposal to impose AML requirements on prepaid cards).
- January 17, 2011 BD Week, p. 1, “Due diligence on IAs must be performed before relying on their CIPs” (about the latest SEC no-action letter allowing broker-dealers to rely on the customer identification programs (CIPs) of investment advisers (IAs)), available at: <http://wallstreetconsultingservices.com/Jan17BDW.pdf>
- December 30, 2010 Moneylaundering.com News, “Effectiveness of Vatican AML Law Will Hinge on Enforcement, Say Analysts.”
- December 17, 2010 Moneylaundering.com News, “Asset Forfeiture Measure Will Mean More Freeze Orders for U.S. Banks” (about the Preserving Foreign Criminal Assets for Forfeiture Act of 2010).
- December 6, 2010 BD Week, p. 1, “Enforcement Alert: Case shows need for diligence when dealing with risky customers” (about FINRA enforcement action against York Securities).
- November 2010 Financial Monthly Report, NTT Data AgileNet L.L.C., interview on AML/CFT issues in the US and internationally (in Japanese).
- October 27, 2010 Moneylaundering.com News, “FATF Proposes Revising Recommendations to Include Tax Crimes, Domestic PEPs” (about Financial Action Task Force (FATF) proposal).
- October 25, 2010 BD Week, p. 1, “Enforcement Alert: Case shows need to look at reps’ trading patterns over time” (about FINRA enforcement actions against two brokerage officials of Crocker Securities, LLC for failing to monitor trades).
- August 30, 2010 BD Week, p. 1, “Enforcement Alert: Make sure you test systems that monitor funds transfers, case shows” (about FINRA enforcement case against Edward Jones for failing to conduct testing), available at: <http://www.jdsupra.com/legalnews/enforcement-alert-make-sure-you-test-sy-50134/>
- August 9, 2010 BD Week, p. 6, “Email retention case shows violations can be costly for small firm” (about AML issues in FINRA enforcement case against Marsco Investment Corporation).

- July 27, 2010 Moneylaundering.com News, "FATF Says Governments Aren't Doing Enough to Combat Crime, Terrorism" (about FATF Global Money Laundering and Terrorist Financing Threat Assessment).
- July 19, 2010 BD Week, p. 3, "A look at FINRA enforcement fines shows costliness of violations."
- July 5, 2010 Poslovni Dnevnik (Zagreb, Croatia business daily), "No surprises from terrorists - they do commit common crimes" (interview and photo), available at: www.poslovni.hr/vijesti/delston-teroristi-rade-uobicajene-prijebare-151821.aspx
- June 29, 2010 Pranje Novca (Zagreb, Croatia newspaper), "Ross Delston: Postojali su signali da Madoff vara, ali su svi okretali od njih glavu!" [Translation: There were signals about Madoff, but everyone looked the other way]
- April 29, 2010 Moneylaundering.com News, "FFIEC 2010 Manual Revises Bulk Cash, Remote Deposit Captures and Other Provisions" (about the BSA/AML Examination Manual for Banks).
- April 26, 2010 BD Week, p. 1, "Enforcement Alert: Firm's small size doesn't shield it from FINRA fine for AML deficiencies" (about Brockington case).
- March 22, 2010 BD Week, p. 1, "Panel applies supervisory sanctions to AML case, dampening size of fine" (about FINRA enforcement action against Sterne, Agee).
- March 16, 2010 American Banker, "Looking for TARP Fraud, Government Thinks It's Found It" (about fraud case involving failed bank).
- March 15, 2010 IA Week, p. 3, "More questions for your firm may follow release of new AML guidance" (about the new guidance on beneficial ownership released by financial regulators and FinCEN).
- March 2010 Money Laundering Bulletin (London), p. 4, "Cash rich" (about the continued use of cash to launder money).
- February 24, 2010 Moneylaundering.com News, "FATF Asks Countries to Toughen Asset Forfeiture Laws, Look for Smuggled Bearer Negotiable Instruments."
- February 18, 2010 Moneylaundering.com News, "FinCEN Issues Red Flags for Trade-Based Money Laundering."
- February 15, 2010 IA Week, p. 5, "Your firm's AML risks may be small but you should ask about your B-D's program" (about FINRA enforcement actions against Penson and Pinnacle).
- February 8, 2010 BD Week, p. 1, "AML cases emphasize the need for automation, targeted risk assessment" (about FINRA enforcement actions against Penson and Pinnacle), available at: <http://www.mintz.com/search?q=Penson>

- February 5, 2010 Dow-Jones Newswires Column, “Compliance Watch: Money Laundering Detection Needs Human Touch” (about FINRA enforcement actions against Penson and Pinnacle).
- January 18, 2010 IA Week, p. 6, “SEC extends no-action letter, allowing B-Ds to rely on RIA procedures” (on broker-dealer (B-D) reliance on registered investment adviser (RIA) customer identification program (CIP) procedures).
- January 18, 2010 BD Week, p. 1, “No-action letter on CIP extended with clarification about standard” (on same subject as article immediately above, but focusing on broker-dealers).
- January 12, 2010 Moneylaundering.com News, “Looking Ahead in 2010, Industry Leaders Say Budgets Will Be Tight, While Duties Increase.”
- January 11, 2010 IA Week, p. 5, “Expiration nears for no-action letter affecting RIAs and AML” (on SEC no-action letter allowing broker-dealers to rely on the customer identification program (CIP) of registered investment advisers (RIAs)).
- December 21, 2009 BD Week, p. 3, “No-action letter on CIP set to end in weeks; SEC to review extension” (on same subject as article immediately above, but focusing on broker-dealers).
- November 2009 Money Laundering Bulletin (London), p. 15, “More or less in recession” (about the effect of the global recession on AML compliance).
- November 9, 2009 BD Week, p. 1, “Lessons from recent AML case can benefit differing kinds of firms” (about FINRA enforcement case against Scottrade).
- November 4, 2009 Moneylaundering.com News, “FATF Forms Group to Identify Uncooperative Jurisdictions, Boost AML Standards” (about the formation of the International Co-Operation Review Group by FATF).
- July 2009 AML Magazine (Australia), p. 14, “Combating trade-based money laundering risk – a call for a united front” (contains three references to law review article on TBML)
- June 17, 2009 Moneylaundering.com News, “Obama’s Reforms Could Mean AML Requirements for Hedge Funds, Creation of International Blacklists.”
- April 14, 2009 Moneylaundering.com News, “Private Equity Firms May Escape AML Oversight.”
- April 7, 2009 American Banker, “New Powers Mean New Questions for FDIC” (about Congressional bill to give FDIC powers to resolve non-bank financial institutions).
- March 13, 2009 Moneylaundering.com News, “Lawmakers Reintroduce Beneficial Ownership Bill” (about a bill previously introduced by Sen. Levin to require states to collect information about beneficial ownership of corporations).

- March 2009 Money Laundering Alert, “PEP Corruption Cases 'Exploding' as Banks, Jurisdictions Improve Monitoring” (about politically exposed persons – PEPs).
- February 2009 Money Laundering Bulletin (London), pp. 5 – 6, “The Professionals” (about the increasing status of AML professionals). See also a similar article published by International News Services, available at: <http://www.thefree library.com/Anti-money+laundering+is+become+a+profession%2c+but+a+universal+model...-a0264272112>
- February 2009 Money Laundering Alert, “Vetting Overseas AML Firms Means Rigorous Onsite Inspections: Consultants” (about due diligence and bank regulatory issues).
- February 13, 2009 Moneylaundering.com News, “U.S. Efforts to Train on Catching Terror Financiers Marred by Poor Coordination, Say Analysts” (about the US Government’s international training efforts).
- February 5, 2009 Moneylaundering.com News, “PEP Corruption Cases 'Exploding' as Banks, Jurisdictions Improve Monitoring” (about politically exposed persons – PEPs).
- January 23, 2009 Moneylaundering.com News, “Vetting Overseas AML Firms Means Rigorous Onsite Inspections: Consultants” (about due diligence and bank regulatory issues).
- January 16, 2009 Moneylaundering.com News, “Indian Outsourcing Scandal May Mean Renewed Scrutiny by U.S. Regulators” (about Satyam accounting misstatement).
- November 20, 2008 Moneylaundering.com News, “As Bank Holding Companies, Past Investment Banks Will Face Tougher AML Exams, Say Former Examiners.”
- November 10, 2008 IA Week, p. 4, “Six mistakes to avoid when setting up an AML program” (about AML compliance by registered investment advisers).
- November 10, 2008 Securities Industry News, “FinCEN Pulls Plug on Hedge Fund AML Rule.”
- November, 2008 Money Laundering Bulletin (London), p. 18, “The Study of Crime: Who are the Leading Criminologists in the AML Field?” (contains a brief bio but no quotes). The article was reprinted in University World News (December 7, 2008) as “Global: Universities offer AML advice” (name and bio mentioned in article).
- November 2008 Money Laundering Alert, p. 5, “Plethora of PEPs in French Arms Trafficking Case a Due Diligence Headache, Consultants Say” (‘PEPs’ are politically exposed persons).
- October 9, 2008 Moneylaundering.com News, “Plethora of PEPs in French Arms Trafficking Case a Due Diligence Headache, Consultants Say” (earlier version of article above).

- October 5, 2008 The Observer on Sunday (Cayman Islands), “The Emerging Threat of Trade-Based Money Laundering.”
- August 2008 Money Laundering Alert, p. 11, “Treasury vows support of West African group in war on money laundering, fraud.” (about a West African FATF-style regional body, the Inter-Governmental Anti-Money Laundering Group in Africa (GIABA)).
- August 18, 2008 IA Week, “Red flags that money laundering may be afoot, plus compliance tips” (about AML issues for investment advisers).
- August 11, 2008 Ignites.com – A Financial Times Service, “SEC Alerts Funds, Issues Anti-Money Laundering Tool.”
- July 21, 2008 Moneylaundering.com News, “Treasury vows support of West African group in war on money laundering, fraud” (earlier version of article above).
- April 2008 Money Laundering Alert, p.11, “Overhaul of U.S. regulations could result in exam consistency” (about Treasury Secretary Paulson’s proposal to merge banking regulators).
- March 31, 2008 Moneylaundering.com News, “Overhaul of U.S. financial regulations could boost consistency in AML exams” (earlier version of article above).
- February 14, 2008 Lipper HedgeWorld’s Accredited Investor Magazine, “Sovereign Wealth Funds: White Knights or Exotic Raiders?”
- December 18, 2007 Moneylaundering.com News, “Hedge funds operate free of AML programs five years after rules proposed.”
- September 19, 2007 American Banker, “UBOC AML Hit Wasn’t for Lack of Spending” (about the enforcement case against Union Bank of California).
- September 6, 2007 Moneylaundering.com News, “Proposal to revamp state beneficial owner disclosure rule falls short, some say” (about a proposal by the National Association of Secretaries of State to revise state incorporation laws).
- September 2007 Money Laundering Alert, p. 4, “European PEP standards may weaken anti-money laundering efforts” (about a UK regulation on politically exposed persons). An earlier version of the article appeared on August 20, 2007 in Moneylaundering.com News.
- August 1, 2007 Moneylaundering.com News, “Proposed legislation would criminalize ‘reverse’ money laundering” (about a House bill that would strengthen U.S. AML/CFT laws).
- July 16, 2007 Moneylaundering.com News, “U.S. Rep. Frank joins critics of SEC list linking companies, rogue states” (the list was subsequently suspended by the SEC).
- June 8, 2007 Moneylaundering.com News, “Jefferson case raises questions about scrutiny of U.S. politicians” (about the prosecution of Congressman Jefferson).

- April 16, 2007 Securities Industry News, "AML Leader Takes French Government Post" (about the resignation of the Executive Director of the Financial Action Task Force).
- April 4, 2007 American Banker, "Lawsuits May Boost Banks' Anti-Laundering Burden" (on class action suits against Arab Bank for terrorist financing).
- March 12, 2007 Securities Industry News Special Report, "AML Law for Venture Capitalists Still Under Study at FinCEN" (on proposed FinCEN rule for hedge funds), available at: www.actimize.com/index.aspx?page=news53 An earlier version of the article appeared on March 7, 2007 in Securities Industry News
- March 1, 2007 Moneylaundering.com News, "Senate bill would expand reach of U.S. money laundering laws."
- February 19, 2007 Moneylaundering.com News, "OCC cites foreign bank for weak OFAC, correspondent banking practices" (on Citic Ka Wah Bank, Ltd., Hong Kong).
- February 9, 2007 Diamond Intelligence Briefs Online, "U.S. Tax Officials: Biting Without Teeth
- February 2, 2007 Moneylaundering.com News, "IRS unprepared for jeweler examinations."
- January 30, 2007 Moneylaundering.com News, "FinCEN writes off \$5 million for failed database" (about BSA Direct).
- January 30, 2007 The Nikkei (the Wall Street Journal of Japan), interview on the US banking and anti-money laundering framework for foreign banks
- January 24, 2007 Lipper HedgeWorld's Accredited Investor Magazine, "Regulatory Outlook: Waiting for Another Amaranth" (about hedge fund registration and AML).
- January 22, 2007 Securities Industry News, "SEC Agrees with FinCEN on AML Data Exchange in Examinations" (on MOU between the two agencies).
- December 4, 2006 Securities Industry News, "FinCEN Door Revolves Again: 4th Director Search in 3 Years."
- November 21, 2006 Moneylaundering.com News, "Werner leaves FinCEN for job at Merrill Lynch."
- November 2006 Money Laundering Alert, "Blank FATF blacklist raises questions about its usefulness" (front page article on Myanmar's removal from the NCCT list).
- November 5, 2006 Lipper HedgeWorld News, "Election Day and Hedge Funds: A Lipper HedgeWorld Preview."
- October 19, 2006 Moneylaundering.com News, "Blank FATF blacklist raises questions about its usefulness" (on Myanmar's removal from the NCCT list).

- October 9, 2006 Securities Industry News, "Hedge Fund AML Mandates May Soon Be on the Way" (front page article on proposed FinCEN AML rules for hedge funds).
- October 2006 Ernst & Young Hedge Funds Update, p. 4 "IRS following SEC" (synopsis of August Hedge Fund Daily article).
- September 15, 2006 Moneylaundering.com News, "New data measures global corruption, governance" (on World Bank study).
- August 11, 2006 Lipper HedgeWorld News, "US May Expand Treasury Regulation" (on Senate subcommittee report on abuse of corporate vehicles in offshore financial centers).
- August 2006 Money Laundering Alert, p. 5, "FATF faults US corporate beneficial ownership information" (on FATF mutual assessment of US AML/CFT framework).
- August 2006 Money Laundering Alert, p. 4, "Compliance officers leaving hedge funds; when they're needed most" (on proposed FinCEN regulation for hedge funds).
- August 7, 2006 Institutional Investor's Hedge Fund Daily, "IRS: A Fate Worse Than The SEC?" (on AML examinations of unregistered hedge funds). For a copy of the article, please see: <http://www.institutionalinvestor.com/Popups/PrintArticle.aspx?ArticleID=1051195>
- August 2, 2006 Lipper HedgeWorld News, "IRS May Step in as Hedge Fund Examiner." Article quoted in Tax Notes, January 7, 2008, "Offshore Explorations: Caribbean Hedge Funds, Part 1." For the latter article, see <http://www.taxanalysts.com/www/features.nsf/Articles/35244A221EDD1BF7852573D00071118E?OpenDocument>
- July 28, 2006 Moneylaundering.com News, "Revised BSA manual less vague, adds details on risk, insurance" (on FFIEC BSA/AML Examination Manual).
- July 20, 2006 Moneylaundering.com News, "AML, SEC compliance a roller coaster ride for hedge funds" (on proposed FinCEN regulations).
- July 12, 2006 Moneylaundering.com News, "FATF: Lack of corporate transparency hurts US financial investigations" (on the FATF mutual assessment of the US).
- June 2006 Money Laundering Alert, p. 11, "US institutions increase PEP spotlight on domestic politicians" (on politically exposed persons or PEPs).
- June 5, 2006 Lipper HedgeWorld News, "The AML Waiting Game Continues" (on proposed FinCEN regulations for hedge funds).
- May 24, 2006 Moneylaundering.com News, "Drug dealer's wife uses old-fashioned structuring – and gets caught."
- May 23, 2006 Moneylaundering.com News, "FinCEN deficiencies outlined in inspector general report."

- May 9, 2006 Moneylaundering.com News, “Finance industry shines spotlight on U.S. politicians” (an earlier version of the article referred to above that appeared in the June Money Laundering Alert). For a copy of the article, please see: http://www.world-check.com/media/d/content_pressarticle_reference/PEPN_OTPERP.pdf
- April 25, 2006 Moneylaundering.com News, “U.S. GAO: Lax state rules allow creation of shell companies” (on state law requirements on disclosure of company ownership).
- February 22, 2006 TheStreet.com, “Wash Cycle” (on FinCEN proposed AML regulation for hedge funds). For a copy of the article, please see: <https://www.thestreet.com/story/10269769/2/hedge-fund-report-another-way-to-play-verizon.html>
- November 2005 Money Laundering Alert, p. 10, “On the Job – Countries need entire AML package to help reach compliance” (full page interview).

**ROSS S. DELSTON, CAMS: SPEAKING ENGAGEMENTS,
2000 – PRESENT**

- May 2018 (forth-coming)** **The Canadian Institute’s 17th Annual Forum on Anti-Money Laundering and Financial Crime; Toronto, Canada**
Will be co-panelist discussing trade-based money laundering (TBML) issues, including trade finance, red flags and terrorist financing.
- May 2018 (forth-coming)** **CTF and TBML: Identifying Questionable Transactions within Global Trade Businesses, Webinar, Association of Certified Anti-Money Laundering Specialists**
Will discuss trade-based money laundering and counter-terrorist financing as part of a two-hour webinar with a co-presenter from Federal law enforcement.
- March 2018 (forth-coming)** **Money laundering via Bitcoin, Ethereum, and Other Cryptocurrencies: Regulatory, Law Enforcement and Intel Perspectives, Federal Deposit Insurance Corporation; Seidman Center, Arlington, VA**
Co-panelist at 90-minute session covering regulatory issues and enforcement actions relating to cryptocurrencies.
- March 2018 (forth-coming)** **Money Laundering Through Real Estate, One-Day Conference, Terrorism, Transnational Crime and Corruption Center (TraCCC), George Mason University; Arlington, VA**
Panelist on FATF Recommendations, the international standards on money laundering, as applied to real estate sector.
- February 2018 (forth-coming)** **The U.S. AML/CFT Framework: Extraordinary Complexity Coupled with Significant Compliance Gaps, Webinar for employees of European AML solutions company**
An introduction to the U.S. regulatory and compliance framework for IT and marketing departments.

- February 2018 (forthcoming)** **What Every Central Banker Should Know About Trade-Based Money Laundering: Risk Factors, Red Flags & Compliance Challenges, Lecture, Reserve Bank Staff College; Chennai, India**
Will discuss major issues in TBML before an audience from the Reserve Bank of India, the central bank of India, and faculty from the Staff College for the Bank.
- January 2018 (forthcoming)** **AML Practitioners Panel, Anti-Corruption Enforcement and the Public Sector, International Anti-Corruption Academy, The World Bank; Washington, DC**
Will discuss trade-based money laundering as one of three panelists covering various aspects of AML and anti-corruption issues as well as career issues.
- January 2018** **Money laundering via Bitcoin, Ethereum, and Other Cryptocurrencies: Regulatory, Law Enforcement and Intel Perspectives, Women in Housing and Finance; Washington, DC**
Co-panelist at 90-minute brown bag lunch session covering regulatory issues and enforcement actions relating to cryptocurrencies.
- November 2017** **Bitcoin and Other Cryptocurrencies, Half Moon Education Inc, Arlington, VA**
One-hour session on AML compliance issues relating to Bitcoin, including exchangers and their status as MSBs as part of full-day program for lawyers, accountants and other professionals. For more information, please see <https://www.halfmoonseminars.org/seminars/130935/bitcoin-and-other-cryptocurrencies/arlington-va>
- June 2017** **Building an Effective AML Compliance Program; Lectures at the Executive Master of Arts in Financial Integrity (MAFI) Program, Case Western Reserve University School of Law; Cleveland, OH**
Adjunct Professor and co-lecturer for three-day session on US and international standards on effective AML programs including customer due diligence, trade-based money laundering, and AML program issues. For more information, please see <http://law.case.edu/Academics/Degrees/Masters-in-Financial-Integrity>
- May 2017** **Recent Developments in AML and OFAC Compliance, NSCP Spring Compliance Conference, National Society of Compliance Professionals; New York City**
Panelist on session for securities industry covering customer due diligence (CDD) rule, beneficial ownership, SAR filing trends and best practices. For more information, please see <https://nscpconferences.org/events/new-york/>
- May 2017** **BAFT Financial Crime Compliance Workshop – North America; Miami, FL**
Speaker on trade-based money laundering and customer due diligence (CDD) issues for separate workshop following BAFT annual meeting below; for an article and video on the panel, please see <http://www.gtreview.com/news/americas/money-laundering-needs-collective-response-video/>
- May 2017** **2017 BAFT Global Annual Meeting – The Americas: Rise to a New Era, Bankers Association for Finance and Trade; Miami, FL**
Panelist on practical issues for bankers relating to trade-based money laundering. <https://baft.org/events/show-event?id=3015248&formtype=Registrant>

- April & June 2017** **Why LinkedIn is crucial to your career, your profession and your future: Ten things you should know about LinkedIn to make it work for you in ways that Facebook and Twitter can't, sponsored by PwC (June 2017) and an earlier event (April 2017) by Women in Housing and Finance; Washington, DC**
Spoke about the uses of LinkedIn for client development purposes.
- April 2017** **An AML Blueprint: Tightening Controls and Satisfying FinCEN IA Compliance: The Full 360° View – Compliance Solutions for a Rapidly Changing Regulatory World; Washington, DC**
Panelist on session for investment advisers. For more information, please see <http://iawatchconferences.com/iawatch3602017/index.html>
- February 2017** **Trends in Trade-Based Money Laundering (TBML): Detection, Investigation and Prosecution; U.S. Study Tour on CFT Investigations for Law Enforcement for the Jordan Public Service Directorate, sponsored by the Financial Services Volunteer Corps (FSVC); New York**
Sole speaker at two-hour session on TBML and terrorist financing.
- January 2017** **There's More to Law than Lawyering in the Financial Services Industry, Women in Housing and Finance; Washington, DC**
Panelist on professional careers in financial services.
- December 2016** **Preventive Measures; Lectures at the Executive Master of Arts in Financial Integrity (MAFI) Program, Case Western Reserve University School of Law; Cleveland, OH**
Adjunct Professor and co-lecturer for three-day session on customer due diligence (CDD), enhanced due diligence (EDD), and designated non-financial businesses and professions (DNFBPs) for inaugural entering class of MAFI program.
- December 2016** **AML Unplugged, Northern Ohio ACAMS Chapter; Cleveland, OH**
Moderated informal lecture and Q&A by Andrea Gacki, then Acting Deputy Director, Office of Foreign Assets Control (OFAC).
- November 2016** **ACFE & ACAMS 2016 AML/Fraud Conference; Miami, FL**
Panelist on trade-based money laundering along with Assistant Florida State Attorney to discuss red flags, compliance issues and recent law enforcement cases.
- November 2016** **5 Things Every Compliance Officer Should Know About Trade-Based Money Laundering (TBML) Risks; Webinar, Interactive Learning Group, hosted by the National Society of Compliance Professionals**
Co-presenter with senior Citibank executive on TBML fundamentals and red flags.
- November 2016** **CAMS Examination Preparation Seminar, Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
Sole speaker at one-day seminar for employees of major U.S. bank.
- October 2016** **CAMS Examination Preparation Seminar, Association of Certified Anti-Money Laundering Specialists (ACAMS); Toronto, Canada**
Sole speaker at one-day seminar for attendees at conference.

- July 2016** **Advanced Bank Secrecy Act /Anti-Money Laundering (BSA/AML) Specialists Conference, Federal Financial Institutions Examination Council (FFIEC), Seidman Center; Arlington, VA**
Lectured on trade-based money laundering (TBML) at one-hour session as part of two and one-half day course for 175 Federal and state bank examiners. For a copy of the agenda, please see <http://www.ffiec.gov/exam/ffiec2016.pdf>
- June & July 2016** **CAMS Examination Preparation Course, Virtual Classroom, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Principal lecturer on two-hour interactive video sessions (Sessions 3 and 5) on international standards and AML programs as part of six-session course
- June 2016** **CAMS Examination Preparation Seminar, Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
Sole speaker at one-day seminar for employees of major foreign bank.
- May 2016** **Achieving AML Success in Light of FinCEN’s Coming Mandate, Webinar, IA Watch**
Panelist on FinCEN proposal to require an AML Program and SAR filing for Investment Advisers (IAs). IA Watch is a leading trade publication. See <http://www.iawatch.com/conferences/A2670/>
- May 2016** **2016 Bank Secrecy Act Conference, State Bar of Nevada; Las Vegas**
Moderator and panelist on “FATF Mutual Evaluation & Politically Exposed Persons.” For a copy of the bios and presentations, please see: <https://www.nvbar.org/wp-content/uploads/BSA-Conference-Materials.pdf>
- April 2016** **Brown Bag Lunch: Trade-Based Money Laundering – A Supply Chain Nightmare for Banks and Beyond, Women in Housing and Finance; Washington, DC**
Sole presenter at 60-minute program for Washington professionals. See: http://www.whfdc.org/calendar_day.asp?date=4/28/2016&event=777
- April 2016** **Toward a More Safe and Secure World: Combating International Crime, A Regional Project for South Asia, International Visitor Leadership Program, U.S. State Department; Washington, DC**
60-minute briefing on U.S. laws for group of four FIU, police and law enforcement officials from Bangladesh as part of their five-week U.S. study tour.
- April 2016** **Seminar on Strengthening Legal Frameworks for Bank Resolution, Deposit Insurance and Financial Crisis Management to Promote Financial Stability, International Monetary Fund; Accra, Ghana**
One of two main speakers for five-day program attended by lawyers, examiners and economists from central banks of five West African countries.
- March 2016** **CAMS Examination Preparation Course, Virtual Classroom, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Subject matter expert on two-hour interactive video session (Session 3) on international standards and best practices as part of six-session course

- March 2016** **The U.S. Experience in Combating Money Laundering and Fiscal Crimes, A Project for Ukraine, International Visitor Leadership Program, U.S. State Department; Washington, DC**
Hosted group of five Ukrainian FIU and law enforcement officials at my home for a 90-minute keynote briefing on US law to start their three-week U.S. study tour.
- February 2016** **IA Watch Annual Conference for Investment Advisers: Mastering SEC Rules and Solving Your Toughest Compliance Challenges; Washington, DC**
Panelist on “Achieving AML Success in Light of FinCEN’s Coming Mandate (about FinCEN proposal requiring an AML Program and SAR filings for Registered Investment Advisers (RIAs)). IA Watch is a leading trade publication. See: <http://www.iawatch.com/IACompliance2016/index.html>
- February 2016** **Combating Your Institution’s Biggest Threat: Trade-Based Money Laundering (TBML), Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
One of two speakers at second of two one-day workshops on TBML and trade finance; these sessions will be the fourth and fifth one-day workshops presented by ACAMS on this topic at which I’ve been a speaker. For more information, please see <http://www.acams.org/trade-based-money-laundering/>
- February 2016** **Private Client Forum Americas 2016, Legal Week; Hamilton, Bermuda**
Keynote speaker on second day, on “Money Laundering Risk, De-risking and the Pendulum of Risk Appetite,” and then panelist, “Implementing FATF AML/CFT Recommendations.”
- January 2016 (two sessions)** **CAMS Examination Preparation Course, Virtual Classroom, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Principal instructor for two two-hour interactive video sessions as part of six-session course.
- January 2016 & December 2015** **CAMS Examination Preparation Seminars, Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
Sole speaker at one-day seminar for employees of two major foreign banks.
- November 2015** **Money Laundering Controls for Bank in Trade Finance, Webinar, NoMoneyLaundering.com**
Co-presenter for one-hour webinar on Trade-Based Money Laundering (TBML) and Trade Finance.
- November 2015** **CAMS Preparation Course, Virtual Classroom, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Principal instructor for two-hour interactive video session as part of six-session course.
- November 2015** **Red Flags for Money Laundering: BSA/AML Compliance in the Real Estate Sector; Baltimore, MD**
Sole presenter for 30-minute video session that will constitute the annual BSA/AML training module for 300 employees of residential mortgage lender.

- October 2015** **Combating Your Institution’s Biggest Threat: Trade-Based Money Laundering (TBML), Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
One of two speakers at first of two one-day workshops on TBML and trade finance; these sessions will be the fourth and fifth one-day workshops presented by ACAMS on this topic at which I’ve been a speaker. For more information and a copy of the agenda, please see <http://www.acams.org/trade-based-money-laundering/>
- September 2015** **How FinCEN Is Overhauling a \$67 Trillion Industry with a New AML Rule, Webinar, Association of Certified Financial Crime Specialists (ACFCS)**
One of two speakers at one-hour webinar for ACFCS members.
- September 2015** **CAMS Examination Preparation Seminar, Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
Sole speaker at one-day seminar for employees of top ten U.S. bank.
- September 2015** **Trends in Trade-Based Money Laundering: Regulatory Expectations in Trade Finance and How They Grew, Northern New Jersey Chapter, Association of Certified Anti-Money Laundering Specialists (ACAMS); Newark, NJ**
Sole speaker at one-hour session.
- June 2015** **Plugging the gaps in KYC risk and compliance, Webinar, FierceFinanceIT**
One of two presenters in hour-long webinar on BSA/AML compliance issues. For the recorded webcast, see <http://www.fiercefinanceit.com/offer/june24>
- June 2015 (two sessions)** **CAMS Examination Preparation Course, Virtual Classroom, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Principal instructor for two video sessions, each two hours, of six-session course: Session 1, Money Laundering Risks in Depository Institutions, and Session 2, Money Laundering Risks in Non-Bank Financial Institutions and Non-Financial Institutions and Businesses.
- May 2015** **Inaugural Convening Conference on Financial Integrity, School of Professional Studies, Brown University; Providence, RI**
Facilitator of two breakout sessions on BSA/AML compliance issues.
- April 2015** **Ask a Financial Crime Expert: Why every financial institution and non-bank business – banks, broker-dealers, insurance companies, MSBs and gaming institutions – should be worried about the upcoming Mutual Evaluation of the USA by the FATF; Webinar, Association of Certified Financial Crime Specialists (ACFCS)**
Sole speaker at webinar for ACFCS members.
- October 2014** **Preparing for Pending Regulatory Changes affecting Registered Investment Advisers (RIAs), Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
One of three speakers on AML program requirements for RIAs and hedge funds.

- October 2014** **Combating Your Institution’s Biggest Threat: Trade-Based Money Laundering (TBML), Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
One of two speakers at one-day workshop on TBML and trade finance.
- June 2014** **Anti-Money Laundering and Counter-Terrorist Financing: Are International Standards Strong Enough to Stop Global Financial Crime? Cambodian Economic Association; Phnom Penh, Cambodia**
Sole speaker at 90-minute session for private and public sector economists.
- June 2014** **Seminar on Legal Issues Relating to Bank Resolutions, The World Bank; Chisinau, Moldova**
Sole speaker at 90-minute session for officials of the National Bank of Moldova (central bank), deposit insurance agency and ministry of finance.
- May 2014** **The New FATF Recommendations & the AML/CTF Methodology: Why risk assessments are the latest thing and what Financial Institutions, Countries, NGOs and Practitioners Need to Know About Them; Seminar/Webinar, International AML Committee, American Bar Association; Washington, DC**
Panelist on practical effect of new international standards. For the agenda, please see <http://www.rmkb.com/index.cfm/events/event-details/?pkid=107>
For audio of event, please see http://americanbar.org/content/dam/aba/administrative/international_law/the%20new%20fatf%20recommendations%20and%20the%20amlcft%20methodology.mp3
- March 2014** **Fundamentals of Trade Finance and Trade-Based Money Laundering and Red Flags for Trade-Based Money Laundering, New York Branch of Foreign Bank; New York City**
Co-presenter at three training sessions for senior executives and staff of trade finance and compliance units of branch of major foreign bank.
- February 2014** **Trade-Based Money Laundering (TBML): Identifying Red Flags and Tackling Mounting Challenges; Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
One of two speakers on TBML and trade finance.
- January 2014** **Regional Update: Examining AML Developments in the Caribbean; Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
One of two panelists, covered developments in the Financial Action Task Force (FATF) assessment process and listed countries such as Belize and Guyana.
- January 2014** **Financial Integrity Group AML/CFT Assessor Training, International Monetary Fund (IMF); Washington, DC**
Played role as Financial Intelligence Unit official as part of mock assessment for IMF lawyers and financial sector specialists; previously attended assessor training from FATF, World Bank and IMF in September 2013.
- October 2013 (two sessions)** **Combating Your Institution’s Biggest Threat: Trade-Based Money Laundering (TBML); Association of Certified Anti-Money Laundering Specialists (ACAMS); Chicago and New York City**
One of two speakers at workshops on TBML and trade finance.

- October 2013** **Inaugural Financial Crime & Compliance Seminar, Compliance; Hamilton, Bermuda**
Sole speaker at two sessions: Update on IMF Assessments and FATF Requirements, and Going Beyond Required Testing: How AML Audit Can Support Better AML Compliance and Best Practices to Improve AML Audit.
- September 2013** **What Every Lawyer Needs to Know About Anti-Money Laundering Compliance – It’s Not Just for Banks Anymore! The George Washington University Law School; Washington, DC**
Sole speaker at 90-minute CLE seminar. For video and slide presentation, see <http://video.law.gwu.edu:8080/ess/echo/presentation/b9e0b963-3131-4ac7-bad2-6039bc20bfaf>
- August 2013** **ACAMS Full-Day Seminars: A Sneak Peek at Fall Seminars, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Discussed significance of trade-based money laundering issues for banks.
- June 2013** **Best Practices and Practical Tips for Establishing and Running an Effective AML Program, Webinar, BD Week**
One of three panelists on program aimed at broker-dealers.
- May 2013** **Exploring the Evolution of Money Laundering and Financial Crime & Examining the Four Pillars of AML/BSA Programs, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
One of two speakers at webinar providing customized training for FDIC investigators in San Francisco and Seattle offices.
- May 2013** **Red Flags, Indicators, Anomalies and Bad Behavior: Observations on BSA/AML Compliance by Financial Institutions Large and Small; Webinar, Executive Office for US Attorneys, US Department of Justice**
Sole speaker at seminar and webinar for intelligence specialists, attorneys and paralegals at US Attorney’s Offices throughout the country and also from Asset Forfeiture and Money Laundering Section (AFMLS) of DOJ Criminal Division.
- April 2013** **An Overview of the US BSA/AML and OFAC Framework, seminar, as part of Combating Corruption and Financial and Organized Crime, A Project for Kosovo, US State Department International Visitor Leadership Program, Meridian International Center; Washington, DC**
Hosted group of Kosovar government officials from FIU and law enforcement.
- March 2013** **18th Annual International AML & Financial Crime Conference, Association of Certified Anti-Money Specialists (ACAMS); Hollywood, FL**
Panelist on independent AML audit issues and trade-based money laundering (TBML) and also a speaker at the post-conference workshop on Refining Your Institution’s Risk Assessment Processes.
- January 2013** **ACAMS Inaugural AML Risk Management Conference, Association of Certified Anti-Money Specialists (ACAMS); New York City**
Panelist at break-out session on Mitigating the Money Laundering Risks of Correspondent Banking.

- December 2012** **Getting to Know You: The Beneficial Ownership Rule and its Impact on Anti-Money Laundering and Office of Foreign Assets Control Compliance, The 2012 NLJ Regulatory Summit, National Law Journal; Washington, DC**
One of three panelists discussing FinCEN advance notice of proposed rulemaking on customer due diligence.
- November 2012** **Retooling Your Risk Assessment to Comply with Regulatory Requirements, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Co-panelist covering impact of new FATF Recommendations as well as FFIEC BSA/AML Examination Manual on risk assessment process.
- October 2012** **Trade-Based Money Laundering (TBML) —The Biggest Unprotected Threat Facing Financial Institutions and the Global Economy, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Panel discussion of money laundering, terrorist financing and terrorism threats.
- October 2012** **Global LPO Conference and Exhibition 2012, Global Outsourcing Association of Lawyers (GOAL); New York City**
Co-presenter on “Legal and compliance outsourcing in AML/CFT: How banks, broker-dealers, insurance companies, money services businesses, gambling casinos and law firms may benefit, and current outsourcing trends.”
- October 2012** **An Overview of the US BSA/AML and OFAC Framework, seminar as part of International Cooperation in Asset Forfeiture, A Project for Kazakhstan, US State Department International Visitor Leadership Program, Meridian International Center; Washington, DC**
Hosted group of Kazakh government officials from FIU and law enforcement.
- September 2012** **Independent BSA/AML Audit: 10 Common Mistakes to Avoid at Every Opportunity, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Co-presenter on issues of concern to compliance officers and regulators.
- August 2012** **The HSBC Case: Drugs, Terror, Iran and Other Deadly AML Sins, Webinar, AML Services International**
Moderated webinar; discussed risks relating to bulk cash shipments by banks.
- July 2012** **Trade-Based Money Laundering: Risks, Red Flags and Regulatory Trends, Seminar, FCI Training Day, Wells Fargo Bank; McLean, VA**
Spoke to group of 30 investigators and analysts from the McLean and Philadelphia offices of Wells Fargo’s Financial Intelligence Unit.
- July & August 2012** **Compliance Outsourcing in the AML/CFT (Anti-Money Laundering/Combating the Financing of Terrorism) Space, Webinars, Global Outsourcing Association of Lawyers (GOAL)**
Co-presenter on issues such as AML/CFT fundamentals, vendor due diligence, regulatory expectations, risk mitigation and training/certification.

- May 2012** **The New World of AML Compliance for Registered Investment Advisers (RIAs) and Hedge Funds, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Discussed possible FinCEN proposal for RIAs and hedge funds, as well as the SEC no-action letter for broker-dealers, customer identification programs (CIP), customer due diligence (CDD), and enhanced due diligence (EDD)
- May 2012** **Seminar on Red Flags, Indicators, Anomalies and Bad Behavior: Observations on BSA/AML Compliance by Financial Institutions Large and Small; Asset Forfeiture and Money Laundering Section (AFMLS), Criminal Division, US Department of Justice; Washington, DC**
Sole speaker at mandatory seminar for attorneys and investigators in money laundering unit of AFMLS.
- March 2012** **17th Annual Moneylaundering.com Anti-Money Laundering Conference, Association of Certified Anti-Money Laundering Specialists (ACAMS) Hollywood, FL**
Panelist at two break-out sessions, on trade-based money laundering (TBML) and on independent AML audits in the Caribbean.
- March 2012** **Symposium on Preventing the Financing of Terrorism, Institute for Global Security Law and Policy, Case Western Reserve University School of Law Cleveland, Ohio**
Participated as a member of expert group in the review of the conclusions of a draft World Bank research paper on terrorism finance; also moderated a panel entitled "Are the Regulated Doing Too Little or Too Much?" at public symposium sponsored by Case School of Law. See www.youtube.com/watch?v=TCzQryH7bzM
- February 2012** **The Asia/Pacific Group AML/CFT Mutual Evaluation of the Philippines: Improving Compliance with International Standards on Counter-Terrorist Financing; Combating Terrorism Harmonization Program Workshop, Defense Institute of International Legal Studies (DIILS), with funding provided by the US Department of Defense's Combating Terrorism Fellowship Program; Washington, DC**
Spoke and led discussion for a group of senior Philippine officials on US Government study tour.
- December 2011** **The FATF Recommendations and How They Grew: International Standards for Trust Companies, Bermuda Monetary Authority; Hamilton, Bermuda**
Main speaker at seminar for trust company compliance officers.
- December 2011** **The FATF Recommendations for the Legal Profession and How They Grew: What every professional needs to know about international standards on anti-money laundering and combating the financing of terrorism (AML/CFT), Bermuda Bar Association; Hamilton, Bermuda**
Main speaker at seminar.

- November 2011** **Inaugural ACAMS Anti-Money Laundering and Counter-Terrorist Financing Conference – Africa; Johannesburg, South Africa**
Principal speaker on independent AML audit panel; also panelist on supervisory issues. For a copy of my presentation on independent AML audit, see: <http://www.amlafrica.org/assets/materials/Independent%20Assessments.pdf>
- September 2011** **A Regional AML/CFT Workshop for West African Bar Associations sponsored by the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA); Niamey, Niger**
Main speaker on AML/CFT controls for the legal profession at three-day seminar for audience of lawyers, judges, and government officials, and representatives of two West African bar associations.
- August 2011** **Seminars on Enhancing Nepal’s AML/CFT Legislative Framework: Requirements of International AML/CFT Standards, International Monetary Fund; Kathmandu, Nepal**
One of two speakers for series of three seminars for government officials from FIU, law enforcement, ministries, and central bank.
- July 2011** **Seminar as part of Anti-Money Laundering Strategies: A Project for Qatar, US State Department International Visitor Leadership Program, Meridian International Center; Washington, DC**
Hosted group of Qatari government officials from FIU, law enforcement and central bank; presented and led discussion on US AML/CFT framework.
- July 2011** **Understanding the Risks, Red Flags and Mechanics of Trade-Based Money Laundering (TBML), Webinar, AML Services International**
Sole presenter on how trade transactions may be used not only to launder money but also to finance international terrorism.
- June 2011** **Seminars for Legal and Supervisory Departments of National Bank of Kyrgyz Republic on Banking Regulation, Enforcement and Resolutions, and on International Arbitration, World Bank Videoconferences; Washington, DC**
Main presenter at two seminars on banking issues and also moderated two seminars on international arbitration.
- May 2011** **Collaboration for Innovation, Podcast, GENPACT (NYSE:G)**
Panelist on use of social and expert networks for Indian company.
- May 2011** **Small Banks and Credit Unions: AML Regulatory Update and a Review of Emerging Challenges, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Co-presenter on BSA/AML issues, including independent audit, enforcement actions, and the FFIEC Examination Manual for smaller financial institutions.
- April 2011** **Seminar on Legal Issues in Bank Resolutions in Serbia, World Bank Videoconference; Washington, DC**
Sole lecturer in two-hour seminar for representatives of the Serbian central bank, deposit insurance agency, and ministry of finance.

- February 2011** **Internal Audits: Review Your Institution's AML Program to Assess Deficiencies, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Co-presenter on key issues arising from on-site examinations and enforcement actions.
- October 2010** **American Bankers Association/American Bar Association (ABA/ABA) Money Laundering Enforcement Conference; Washington, DC**
Panelist on international issues relating to AML/CFT, including the FATF's ICRG list of non-compliant countries.
- September 2010** **AML Programs Reloaded: Why Dodd-Frank May Change the Landscape for Registered Investment Advisers, Webinar, IA Week**
Panelist on BSA/AML issues for registered investment advisers (RIAs).
- August 2010** **What to Expect from Fraudsters and Money Launderers and How Best to Deal with Them Now, "Monumental Fight Against Fraud," Annual Conference, International Association of Financial Crimes Investigators; Washington, DC**
Panelist on BSA/AML issues and fraud.
- July 2010** **Training Workshop for Countries Undergoing an AML/CFT Mutual Evaluation, Caribbean Financial Action Task Force (CFATF) and International Monetary Fund; San Salvador, El Salvador**
Trainer and mentor at five-day interactive course for government officials from region on how to prepare for an AML/CFT mutual evaluation.
- July 2010** **How to Implement a Risk-Based Approach to AML and CFT, Central Banking Events, Incisive Media; Windsor, UK**
Sole presenter on issues arising from AML/CFT mutual evaluations and assessments of countries by FATF, FSRBs, IMF, and World Bank.
- June 2010** **International Anti-Money Laundering Conference: Techniques, Trends and Best Practices in Combating Money Laundering, Terrorist Financing and Terrorism, Zagreb School of Economics and Management and Croatian Chamber of Auditors; Zagreb, Croatia**
Program leader and principal lecturer at two-day presentation (seven hours total) on AML/CFT issues, including trends in money laundering and terrorist financing, risk assessment, AML audit, and trade-based money laundering. Please see: <http://www.zsem.hr/index.php/en/istrazivanje-i-razvoj-en/konferencije-en/2-uncategorised/451-medunarodna-konferencija-o-sprjecavanju-pranja-novca>
- June 2010** **Combating International Crime: The US Approach to White Collar Crime and Anti-Corruption Issues, International Visitor Leadership Program, US State Department, Meridian International Center, Meridian House; Washington, DC**
Presented on trade-based money laundering, terrorist financing and terrorism arising in the international trade sector, including preventive measures for exporters, importers, and all those in the supply chain.

- June 2010** **Caribbean Financial Action Task Force (CFATF) Plenary Meeting; Santo Domingo, Dominican Republic**
Presented on major issues relating to legal and institutional framework arising from AML/CFT assessment of Saint Vincent and the Grenadines by International Monetary Fund.
- May 2010** **Developing an Effective Trade-Based Money Laundering Program, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
One of two presenters in two-hour interactive webinar.
- April 2010** **Webinar for Lawyers: How to Advise Your Financial Institution Clients to Update and Strengthen Their Anti-Money Laundering Controls in 2010, ExecSense Webinars**
Sole speaker for one-hour webinar/podcast.
- March 2010** **Training Workshop for Countries Undergoing an AML/CFT Mutual Evaluation, Asia/Pacific Group on Money Laundering & International Monetary Fund, IMF-Singapore Regional Training Institute; Singapore**
Trainer and mentor at five-day interactive course for government officials from six Asian countries on how to prepare for an AML/CFT mutual evaluation.
- February 2010** **How to Prepare for Hedge Fund Regulations, Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Presented on deficiencies and red flags in hedge fund AML programs.
- January 2010** **Inside the IRS Criminal Investigation Division: An Interview with Eileen Mayer, outgoing Chief, IRS CI, US Capital Chapter, Association of Certified Anti-Money Laundering Specialists (ACAMS); Washington, DC**
Organized seminar and conducted interview.
- November 2009** **Workshop on Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT): Risk-based Supervision and Money Laundering in the Trade and Tax Sectors, International Monetary Fund – China Training Center; Dalian, China**
Spoke on “Trade-based Money Laundering: Indicators, Trends and Risks” at four-day interactive seminar for 45 Chinese government officials from central bank, financial intelligence unit, and customs agency.
- October 2009** **Seminar on Purchase and Assumption, Bridge Bank, and Other Bank Restructuring Transactions in Ukraine, sponsored by the World Bank and the International Monetary Fund, National Bank of Ukraine; Kiev**
Lecturer on legal issues at seminar for officials from central bank, ministry of finance, and deposit insurance agency.
- September 2009** **Training Workshop for Mutual Evaluation Assessors, sponsored by the US Treasury Department, World Bank and IMF; Washington, DC**
Mentor at training seminar on mutual evaluations using AML/CFT methodology for US government, World Bank and IMF personnel, as well as officials from FATF member countries such as US, Mexico and Sweden.

- July 2009** **Training Program for Assessors, sponsored by Inter-Governmental Action Group Against Money Laundering in West Africa (GIABA), Financial Action Task Force (FATF), World Bank and IMF; Accra, Ghana**
Lecturer and role player at five-day training seminar on mutual evaluations using AML/CFT methodology for 35 government officials from the region.
- July 2009** **Seminars on Banking Regulation and Legal Aspects of Bank Resolutions, sponsored by the World Bank and the Central Bank of Montenegro; Podgorica, Republic of Montenegro**
Sole lecturer at two seminars for 15 officials from central bank, ministry of finance, and deposit insurance agency.
- May 2009** **Enhanced Techniques and Best Practices to Take Your AML Program to the Next Level, Association of Certified Anti-Money Laundering Specialists (ACAMS); Washington, DC**
Sole lecturer at one-day seminar on issues such as effective AML programs, lessons learned from recent enforcement actions, and risk assessment techniques; drafted PowerPoint presentation.
- May 2009** **Seminar on Legal Issues relating to Problem Bank Resolutions in Serbia, sponsored by the World Bank and the National Bank of Serbia; Belgrade, Republic of Serbia**
Sole lecturer for one-day seminar to group of 15 government officials from the central bank, deposit insurance agency, and ministry of finance on international standards and best practices.
- May 2009** **US Study Tour for the Central Bank of Russia on AML Internal Controls, Financial Services Volunteer Corps; Washington, DC**
Two-hour lecture on BSA/AML compliance issues and international standards to group of 15 Russian central bankers.
- April 2009** **Outsourcing of AML Compliance: How Far Can Your Financial Institution Go? Webinar, Association of Certified Anti-Money Laundering Specialists (ACAMS)**
Co-presenter on regulatory and practical issues relating to outsourcing of AML compliance by banks and other financial institutions.
- February 2009** **The Essential US Laws, Rules and Regulations that AML Specialists Must Know, Association of Certified Anti-Money Laundering Specialists (ACAMS); Chicago, IL**
Sole lecturer at one-day seminar on compliance obligations under the Bank Secrecy Act and the USA PATRIOT Act.
- February 2009** **Everything you Ever Wanted to Know About Information-sharing Within the Egmont Group of Financial Intelligence Units, International AML Committee, American Bar Association; Washington, DC**
Moderated interview/podcast of Bill Baity, FinCEN Deputy Director, by Jill Mariani, Chief of the Money Laundering and Tax Crimes Unit, New York County District Attorney's Office.

- December 2008** **US Study Tour for the Central Bank of Russia on AML Supervisory Practices, Financial Services Volunteer Corps; Washington, DC**
Two-hour lecture on BSA/AML compliance issues and US financial crisis to group of 15 Russian central bankers.
- December 2008** **A Made-For-Advisers' Blueprint to Anti-Money Laundering Success Webinar, IA Week**
Speaker on panel discussing BSA/AML issues for investment advisers.
- October 2008** **3rd Annual Anti-Money Laundering and Counter-Terrorist Financing Forum, Institutional Investor Events & Compliance Reporter; New York City**
Moderator and speaker on AML outsourcing panel.
- October 2008** **Working with Your Financial Regulator: A Special Seminar for Compliance Professionals, Internal Auditors and Management Focus Training Solutions; Grand Cayman, Cayman Islands**
Spoke on regulatory compliance issues involving on-site examinations, including banking, securities and BSA/AML matters, at half-day seminar.
- September 2008** **Fight Fire with Fire: Everything You Need to Know about the Newest Threats from Trade-based and Technology-based Money Laundering, Association of Certified Anti-Money Laundering Specialists (ACAMS); New York City**
Moderator and speaker on trade-based money laundering panel.
- August 2008** **Anti-Money Laundering Trends & Career Opportunities Podcast interview, BankInfoSecurity.com**
Discussed BSA/AML trends, regulatory issues, trade-based money laundering and career opportunities in the field. For a transcript of the interview, please see <http://www.bankinfosecurity.com/interviews/anti-money-laundering-trends-career-opportunities-i-135> and <http://www.bankinfosecurity.com/anti-money-laundering-trends-career-opportunities-a-967>
- July 2008** **The Four Corners of an Effective AML Program for Community Banks Webinar, Lombard Risk International (USA)**
Covered BSA fundamentals for group of 50 compliance officers.
- May 2008** **Auditing the Anti-Money Laundering Compliance Function – A Training Course for Internal Auditors and Compliance Officers, Institute of Banking Studies; Kuwait City, Kuwait**
Sole lecturer for three-day training course in AML international standards, internal audit, transaction monitoring, and compliance practices.
- May 2008** **Certified Anti-Money Laundering Specialist (CAMS) Examination Preparation Seminar, Association of Certified Anti-Money Laundering Specialists (ACAMS); Kuwait City, Kuwait**
Sole lecturer for one-day seminar.
- April 2008** **Indonesia: Current Legal Reform, US – Indonesia Law Society & International Law Institute, Seminar at Millennium Challenge Corporation; Washington, DC**
Commentator on remarks by head of Indonesian financial intelligence unit regarding amendments to Indonesian AML law.

- April 2008** **World Conference on Combating Terrorist Financing Preparatory Colloquium on Terrorism Financing International Association of Penal Law & Case Western Reserve University School of Law; Cleveland, Ohio**
Panelist on trade-based money laundering and anti-terrorism issues. To view presentation, please go to <http://www.youtube.com/watch?v=SLR0rVylr-o&feature=channel> at 29:45.
- March 2008** **Achieving Examination Excellence with Best Practices that Regulators Cannot Criticize, Webinar, Money Laundering Alert**
Member of two-person panel on avoiding examination problems.
- March 2008** **US Law and International Standards on Financial Intelligence Units Seminar on Financial Integrity Law, Case Western Reserve University School of Law; Cleveland, Ohio**
Co-lecturer with Professor Richard Gordon.
- February 2008** **What Hedge Fund and Investment Advisor CCOs Should Know About AML Compliance, Teleconference for Jefferson Wells (financial services consulting subsidiary of Manpower, Inc.)**
- February 2008** **Alternative Career Options After Law School, The Criminal Law Society, George Washington University Law School; Washington, DC**
Member of three-person panel on non-traditional legal jobs.
- January 2008** **Best of Red Flags, Part 2: Specific Product Risks and Best Practices Webinar, Association of Certified Anti-Money Laundering Specialists**
Member of two-person panel on red flags raised by trade finance, mortgage lending, and correspondent banking.
- November & December 2007** **Independent AML Audit: Don't Leave Work Without It! How *not* to follow in the footsteps of American Express Webinar, Bekker Compliance Consulting Partners**
Member of two-person panel for two seminars on independent audit requirements; assisted in the planning, design, and marketing of seminar.
- November 2007** **2nd Annual Anti-Money Laundering and Counter-Terrorist Financing Forum, Institutional Investor Events; New York City**
Spoke and moderated three panels on AML compliance issues relating to politically exposed persons (PEPs), hedge funds and mutual funds.
- November 2007** **Caribbean Financial Action Task Force (CFATF) Plenary Meeting; San Jose, Costa Rica**
Presentation on major legal issues arising from AML/CFT assessment of Bermuda by International Monetary Fund.
- May 2007** **Eighth Biennial Regional Central Banks' Legal Seminar Cayman Islands Monetary Authority; Grand Cayman**
Spoke on US AML laws to audience of 35 lawyers, bankers, and financial regulators from nine Caribbean countries.

- May 2007** **What Every Compliance Officer Needs to Know About AML, but Didn't Want to Ask on a Friday Afternoon: Ever-Higher International Standards, Offshore Financial Center Assessments, and You, Cayman Islands Compliance Association; Grand Cayman**
Spoke to group of compliance officers on international AML standards.
- February 2007** **Adapting Your AML Program to Include Senior Management, the New Targets of Adverse Actions, Webinar, Money Laundering Alert**
Member of two-person panel on the role of senior management in AML compliance issues in 90-minute session for an audience in 80 locations.
- November 2006** **Workshop on AML Issues for Investment Advisers and Hedge Funds Anti-Money Laundering and Counter-Terrorist Financing for Financial Institutions Conference, Institutional Investor Events & Compliance Reporter; New York City**
Designed, organized, and served as workshop leader on proposed hedge fund regulations. Also moderated and spoke on independent audit panel.
- October 2006** **Seminar on Current Developments in Monetary and Financial Law: Law and Financial Stability, Legal Department, International Monetary Fund; Washington, DC**
Spoke on statutory protections for financial supervisors to group of 65 regulatory and central bank officials.
- October 2006** **Seminar on the FATF Mutual Assessment of the United States: The Continuing Evolution of International AML/CFT Standards Women in Housing and Finance; Washington, DC**
Organized session but was unable to attend seminar for personal reasons.
- October 2006** **Conducting Good Independent AML Program Audits to Identify Problems Before the Examiners Do, Webinar, Alert Global Media**
Member of two-person panel for 90-minute session for 250 participants.
- September 2006** **The Proposed AML Rules for Hedge Funds: A Great Leap Forward Into Deep Water? 16th Annual Anti-Money Laundering Audit and Compliance Forum, Institute for International Research; New York City**
Organized, moderated, and spoke on panel concerning proposed FinCEN regulations for hedge funds and investment advisers.
- September 2006** **Seminar on AML/CFT Assessments under the FATF Recommendations, Compliance Group, HSBC Bank USA; Washington, DC**
- August 2006** **What Insurers Need to Know to Comply with New AML Laws Teleconference, Institutional Investor Events**
Member of three-person panel on compliance issues for insurance companies.
- June 2006** **The 3rd Annual Mutual Fund Forum: Managing and Monitoring Operations to Ensure Compliance & Profitability, Institutional Investor Events; New York City**
Chaired two-day conference on compliance and governance issues.

- March 2006** **Hedge Funds Enter the World of Anti-Money Laundering Compliance Bloomberg World Headquarters; New York City**
Designed, organized, moderated, and spoke on proposed FinCEN AML regulations for hedge funds and investment advisers.
- February 2006** **Successful Career Transitions, Women in Housing and Finance; Washington, DC**
Spoke on panel regarding how to make a successful transition from more traditional positions in the finance sector to related careers.
- June 2005** **Workshop for Effective Enforcement of Criminal Justice Measures in Anti-Money Laundering and Combating the Financing of Terrorism IMF Legal Department in collaboration with the UNODC and the Prosecutor General's Office of Ukraine; Kiev, Ukraine**
Designed and organized seminar; course director, lecturer and moderator at three-day workshop for 70 Ukrainian judges and law enforcement officials.
- May 2005** **Legal Aspects of the International Monetary Fund's Role in AML/CFT Financial Institute of the Netherlands Antilles and Bank of the Netherlands Antilles (the Central Bank); Willemstad, Curacao**
Spoke at two seminars, the first to a group of 100 financial sector and government officials, and the second to a group of Central Bank officials.
- May 2005** **The New International Standards on AML/CFT: Are Changes Needed in Legal and Business Practices? University of Aruba; Oranjestad, Aruba**
Spoke to group of financial professionals, faculty, and students.
- May 2005** **Seventh Biennial Regional Central Banks' Legal Seminar Central Bank of Aruba; Oranjestad, Aruba**
Spoke on the impact of the new international standards on the legal profession to group of senior central bank lawyers from nine Caribbean countries. Also chaired discussions on financial regulation.
- January 2005** **Money Laundering Reporting Officers' Committee Law Society of England and Wales; London**
Spoke on legal issues involving the IMF's role in AML/CFT and international standards at a meeting of 35 Money Laundering Reporting Officers (MLROs) of City law firms and Law Society staff members.
- January 2005** **Seminar on Money Laundering, Law Society of England and Wales College of Law; London**
Spoke on international standards involving AML issues at three sessions for post-graduate legal practice students, one session of which was videotaped.
- December 2004** **Global Dialogue Series: New AML/CFT Standards – Caribbean Countries Videoconference, The World Bank; Washington, DC**
Spoke on FATF Special Recommendations, with an emphasis on SR. IX (cash couriers) at videoconference with officials from five countries in the region.

- December 2004** **Global Dialogue Series: New AML/CFT Standards – Central American Countries, Videoconference, The World Bank, Washington, DC**
Spoke on FATF Special Recommendations, with an emphasis on SR. IX (cash couriers) at videoconference with officials from six countries in the region.
- October 2004** **The Role of Lawyers in the Anti-Money Laundering Framework**
School of Law, University of Leeds; United Kingdom
Spoke on international AML standards as applied to the legal profession to a group of students, faculty, and lawyers.
- October 2004** **Corporate Governance of Financial Institutions**
The Institute of Advanced Legal Studies, University of London
Introductory speaker for conference and spoke on role of legal profession in AML compliance.
- October 2004** **Annual Conference for Overseas Regional Advisors, Office of Technical Assistance, US Treasury Department; Lisbon, Portugal**
Spoke on IMF technical assistance in AML/CFT to group of US legal, law enforcement, and banking advisors.
- August 2004** **Legislative Drafting Workshop for Countering the Financing of Terrorism and other Anti-Terrorism Measures, IMF Legal Department in collaboration with UNODC, Joint Vienna Institute; Vienna, Austria**
Designed and organized workshop; course director, lecturer, and moderator at five-day seminar for 30 officials from eight Eastern European countries.
- June 2004** **Strengthening the AML/CFT Regime for Afghanistan, Videoconference**
The World Bank; Washington, DC
Spoke on legislative issues at videoconference with officials from IMF, Afghan Central Bank, and commercial banks.
- June 2004** **Seminar on AML/CFT Standards, The National Bank of Belarus; Minsk, Belarus**
Spoke to a group of 35 commercial bank and government officials.
- May 2004** **Seminar on Current Developments in Monetary and Financial Law**
International Monetary Fund; Washington, DC
Spoke on bank insolvency issues; also moderated panels on bank insolvency, banking regulation, and AML issues relating to shell banks at biennial IMF seminar for 50 senior legal officials.
- April 2004** **Legislative Drafting Workshop on AML Measures: Responding to the Revised FATF 40 Recommendations, IMF Legal Department in collaboration with UNODC, Joint Vienna Institute; Vienna, Austria**
Designed and organized workshop; course director, lecturer and moderator at seminar for 30 participants from nine CIS and Eastern European countries.
- April 2004** **UN Commission on International Trade Law (UNCITRAL)**
Colloquium on Commercial Fraud; Vienna, Austria
Spoke on IMF activities in AML/CFT to group of 120 government and law enforcement officials and forensic specialists from 35 countries.

- March 2004** **Legislative Drafting Workshop for Combating the Financing of Terrorism and other Anti-Terrorism Measures, IMF Legal Department in collaboration with UNODC, Ministry of Foreign Affairs; Lima, Peru**
Lecturer and commentator at workshop for officials from the region.
- February 2004** **Anti-Money Laundering Efforts Around the World, Women in Housing and Finance; Washington, DC**
Spoke on IMF assessments to group of 20 financial professionals.
- January 2004** **Legislative Drafting Workshop on AML Measures: Responding to the Revised FATF 40 Recommendations, IMF Legal Department in collaboration with UNODC, Joint Vienna Institute; Vienna, Austria**
Designed and organized workshop; course director, lecturer and moderator at workshop for 30 officials from seven CIS and Middle Eastern countries. For press release, please see: www.imf.org/external/np/sec/pr/2004/pr0417.htm
- December 2003** **Distance Learning Program on Strengthening Anti-Money Laundering and Combating the Financing of Terrorism Regime, Videoconference, World Bank; Washington, DC**
Participated in videoconference with government officials from Kazakhstan, Kyrgyz Republic, the Russian Federation, Tajikistan, and Uzbekistan.
- December 2003** **Annual Conference for Overseas Regional Advisors, Office of Technical Assistance, US Treasury Department; Barcelona, Spain**
Spoke on IMF technical assistance in AML/CFT to group of 30 US legal, law enforcement, and banking advisors.
- August 2003** **Seminar on AML/CFT Standards, The National Bank of Belarus; Minsk**
Spoke to a group of 40 commercial bank and government officials.
- August 2003** **Legislative Drafting Workshop for Countering the Financing of Terrorism and other Anti-Terrorism Measures, IMF Legal Department in collaboration with UNODC Joint Vienna Institute; Vienna, Austria**
Designed and organized seminar; course director, lecturer, and moderator at workshop for 30 officials from seven CIS and Central Asian countries.
- June 2003** **Seminar on International Standards in AML/CFT, Central Bank of Sri Lanka; Colombo**
Spoke on FATF Recommendations to a group of government officials.
- June 2003** **The Insurance Supervision Leadership Program, The Toronto International Leadership Centre for Financial Sector Supervision; Annapolis, Maryland**
Spoke on FATF standards and International Association of Insurance Supervisors (IAIS) guidelines to a group of 36 insurance supervisors.
- May 2003** **Integrity Supervision: Widening of the Supervisory Net in the Caribbean Sixth Biennial Regional Central Banks' Legal Seminar Bank of the Netherlands Antilles; Willemstad, Curacao**
Spoke on integrity standards to a group of 36 officials from eight Caribbean countries; commentator for two other lecturers.

- February 2003** **Expert Working Group to Coordinate the Development of a Regional Framework Including Model Legislation to Address Terrorism Organized by the Pacific Islands Forum Secretariat; Suva, Fiji**
Spoke on AML/CFT assessment process and participated in development of model anti-terrorism legislation as member of expert working group.
- January 2003** **Legislative Drafting Seminar for AML/CFT, IMF Legal Department in collaboration with the Pacific Islands Forum Secretariat; Suva, Fiji**
Keynote speaker and lecturer on drafting issues relating to counter-terrorist financing to group of officials from 13 Pacific Island countries.
- November 2003** **Guernsey Association of Compliance Officers; Guernsey, The Channel Islands**
Spoke on AML issues, including OFC assessments.
- August 2002** **Legal Department, Wells Fargo Bank; San Francisco, California**
Spoke on AML issues at meeting and conference call for attorneys.
International Banking Subcommittee, Banking Law Committee, American Bar Association; Washington, DC
Spoke on AML issues at semi-annual meeting of banking lawyers.
- July 2002** **Financial Cluster, Latin American Region, The World Bank; Washington, DC**
Spoke on bank failure resolution at luncheon seminar, including issues related to central bank emergency liquidity financing and bank insolvency.
- July 2002** **Summer Associates Training Seminar, Fried Frank (law firm); Washington, DC**
Spoke on IMF policies relating to AML issues at law firm seminar.
- May 2002** **Seminar on Current Developments in Monetary and Financial Law International Monetary Fund; Washington, DC**
Spoke on central bank emergency liquidity financing issues, and moderated panels on AML and bank insolvency issues to group of 35 officials.
- April 2002** **International Task Force, Women in Housing and Finance; Washington, DC**
Spoke on issues relating to AML, FSAPs, and OFC assessments.
- March 2002** **Financial Transactions for Lawyers, Joint Vienna Institute Vienna, Austria**
Spoke on anti-money laundering and banking regulatory and insolvency issues to 30 officials from transitional countries.
- March 2002** **Solicitor General's Office, Department of Justice; Manila, Philippines**
Spoke on anti-money laundering issues at impromptu seminar for 12 lawyers from Philippines government office.
- March 2002** **Conference on Financial Sector Regulation for Pacific Island Countries Singapore Regional Training Institute; Singapore**
Spoke on AML/CFT Methodology, Offshore Financial Centers, and bank regulatory and insolvency issues to group of officials from 15 countries.

- March 2001** **Financial Transactions for Lawyers, Joint Vienna Institute; Vienna, Austria**
Spoke at three-day seminar on topics including offshore financial centers, AML laws, banking regulation, statutory protections for banking supervisors, and bank insolvency issues to a group of officials from 20 countries.
- November 2000** **Course in Law, Banking, and Finance, Office of Superintendent of Banking, Insurance, and Pensions; Lima, Peru**
Sole lecturer at five-day seminar on bank regulatory and insolvency issues as part of post-graduate course for 30 Peruvian government regulators.
- October 2000** **Central Banking and Banking Law Workshops, Legal Department International Monetary Fund; Washington, DC**
Spoke at two seminars for IMF Legal Department on central banking law issues and on banking law issues relating to Basel Core Principles.
- July 2000** **Developments in Monetary and Financial Law Legal Department, International Monetary Fund; Washington, DC**
Commentator and discussant on bank insolvency issues.
- June 2000** **Financial Transactions for Lawyers, Joint Vienna Institute; Vienna, Austria**
Spoke at two-day seminar on AML, banking regulation, bank insolvency issues, and trade finance to a group of officials from 20 countries.