

## ***JC Compliance & Audit***

*Premier Provider of Compliance and Audit Services*

### **Bank Secrecy Act, Anti-Money Laundering, OFAC, US Patriot Act and Regulation GG**

We can provide a full scope review departmental risk assessment as well as the ERM assessment to determine whether the Bank has included all pertinent areas of the bank's functions as they relate to the AML/CIP/OFAC and BSA programs. The areas tested will include high and medium risks as identified within the risk assessment. The review will also include an assessment of all business lines and products that could potentially expose the Bank to money laundering activities including a review and testing of activities related to Money Service Businesses.

In assessing the organization's governance, risk management, and control processes to ensure that the AML program includes the necessary elements, we will:

- Evaluate the adequacy of the AML risk assessment.
- Evaluate the adequacy of the BSA and related Policies and Procedures.
- Appointment of BSA Officer
- Board Reporting
- Examine the adequacy of customer due diligence policies, procedures, and processes to determine whether they comply with require
- Perform appropriate transaction testing, with particular emphasis on high-risk operations.
- Review of Correspondent Bank Activity and reporting
- Assess the adequacy of training.
- Review of compliance with OFAC reviews and testing
- Monetary Instruments and Reporting
- Wire Transfer Activity
- Retention of Records Policies and Procedures
- Review of Currency Transaction Reports
- Review Suspicious Activity/Transaction Reporting.
- Review of Monitoring and identifying Suspicious Activity
- Monitoring of exempt customers and filing
- Process for responding to Section 314(a) requests.
- Process for responding to Section 314 (b) requests.
- Customer Identification Program and testing
- Non-Profit Entities and Non-governmental entities
- Monitoring of High-Risk Customers
- Process and monitoring of Cash Intensive Customers.
- Training
- Sanctions
- Beneficiary Ownership Processes/Procedures

### **BSA Software/System Validation**

The validation includes a review the Bank's systems utilized in the BSA monitoring and reporting process to ensure the systems or model used complies with the expectations of SR 218 Interagency Statement on Model Risk Management for Bank Systems Supporting the Bank Secrecy Act/Anti-Money Laundering Compliance.

#### **Our review will consist of the following but not limited to:**

- Examine the integrity and accuracy of management information systems.
- Transaction Testing to validate the parameters established within the Bank's core and any automated review system to ensure the data is accurately transmitted.
- Review system access and parameters
- Ensure any established parameters for BSA monitoring are reasonable and working as intended.
- If manual system is used, validate the model to ensure the information has been captured as intended from the core system.
- Review any changes to the model and reasonableness as internal processes.
- Verify any outsourced system's independent audit reports/reviews to ensure that any issues are reviewed and addressed by management.

**Regulation GG (UIGEA):** Internet Gambling: Review of all regulatory requirements, policies/procedures, and assessments, monitoring and customer notices