

Records Found In Banks

Loughnane Associates LLC
Value Touches Everything



Learning Objectives:

TLO. Incorporate financial records and form into an investigation.

ELO 1 Explain the Customer Identification Program.

ELO 2 Describe a Risk-Based Approach.

ELO 3 Identify where bank records are maintained.

ELO 4 Describe Know Your Customer forms and information.

ELO 5 Describe Customer Due Diligence forms and information.

Reference List potential documents for subpoena or search warrant in a bank.



Beyond The Bank Statement

Think about the business processes that need or should exist for value transfer

Criminals:

- Financial crime uses financial systems in support of their operations
- Activities can easily extend beyond money laundering
- Activities occur throughout the networks

Business and Finance:

- May operate as a knowing or unknowing instrument
- Under laws in US and internationally, they are obligated to collect, retain, and report
- The processes and information collected for the money laundering process is also of great value to other types of financial crime investigations

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Building Evidence

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Foundation: The Customer Identification Program (CIP)

- A bank, including certain domestic subsidiaries, must have a written CIP
- Appropriate for its size and type of business and includes certain minimum requirements
- Must be incorporated into the bank's BSA/AML compliance program
- Must include **risk-based procedures** for verifying the identity of each customer

The documents we are going to discuss often support bank activity and reports and can be used to support a financial investigation analysis.

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Risk-Based Procedures

- Risk-based procedures
 1. Enable the bank to form a reasonable belief that it knows **the true identity** of each customer and
 2. Be based on the bank's assessment of relevant **risks**, including:
 - The types of accounts maintained by the bank
 - The types of services the bank should provide/offer
 - **Is business with the customer within the Acceptable Level of Risk?**
 - As a process, all this can vary based on the risk profile of a FI
 - International versus local banks
 - Bank size, location(s), and customer base
 - Size of compliance and/or investigations units

Bad guys often gravitate to smaller banks or FCUs as a result

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Know Your Customer (KYC)

- The process used to verify the identities of their customers and ascertain what risks they may pose
- In KYC, a significant amount of information is collected by financial institutions and businesses (varies by the type of business and CIP)
- Minimum requirements
 - Name, date of birth for an individual, address, and identification number (driver's license, passport, green card, etc.)
- Information can aggregate over time
 - Transaction monitoring system, bank interaction, and efforts to sell services

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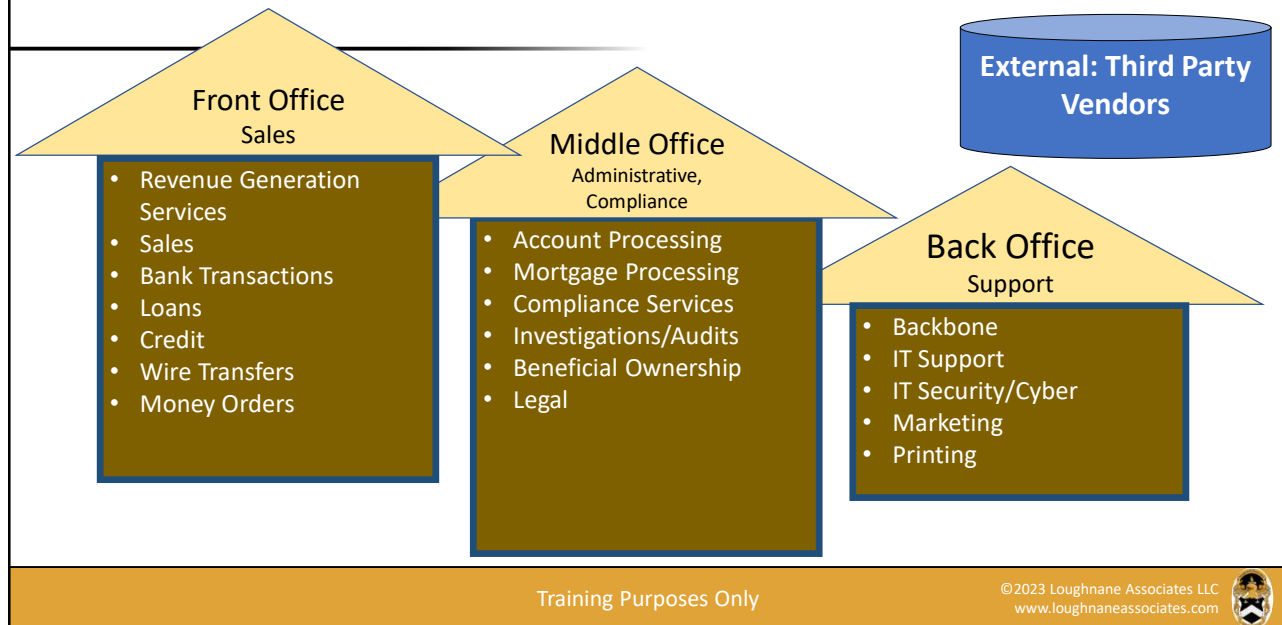
Where Can The Information In Banks Be found?

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Where Is The Information? Typical Bank Structure



Documents Of Interest

- KYC and Onboarding Forms
- Beneficial Ownership Forms
- PPP Loan Forms
- Documents associated with due diligence processes
- Transaction Monitoring System data
- Enhance Due Diligence and Politically Exposed Persons (High Risk Clients)
- Payment Order Forms
- Currency Transaction Reports
- Designation of Exempt Persons Forms
- IRS Form 8300
- Foreign Bank Activity Reports
- Safety Deposit Boxes

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KYC Forms

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Sample Know Your Customer Form

KNOW YOUR CUSTOMER (KYC) FORM
STRICTLY CONFIDENTIAL

S.No. Particulars	Details
1 Full Name of the Customer	_____
2 Legal Status	<input type="checkbox"/> Individual <input type="checkbox"/> Company <input type="checkbox"/> Partnership <input type="checkbox"/> Other: _____
3 Permanent Address	_____ _____ _____
4 Business/Trading Address	_____ _____ _____
5 ID No./CR No./Registration No.	_____
6 Purpose and Nature of Transaction to be undertaken	_____
7 In case of Individual	
(i) Nationality	_____
(ii) Occupation or Profession	_____
(iii) Name of Establishment or Employer	_____
(iv) Location of activity	_____
(v) Is the Individual a Politically Important Person (PEP)?	<input type="checkbox"/> YES <input type="checkbox"/> NO
8 In case of Others	
(i) City & Country of Incorporation	_____
9 Date of Birth / Incorporation	_____
10 What is the principal business/activity of the Customer?	_____

- Full Name
- Legal Status
 - Individual, Company, Partnership, Other
- Permanent Address
- Business/Trading Address
- Identifying Numbers
- If Individual
 - Nationality
 - Occupation
 - Name of Establishment or Employer
 - Location of Activity
 - Is the individual a PEP?

Consider the due diligence and follow up processes

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Banks ask about Beneficial Ownership

Name of the Group Entity _____ Group Entity Logo _____

11 Is the Customer acting on behalf of another Person? YES NO

If Yes:

(i) Name of Beneficial Owner _____

(ii) ID No./CR No./Registration No. _____

(iii) Domicile Country _____

(iv) If Beneficial Owner is an individual, then

a) Nationality _____

b) Is the individual a Politically Important Person (PEP)? YES NO

12 Regulatory Status Independent Regulator Non-Independent Regulator Unregulated

13 Name of Regulator (if any) _____

14 Name of Stock Exchange (if Listed) _____

15 If a Holding company, name of any other subsidiaries/branches/associated companies _____

16 If not, Group Company (if any) _____

If business activities are conducted in more than one country, please indicate names of all countries _____

18 Bank Details _____

19 Contact Details of Customer

(i) Contact Person _____

(ii) Tel & Fax _____

(iii) E-mail/website _____

(iv) Contact details of Compliance Officer (if any) _____

Questions that may be asked:

- Is the Customer acting on behalf of another person?
- Additional identifying information
- Beneficial Ownership information has been collected by banks well in advance of the Corporate Transparency Act

Consider the due diligence and follow up processes

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Individual, Company, Partnership, Trust

Name of the Group Entity _____ Group Entity Logo _____

20 Copies* of Customer Identification Documents
Please submit the documents and tick (✓) against the documents attached

(i) **Individual:** ID Card/Passport/Driving License(DL) Proof of Domicile Country**

(ii) **Company:** Company Registration (CR) List & Passport copies of Authorised Signatories List of Major Shareholders List & Proof of Domicile Country** of Directors
Major Shareholders:-Shareholders who, directly or indirectly, owns or controls more than5% of the shares or voting rights

(iii) **Partnership:** Certificate of Registration Partnership Deed List & Passport copies of Authorised Signatories List & Proof of Domicile Country** of Partners

(iv) **Trust:-** Certificate of Registration Trust Deed List & Passport copies of Settlor, Trustees, Protector List & Passport copies of Authorised Signatories List of Major Beneficiaries
Major Beneficiaries:-Beneficiary who is to receive atleast 25% of the funds of the Trust

(v) **Any other Legal Person:-** Registration Document List & Passport copies of Authorised Signatories List of the Individuals/Entities who ultimately owns, or exercises effective control over such person

Declaration

I/We hereby confirm that the above information provided to you is true and correct to the best of our knowledge. I/We acknowledge that if the information provided is found to be false or misleading then the business relationship may be terminated anytime at your discretion. I/We hereby agree to provide any additional information/documents that may be required.

Date: _____ Signature of Authorized Signatory _____

* Certified copies of documents clearly signed, stamped and dated by any of the following:
(1) A representative of an embassy, consulate or high commission of the country, or (2) A lawyer or attorney, or (3) A notary public or commissioner of oaths, or (4) A chartered or certified accountant.
The date of signatory should not be older than 3 months.
Copies of certified copies is not acceptable.
** Any document to show the residential address like utility bill, tenancy agreement etc.

20 Copies* of Customer Identification Documents *Please submit the documents and tick (✓) against the documents attached*

- (i) **Individual:-** ID Card/Passport/Driving License(DL) Proof of Domicile Country**
- (ii) **Company:-** Company Registration (CR) List & Passport copies of Authorised Signatories List of Major Shareholders List & Proof of Domicile Country** of Directors
Major Shareholders:-Shareholders who, directly or indirectly, owns or controls more than5% of the shares or voting rights
- (iii) **Partnership:-** Certificate of Registration Partnership Deed List & Passport copies of Authorised Signatories List & Proof of Domicile Country** of Partners
- (iv) **Trust:-** Certificate of Registration Trust Deed List & Passport copies of Settlor, Trustees, Protector List & Passport copies of Authorised Signatories List of Major Beneficiaries
Major Beneficiaries:-Beneficiary who is to receive atleast 25% of the funds of the Trust
- (v) **Any other Legal Person:-** Registration Document List & Passport copies of Authorised Signatories List of the Individuals/Entities who ultimately owns, or exercises effective control over such person

Consider the due diligence and follow up processes

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Business KYC Questionnaire for SBA PPP Loans

Business Name:

1. Is this a home-based business?

- Yes
- No

2. Purpose of account?

- SBA PPP Loan

3. What is the primary source of income for the business?

4. Does the business have other accounts with this institution?

- Yes
- No

5. How long has the business been in operation?

- Less than 1 Year
- Between 1 and 3 Years
- More than 3 Years

6. Number of Business locations

- 1
- 2 to 5
- More than 5

Where there any follow up questions?

7. Does the business have a website? Please list.

8. What industry is your business in (manufacturing, car sales, convenience store, etc.)?

9. What products and services does the business provide?

10. Is the business a charitable organization or non-profit?

- No
- Yes

11. Does the business own or operate ATM machines?

- No
- Yes*

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Business KYC Questionnaire for SBA PPP Loans

12. Does the business cash checks for its customers?

- No
- Yes*

13. Will the business sell or redeem money orders, gift cards, reloadable cards, or travelers' checks for its customers?

- No
- Yes*

14. Does the business send or receive money for its customers? (ex. Western Union)

- No
- Yes*

15. Has the beneficial ownership and controller certification form been completed?

- No*
- Yes

What are some of the follow-on questions?

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Customer Due Diligence Forms

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Customer Due Diligence Process

Full identification of customer and business entities including source of funds and wealth when appropriate

Development of transaction and activity profiles of each customer's anticipated activity

Definition and acceptance of the customer in the context of specific products and services

Assessment and grading of risks that the customer or the account present

Account and transaction monitoring based on the risk presented

Investigation and examination of unusual customer or account activity

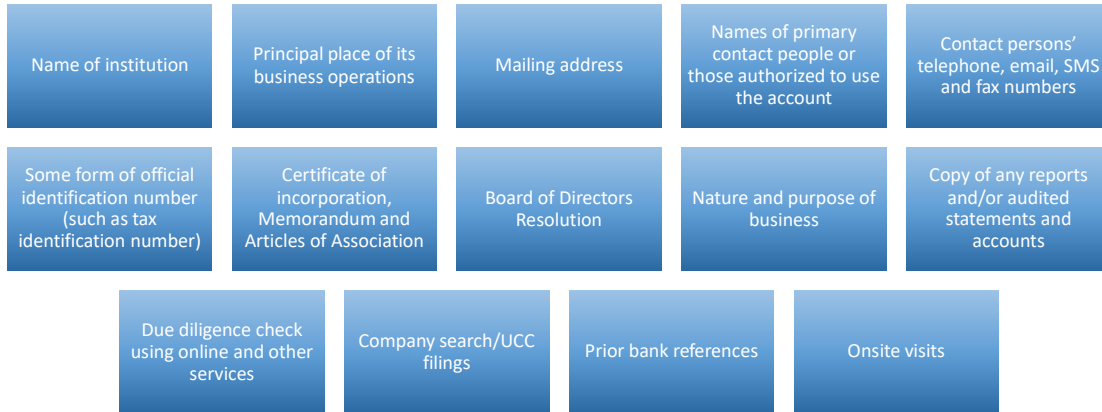
Documentation of findings

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Customer Due Diligence on Information for Corporations

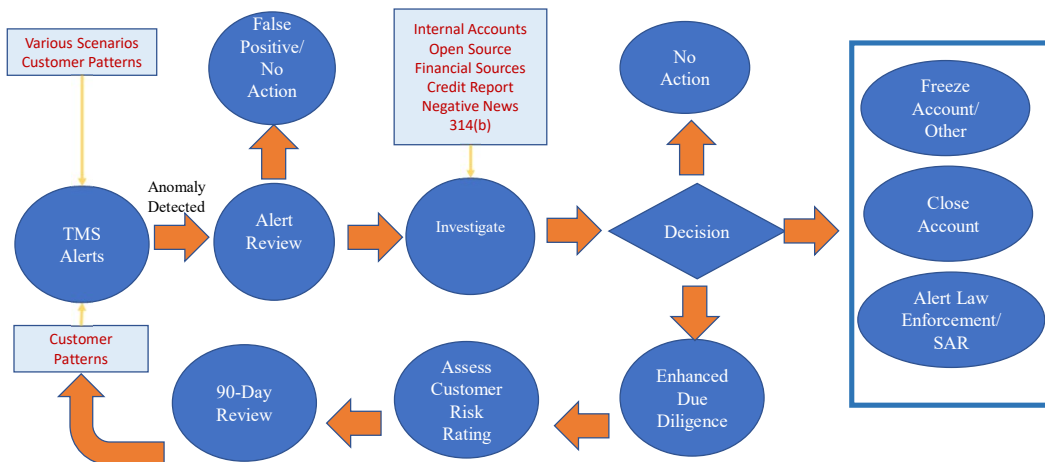


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Transaction Monitoring Systems



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High Risk Clients: Politically Exposed Person (PEP)

- The term is commonly used to refer to foreign individuals who:
 - Entrusted with a prominent public function
 - Immediate family members
 - Close associates
- PEPs can present a higher risk that their funds may be the proceeds of corruption or other illicit activity
- US does not consider US public officials as “politically exposed persons”
- The assessment of risk associated with PEPs, however, varies and not all PEPs are automatically higher risk (but the bank should likely need to articulate)
- “Senior Foreign Political Figures” (SFPF), as defined under the BSA private banking regulation, are a subset of PEPs

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What PEP Data Is Collected In A Bank?

- Employment
- Sources of income
- Information direct from the PEP
- Reference checks
- Research prepared on the PEP
- Transaction monitoring
- Beneficial Ownership Relationships
 - Deposit Brokers (signed contracts)
 - Offshore Customers
 - Foreign Shell Banks



- FedWIRE
- ACH
- SWIFT

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High Risk Clients: Enhanced Due Diligence Form

ENHANCED CUSTOMER DUE DILIGENCE QUESTIONNAIRE

Form ID: ENDD-2021-001

Name of Customer (NM) _____ (P) _____

Identification Number (NM) / Passport (NM) _____ (P) _____

PART A - CUSTOMER BACKGROUND CHECK
Please answer **all** the following questions.

1. Location:
 (1) Incorporated in the following country / jurisdiction: _____
 (2) Has registered address in the following country / jurisdiction: _____
 (3) Has a trading address in the following country / jurisdiction: _____
 (4) Has a place of business in the following country / jurisdiction: _____

2. Occupation / Nature of Business:
 (1) Has you or the Customer been involved in the following activities (Please list them and your role) in the last 12 months? (If 'Yes', please specify the type of business and its size)
 (2) If 'Yes', please specify the type of business and its size: _____
 (3) If 'No', please specify the type of business and its size: _____

3. Politically Exposed Persons (PEPs):
 (1) Are you or the Customer a PEP (Family member of a PEP)?
 (2) If 'Yes', please specify the name of the PEP: _____
 (3) If 'No', please specify the name of the PEP: _____

4. Sanctions:
 (1) Are you or the Customer subject to any international sanctions?
 (2) If 'Yes', please specify the name of the sanctioning authority: _____
 (3) If 'No', please specify the name of the sanctioning authority: _____

5. Other Information:
 (1) Please provide any other information that may be relevant to your assessment of the Customer's risk profile: _____
 (2) Please provide any other information that may be relevant to your assessment of the Customer's risk profile: _____

- Identification information
- Where do you do business?
- What is your occupation/nature of business?
- Are you a PEP?

Consider the due diligence and follow up processes
What would you ask?

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Enhanced Due Diligence

PART B - SOURCE OF FUNDS AND SOURCE OF WEALTH

1. Please indicate your source of funds (please tick all that apply):
 (1) Salary from employment (NM) / Salary from employment (P) _____
 (2) Business profits (NM) / Business profits (P) _____
 (3) Dividend income (NM) / Dividend income (P) _____
 (4) Interest income (NM) / Interest income (P) _____
 (5) Rental income (NM) / Rental income (P) _____
 (6) Inheritance (NM) / Inheritance (P) _____
 (7) Gift (NM) / Gift (P) _____
 (8) Other (NM) / Other (P) _____

2. Please indicate your source of wealth (please tick all that apply):
 (1) Business profits (NM) / Business profits (P) _____
 (2) Dividend income (NM) / Dividend income (P) _____
 (3) Interest income (NM) / Interest income (P) _____
 (4) Rental income (NM) / Rental income (P) _____
 (5) Inheritance (NM) / Inheritance (P) _____
 (6) Gift (NM) / Gift (P) _____
 (7) Other (NM) / Other (P) _____

3. Please describe the nature of the business and its operation:
 (1) Please describe the nature of the business and its operation: _____
 (2) Please describe the nature of the business and its operation: _____

4. Please indicate the source of the person who inherited the wealth (what is the relationship between the two of you)?
 (1) Please indicate the source of the person who inherited the wealth (what is the relationship between the two of you)? _____
 (2) Please indicate the source of the person who inherited the wealth (what is the relationship between the two of you)? _____

5. Please indicate the source of the person who inherited the wealth (what is the relationship between the two of you)?
 (1) Please indicate the source of the person who inherited the wealth (what is the relationship between the two of you)? _____
 (2) Please indicate the source of the person who inherited the wealth (what is the relationship between the two of you)? _____

- Specific Source of Wealth Questions
 - For Business Relations
 - For Personal Wealth
- Source of Inheritance
- Is Source Real Estate?
- Is Source from Salary?

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Enhanced Due Diligence

What is your profession, including area of specialty?
 (PEP)

 How many years have you been in this line of work? How many years have you been with your employer?
 (PEP)

 A. **Employer(s)**
 Please provide the name of your previous employer which contributed to the greatest share of your savings.
 (PEP)

 In which industry does the above-mentioned company belong to? What was your position held there?
 (PEP)

 How many years were you with the above-mentioned company?
 (PEP)

 B. **Investment Activity**
 How have investments been held?
 (PEP)

 Are there investment earnings resulting from regular income? (e.g. fixed coupon payments / bond dividends)
 (PEP)

TABLE C – GOVERNMENTAL SOURCE OF FUNDS
 Please indicate the names of your i) organization / employer and ii) your occupation / position. If you are not the PEP, please indicate the name of their immediate family member(s) or close associate (s) who is/ is the name of his/her/their organization / employer and iii) their occupation / position.
 (PEP)

 2. Is there any expected receipt of large sums of monies from governmental bodies or state-owned entities? If yes, from who / where?
 (PEP)

UNFINISHED CUSTOMER DUE DILIGENCE QUESTIONNAIRE (20200721) Page 4 of 5

- Savings
- Investments
- “Please indicate the name of your i) organization / employer and ii) your occupation / position. If you are not the PEP, please indicate i) the name of that immediate family member(s) or close associate (s) who is, ii) the name of his/her/their organization / employer and iii) their occupation / position. ”
- Is there any expected receipt of large sums of monies from governmental bodies or state-owned entities? If yes, from who / where?
- Will there be any usage of government account(s) as a source of funds in a transaction?

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High Risk Clients: Enhanced Due Diligence

A. Will there be any usage of government account(s) as a source of funds in a transaction?
 (PEP)

TABLE D – TRANSACTION INFORMATION
 Please indicate your expected amount for each transaction (please tick one):
 Less than 10,000 10,000 – 50,000
 50,001 – 100,000 Above 100,000
 Please let us know if you have any other additional information that is relevant, but not covered above.

TABLE E – DISCLOSURES
 UNFINISHED CUSTOMER DUE DILIGENCE QUESTIONNAIRE (20200721) Page 4 of 5

- Please indicate your expected amount for each transaction (please tick one):
 - Less than 10,000 10,000 – 50,000
 - 50,001 – 100,000 Above 100,000
- Please let us know if you have any other additional information that is relevant, but not covered above.

What are the source documents?
 Where does this lead?
 Who asks similar information

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High Risk Clients: Enhanced Due Diligence

Pre-Officer Use Only
 To be completed by a member of the Compliance Team

Account Opening Date (DD/MM/YYYY) _____

1. Is there any finding from internal screening? If yes, what are the findings?

2. Any concerns in the Company established or continue business relationship with the customer?

3. Describe the source of fund and source of wealth of the customer. Are there inconsistencies between all available information and the source of fund and source of wealth?

4. Based on information from Part C or internal screening results, is the account holder (joint account holder) considered a PEP?

Should the business relationship be established or continued? (YES / NO)

Should the account be set to high-risk? (YES / NO)

Reasons for setting the account to high risk:

Politically Exposed Person High-risk jurisdiction

Single-use equipment / nature of business

Suspicious Transaction or Other Material? Please elaborate further below

Reviewed By	Name	Signature	Date
COMPLIANCE			

Comments by Senior Management:

Approved By	Name	Signature	Date
SENIOR MANAGEMENT			

ENHANCED CUSTOMER DUE DILIGENCE QUESTIONNAIRE (20200727) Page 5 of 5

- Internal Screening Process Results
- Any concerns if we move forward?
- Did you find any inconsistencies?
- Should we consider as a PEP?
- Do we set up a relationship?
- Is this a high-risk customer?

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Safety Deposit Boxes



- For individuals, only the person(s) on the Bank's records as lessee(s) and an Attorney-in-Fact or Deputy duly authorized by such individual shall have access to the Box.
 - Usually, a service only for bank customers
 - But is considered a Lessor and Lessee relationship
 - Rental fee is paid up front
 - Safe Deposit Box Signature Card
 - Record of Access Cards or Agreement
- Contents not insured by bank
- Certain items (like firearms) usually not allowed
- Forms are filed for abandoned boxes
- Rental Form with access information
- Look for box surrender information
- Consider possible box inventory form
 - Inheritance or abandonment

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Do Not Get From Bank: Suspicious Activity Report

FD-109 Suspicious Activity Report by Money Services Business
 Form No. 10/2017
 Prerequisite: Submit with an FD-302, FD-302a, FD-302b, FD-302c, FD-302d, FD-302e, FD-302f, FD-302g, FD-302h, FD-302i, FD-302j, FD-302k, FD-302l, FD-302m, FD-302n, FD-302o, FD-302p, FD-302q, FD-302r, FD-302s, FD-302t, FD-302u, FD-302v, FD-302w, FD-302x, FD-302y, FD-302z, FD-302aa, FD-302ab, FD-302ac, FD-302ad, FD-302ae, FD-302af, FD-302ag, FD-302ah, FD-302ai, FD-302aj, FD-302ak, FD-302al, FD-302am, FD-302an, FD-302ao, FD-302ap, FD-302aq, FD-302ar, FD-302as, FD-302at, FD-302au, FD-302av, FD-302aw, FD-302ax, FD-302ay, FD-302az, FD-302ba, FD-302bb, FD-302bc, FD-302bd, FD-302be, FD-302bf, FD-302bg, FD-302bh, FD-302bi, FD-302bj, FD-302bk, FD-302bl, FD-302bm, FD-302bn, FD-302bo, FD-302bp, FD-302bq, FD-302br, FD-302bs, FD-302bt, FD-302bu, FD-302bv, FD-302bw, FD-302bx, FD-302by, FD-302bz, FD-302ca, FD-302cb, FD-302cc, FD-302cd, FD-302ce, FD-302cf, FD-302cg, FD-302ch, FD-302ci, FD-302cj, FD-302ck, FD-302cl, FD-302cm, FD-302cn, FD-302co, FD-302cp, FD-302cq, FD-302cr, FD-302cs, FD-302ct, 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FD-302zw, FD-302zx, FD-302zy, FD-302zz

Part II Suspicious Activity Information, Continued
 19. Currency exchanged: Total Currency exchanged: _____ Currency: _____ Amount (USD Dollars): _____
 20. Bank credit currency: _____
 21. Bank debit currency: _____
 22. Type of business location (check only one): Banking location Paying location Both
 23. Length of time at address: _____
 24. Reporting Business as: Sole proprietorship Partnership Limited liability company (LLC) S corporation C corporation Other (specify): _____
 25. Reporting Business as: Sole proprietorship Partnership Limited liability company (LLC) S corporation C corporation Other (specify): _____
 26. Reporting Business as: Sole proprietorship Partnership Limited liability company (LLC) S corporation C corporation Other (specify): _____
 27. Reporting Business as: Sole proprietorship Partnership Limited liability company (LLC) S corporation C corporation Other (specify): _____

Do not ask for this form. Obtain from LE receivers

Correspondent Banking

Respondent Bank - Correspondent Bank And Payable Through Accounts (PTA)

Account Holder



CORRESPONDENT BANK



1. Access/Approval Requested
2. Pre-approves transaction
3. Little Bank adjusts account holder's account & its account at Big Bank

RESPONDENT BANK



1. Direct Access

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Travel Rule

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Travel Rule

All financial institutions are required to pass on certain information to the next financial institution, for transactions \$3,000 and up, in certain funds transmittals involving more than one financial institution.

Transmitter Side

- ✓ Name, address
- ✓ Account number if used
- ✓ Identity of financial institution
- ✓ Amount transmitted
- ✓ Execution date
- ✓ Identity of recipient's Financial Institution

Recipient Side

- ✓ Name, address
- ✓ Account number
- ✓ Any other specific identifier

Intermediary Bank

- ✓ Required to pass on all the information from Transmitter Bank or a proceeding Intermediary

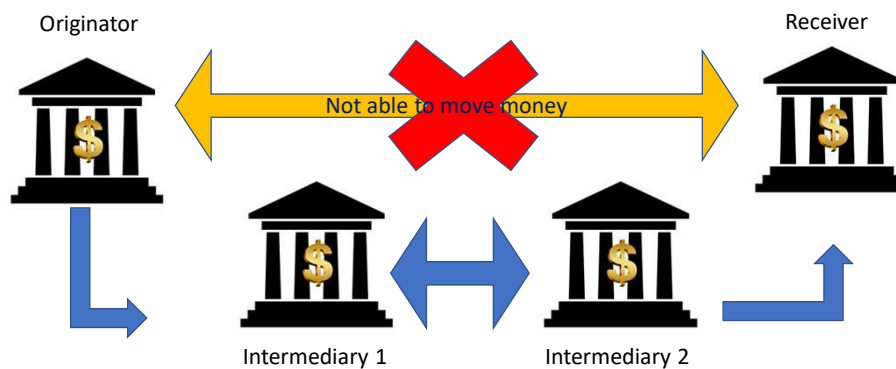
Exception - If Transmitter and Recipient are the same Financial Institution

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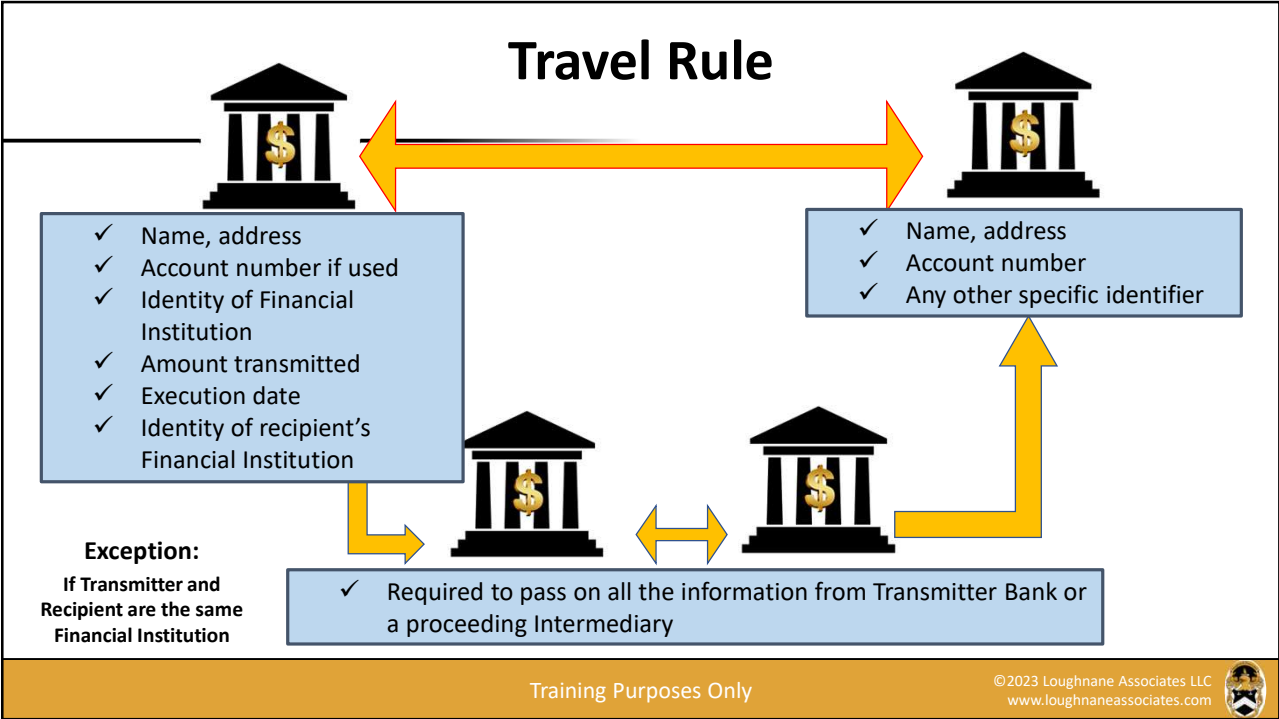
Travel Rule



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Private Banking And Wealth Management

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Private Banks

Wealth management
Account/Assets at least \$1,000,000
Assigned to a bank employee
non-US Person (PATRIOT Act, S312)
One-on-one confidential service
High Net Worth Individuals
Politically Exposed Persons
Oligarchs/Kleptocrats

WEALTH

Wolfsberg Group
Concerns (2001)

1. Reputation
2. Legal
3. Operation
4. Concentration

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Reference: Records To Consider For Subpoena Or Search Warrant

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Bank Records Used to Support Investigations

- §D Obtain information about entity's Customer Identification Program
 - Hold them to their own policies and programs
- §D Information and supporting documents collected or generated used to identify individuals, businesses, and Beneficial Owners
 - Ex. Driver's License or Organization Documents
- §D Any Customer Due Diligence account opening questionnaires performed on the customer and/or accounts
 - Any internal assessments, notes, reports or consideration of this information
- §D Beneficial Ownership Information Certification Forms(s)
 - Including recertification forms or documentation for each accounts

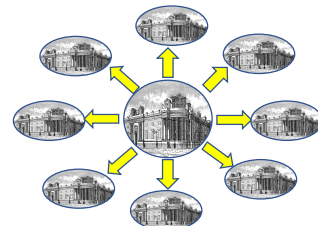
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Bank Records Used To Support Investigations

- §D Electronic data extract file of all customer(s) transaction activity for an identified time period
 - Directly from the Bank's core system or the TMS
 - Other files located outside of the Bank's core system
- §D Account Number, Account Type, Transaction Description, Transaction Type
 - Internal account transfers
 - All Automated Clearing House activity
 - Wire Transfer data
 - Foreign Exchange activity
 - Cashed Checks



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Bank Records Used To Support Investigations

- ☒ Enhanced Due Diligence/High Risk Customer reviews
 - For each customer and/or account
- ☒ Any alerts generated through the bank's transaction monitoring processes that included accounts or transactions pertaining to the named parties, regardless of if the alert resulted in a regulator filing
 - For any alerts and/or cases, provide the parameters that were triggered
- ☒ Copies of Cash Transaction Reports
- ☒ Copies of Monetary Instrument Reports

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Bank Records Used To Support Investigations

- ☒ Obtain any case reviews or similar analysis such as internal investigations performed, including supporting documentation about the customer derived from the financial institution's suspicious activity monitoring or fraud software
- ☒ **Do not include any copies of actual SAR filings**
- ☒ However, ensure (as applicable) that any supporting document that may have been a part of a SAR filing decision is included



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Bank Records Used To Support Investigations

Records that reflect activity:

- § D Wires originated online and within the branch
- § D Cash activity, including deposits and withdrawals
- § D Cash advances
- § D Credit memos
- § D Currency exchanges (foreign and domestic)
- § D Cashed third-party and cashed-on-us checks



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Bank Records Used To Support Investigations

Records that reflect activity:

- § D Foreign, domestic and foreign exchange (FX) wires
- § D Monetary Instrument purchases or encashments performed by or on behalf of the customer
- § D Checks negotiated against the customer's account and all check deposits
- § D Account transfers including the receiving and sending account numbers
- § D P2P (Payment to Payment) details (mobile app related transfers)
- § D ACH debits and credits, including international ACH transactions
- § D Foreign ATM withdrawal information



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Bank Records Used To Support Investigations



Transaction Dates



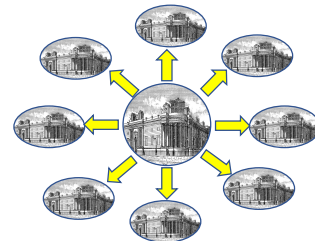
Credit/Debit Activity

- Include any ATM, night drop, or bulk cash activities



Safe Deposit Box information

- Account Name
- Box Number
- Location of Box
- Copies of Access Records



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Business Records Banks May Hold

Business Sources

Corporation Records
Taxes and Accounting Records
Bank Accounts Onboarding
Continuous Monitoring Data
Beneficial Ownership

Value Movement

Bank Information
FedWIRE
Automated Clearing House
SWIFT Messaging
Use of Alternate Remittance
Use of Middlemen

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Business Records Related to:

Forensic Accounting

Business Operation Records
Tax Preparer Workpapers
CPA Audit Workpapers
Insurance Due Diligence
Real Estate Purchases in Cash
(Large Cash Purchases, Generally)
Loan Due Diligence
Mutual Agreements
Treaties

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Questions?

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Value Touches Everything



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