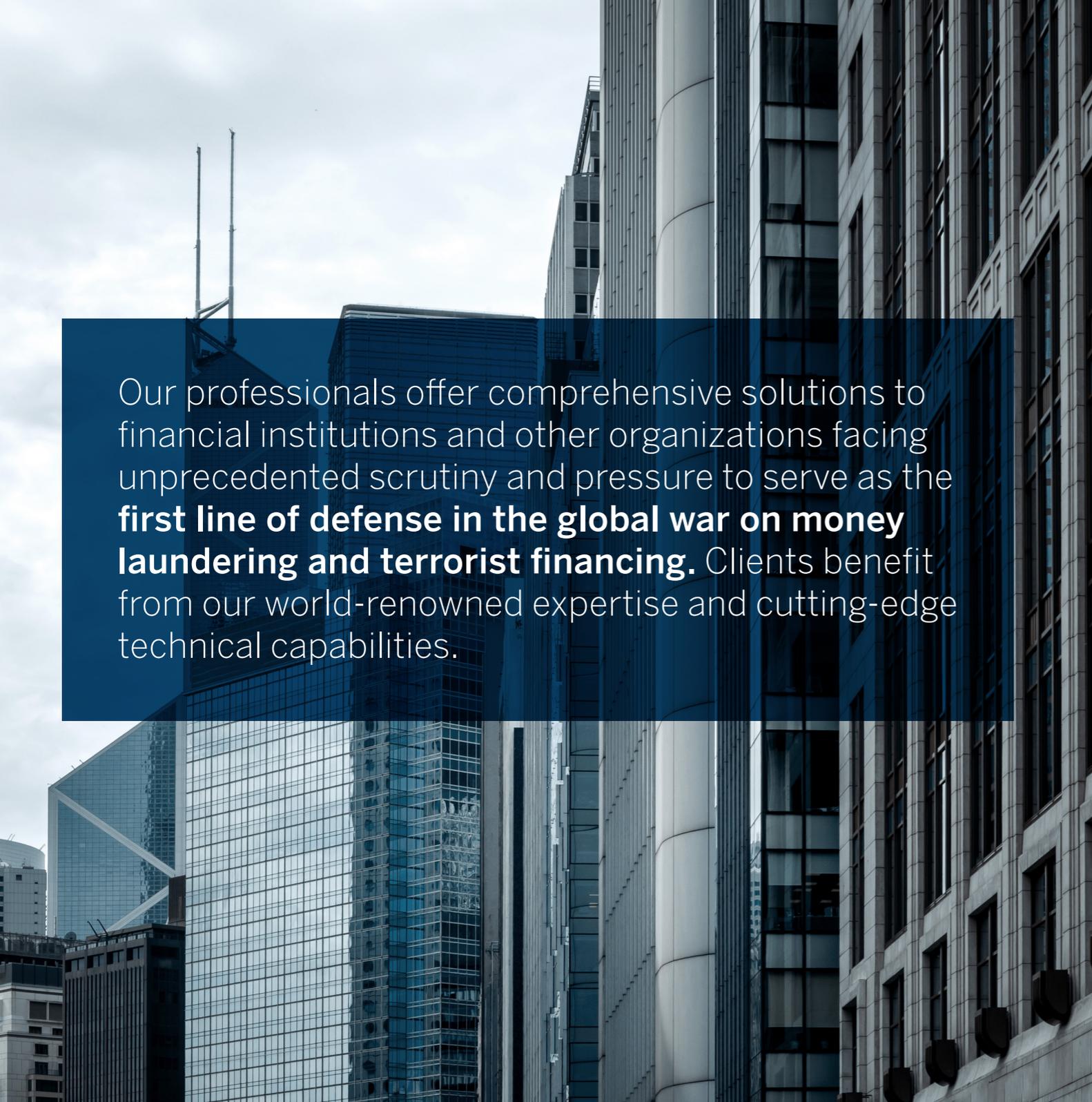




# ANTI-MONEY LAUNDERING, SANCTIONS & ANTI- CORRUPTION SOLUTIONS

EXPERTS WITH IMPACT



Our professionals offer comprehensive solutions to financial institutions and other organizations facing unprecedented scrutiny and pressure to serve as the **first line of defense in the global war on money laundering and terrorist financing.** Clients benefit from our world-renowned expertise and cutting-edge technical capabilities.

# About Anti-Money Laundering, Sanctions & Anti-Corruption Solutions

FTI Consulting is well positioned to assist you with all aspects of your organization's compliance, risk management and investigations efforts. We offer end-to-end anti-money laundering, sanctions and anti-corruption consulting services. Our professionals have a history of success on matters ranging from complex global investigations to discreet remediation tasks. We regularly consult to institutions both large and small as an independent and trusted advisor.

## THE FTI CONSULTING ADVANTAGE

We approach client challenges with diligence, ingenuity and purpose. Our diverse background offers clients solutions of unmatched breadth and depth.

- Distinguished technical and subject matter experts
- Top rated data warehouses and analytical computing power
- In house licensed private investigators
- Customized technology applications and platforms
- Global presence and local language capabilities
- Industry recognized software services

# Anti-Money Laundering, Sanctions & Anti-Corruption Service Offerings



Lookback Transaction Reviews



Investigative Due Diligence & Business Intelligence



Transaction Monitoring & Sanctions Screening Design, Analytics & Validation



Cybersecurity & Computer Forensics



Compliance Program Development, Assessment & Remediation



Expert Witness Services



Enforcement Advisory

## Services to our Clients

Banks • Broker-Dealers • Money Transmitters • Regulators  
Insurers • Law Firms • Investors • Corporations



### LOOKBACK TRANSACTION REVIEWS

Our capabilities span the entirety of a lookback, from the initial identification and extraction of data, to the analysis and reporting of key findings. We have been engaged in proactive internal reviews as well as forensic reviews prompted by government authorities.

#### KEY SERVICES

- Data mapping, extraction, validation, analysis and hosting
- Payment message linking and deduplication
- Filter and detection scenario design and execution
- Design and implementation of review protocols
- Comprehensive record review
- Global investigative research of high-risk parties
- Thorough and objective reporting of findings

### CASE STUDY

#### *Lookback for Global Payments Network*

FTI Consulting was engaged by a **global banking group** to undertake a forensic review of transactions processed by the bank's main U.S. branch, with the objective of identifying and reporting high-risk transaction activity in relation to BSA/AML and OFAC laws and regulations. **FTI Consulting mapped and extracted the relevant data necessary to conduct the review, comprised of over 50 million transaction records stored across four continents**, then carefully filtered and identified the records relevant to the review. The resulting records were uploaded to a secure host, accessible through **FTI Consulting's customized review application**.

Our team carried out a **comprehensive review of the transactions** based on protocols, filters, and detection scenarios designed by our experts and supported by our researchers around the world. We drafted a thorough and objective report of findings that was ultimately utilized by the bank for a variety of **risk management and legal compliance purposes**.

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## TRANSACTION MONITORING & SANCTIONS SCREENING DESIGN, ANALYTICS & VALIDATION

FTI Consulting's technology and large-scale data analysis expertise complements our investigative and compliance expertise to help entities develop effective compliance, detection, and risk management programs. FTI's comprehensive approach to transaction monitoring leverages a suite of sophisticated tools including extensive rule libraries, statistical analyses packages, and sophisticated scoring and weighting algorithms.

### KEY SERVICES

- NYSDFS Part 504 "Transaction Monitoring Compliance and Certification" support
- Transaction screening and surveillance system testing
- Systems integration and validation
- Algorithm tuning, calibration, and validation
- Rules-based analyses
- Advanced statistical analyses
- Scoring and weighting methodologies
- Interactive data visualization

## 🔍 CASE STUDY

### *Complete Systems Review*

FTI Consulting conducted **systems tests of the data feeds from a bank's core transaction and payment system to its compliance surveillance system**. This included an analysis of numerous transaction attributes and a validation that all necessary information from the core system was successfully passed to the surveillance system according the required parameters **without interference or interruption**.

FTI Consulting was also tasked to **analyze the bank's data-mapping logic** and the implementation of that logic in order to verify the integrity of the segmentation, filtering, and transformation of the data. We reviewed the logic underlying the bank's customer and transaction categorization protocols, tested and analyzed the performance of that logic, and recommended changes in instances where aberrant logic or data output was identified.



## COMPLIANCE PROGRAM DEVELOPMENT, ASSESSMENT & REMEDIATION

FTI Consulting develops and assesses comprehensive compliance programs, including key components such as compliance structure, policies and procedures, risk assessments, control effectiveness, training and governance. We help ensure that the compliance programs of our clients account for the risk factors relevant to their specific institutions and establish sound policies and procedures, effective controls and a strong governance structure. We also assist institutions with remediation efforts needed to bring a current program into compliance with regulatory requirements.

### KEY SERVICES

- Develop new and assess existing compliance programs
- Implementation of KYC procedures
- Governance training and expert support
- Regulatory gap analysis and consulting
- Evaluation of transaction monitoring rules and algorithms
- Bespoke compliance training
- Sample testing of KYC files, alerts, investigations and SAR filings
- Global investigative research and due diligence

## 🔍 CASE STUDY

### *Independent Compliance Program Evaluation*

FTI Consulting was engaged as an **independent consultant** to an **international bank**. Our work included evaluation of the adequacy and effectiveness of the compliance program and internal controls; the organizational structure, management oversight and reporting lines; review and testing of past transactions and investigation of possible violations of laws or regulations. **The work involved a review of the evolution of the program over a five year period, as well as an assessment of the likelihood of future compliance** based on the compliance program's strength and flexibility, the institution's projected growth, and the **changing regulatory environment**.

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## ENFORCEMENT ADVISORY

FTI Consulting leverages our team of former bank regulators, law enforcement personnel, and industry professionals to support clients that have come under regulatory or law enforcement scrutiny. Our professionals regularly appear before regulatory and law enforcement bodies on important matters such as enforcement activity, rulemaking, and industry trends. Many of our professionals have been qualified as AML experts by state and federal courts. By ensuring that governance, control, and risk management structures are firmly in place and operating effectively, we help our clients meet the challenges of complying with ever-evolving regulations and avoid regulatory, law enforcement, and reputational “hot buttons.”

We assist clients by performing independent compliance and forensic transaction reviews and offer support in examinations and enforcement investigations.

### KEY SERVICES

- Independent forensic transaction reviews (lookbacks)
- Independent program assessments
- Supervisory examination support
- Enforcement inquiry and incident response
- Data extraction, management, and hosting

## 🔍 CASE STUDY

### *Regulatory Finding Requiring Immediate Attention*

FTI Consulting was retained by a global banking group to **support remediation efforts** stemming from an enforcement action and **exam results** identifying a number of matters which required immediate attention. FTI Consulting supported a large-scale transaction review including collection and analysis of transactional data; **assessment of critical controls and systems functions; and, advised the bank on communicating with regulatory agencies** in delivering its findings relating to its mitigation and remediation efforts.



## INVESTIGATIVE DUE DILIGENCE & BUSINESS INTELLIGENCE

FTI Investigations, our in-house private investigations agency, has unmatched expertise in the search, synthesis and analysis of information from public and non-public sources. We act quickly and discreetly to provide our clients with the essential information necessary to make key decisions concerning their counterparties, clients, vendors and other associates. In some cases, our clients turn to us to conduct due diligence on their own firms as an assurance measure for sought-after correspondent relationships.

### KEY SERVICES

- Investigative research of vendors, counterparties, and high-risk transactions
- Discreet source inquiries in jurisdictions with limited public records
- Key client, account, correspondent and counterparty due diligence
- Self-due diligence to facilitate correspondent relationships
- Compliance staff training on investigative research and KYC best practices

## 🔍 CASE STUDY

### *Investigation into Shell Company Activity*

**FTI Consulting was engaged to provide expert witness testimony in an alleged pump-and-dump scheme.** We undertook **investigative research** into many corporations in **known shell jurisdictions and offshore banking locations** to gather information on the true nature of the entities and business activities. FTI Consulting opined on the typical uses, characteristics and hallmarks of offshore shell companies including, the structure of a shell company and the role of nominee shareholders and beneficial owners in shell corporations.

We also analyzed formation documentation, KYC and due diligence documentation, bank statements, trading activity and email communication to **determine to what extent each offshore entity acted in a way consistent with the hallmarks of an offshore shell company** designed to promote anonymity of the beneficial owners and conduct illicit activity.

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## CYBERSECURITY & COMPUTER FORENSICS

FTI Consulting helps organizations better govern, secure, locate, and rapidly make sense of digital information amid a surge in the volume and importance of enterprise data. Our cybersecurity structure and capabilities are engineered to synthesize cutting edge intelligence-led cybersecurity practices around a trusted core of comprehensive offerings, enabling clients of any size to address their most critical needs and integrate new solutions atop or alongside any preexisting policies and programs.

### KEY SERVICES

- Implement and execute Information Governance and Cybersecurity policies
- Cyber investigations and incident response
- Threat hunting operations and deceptive defense techniques
- Data identification, collection and preservation from all electronic media
- Cyber planning, audit, risk assessment, architecture design and penetration testing
- Data deduplication and e-discovery processing
- Secure document hosting onsite, domestically and internationally
- Foreign-language review

## 🔍 CASE STUDY

### *Commodities and Futures Broker Fraud Investigation*

FTI Consulting responded to an **audit committee's emergency request to investigate potential fraud** that implicated a major public corporation, a New York-based financial services company with a market capitalization of \$3.5 billion. **FTI Consulting immediately deployed technical specialists to collect, process, and analyze over seven terabytes of data.** We used our Radiance analytics platform to review the data and quickly produce key evidence for the audit committee. **Within three days of the initial collection, FTI Consulting prepared a report of findings that allowed the company's board to understand the extent of the fraud and to limit further damage.**



## EXPERT WITNESS SERVICES

FTI Consulting provides access to a prestigious team with both in-the-field and in-the-courtroom experience in anti-money laundering related issues. Our experienced global team provides valuable insight and clarity, helping clients during every stage of a contested matter, from early case assessment and discovery to case strategy, and settlement services. Our senior professionals are highly skilled at communicating our findings through expert testimony in various settings, including in federal and state courts, as well as in arbitration and mediation proceedings.

### KEY SERVICES

- Analysis of policies and procedures, KYC documents, customer transactions
- Assistance in developing and responding to discovery requests
- Critiques of opposing expert analyses
- Advice in the settlement process
- Preparation of expert opinions, affidavits and reports
- Formulation of deposition questions
- Research on relevant regulations and compliance matters

## 🔍 CASE STUDY

### *Expert Witness Assessment of Independent Review*

FTI Consulting was engaged to assess and **provide expert witness testimony on the adequacy of a BSA/AML Independent Review** of a financial institution performed by a third party. The financial institution alleged that as a result of an insufficient BSA/AML independent review, senior management and the board of directors were unaware of significant weaknesses and deficiencies that existed in the financial institution's BSA/AML compliance program and therefore were unable to take appropriate action to avoid penalties imposed by regulators. FTI Consulting commented on the adequacy of the prior review and provided clarity on the roles of the bank, the third party and the regulator under the requirements of an effective BSA/AML Compliance Program. **FTI Consulting findings were submitted to the court in the form of an expert report.**

# FTI Consulting Technology Solutions

FTI Consulting provides client-favored customized applications and platforms. Organizations rely on our technology solutions to help them root out criminal activity, maintain regulatory compliance, reduce legal and IT costs, protect sensitive materials, quickly find facts and harness enterprise data to create business value.

## FINTRETO

**Fintreto** is a secure, cloud-based transaction analysis, review and investigation workflow application designed to support transaction monitoring, information requests and sharing, and regulatory reporting efforts.



**Radiance** is a highly-scalable, visual analytics platform that brings clarity and meaning to the massive amounts of electronically-stored information inside today's corporations.



**Ringtail** e-discovery software delivers a unique visual approach to document review and predictive coding that helps legal teams quickly and defensibly tackle review projects of any size.

# Our Anti-Money Laundering, Sanctions & Anti-Corruption Team

FTI Consulting's professionals are:

- Former regulators, prosecutors, and law enforcement officials
- Former bank compliance and operations executives
- Former internal and external financial institution auditors
- Data scientists and business analysts
- Cybersecurity and technology experts
- Forensic specialists
- Certified Anti-Money Laundering Specialists (CAMS)
- Certified Public Accountants, Chartered Financial Analysts
- Attorneys
- Economists
- Policy makers
- Strategic communications professionals



# Why FTI Consulting for Anti-Money Laundering, Sanctions & Anti-Corruption ?

FTI Consulting offers comprehensive and customized services to meet each and every challenge facing financial institutions. Our professionals have the expertise needed to accurately assess problems, understand clients' and regulators' requirements, and design the appropriate solutions. We blend our expertise and investigative experience with our specialized technology and data services to develop cost-effective solutions for our clients.

## EXPERTS WITH IMPACT

FTI Consulting's senior leaders average more than 20 years of experience, combining a deep industry background in regulation, compliance, and investigations, with a long history of successfully undertaking our most sensitive consulting assignments. Supported by a deep bench of experienced junior professionals, FTI Consulting scales and tailors its services

to meet any organizational challenge. Our senior staff members lead from the front and actively participate throughout engagements. We maintain a program of continuous quality assurance and internal challenge.

## CREDIBILITY AND INDEPENDENCE

We are recognized for our credibility with regulators and our independence. We do not provide audit attestation services.

## INDUSTRY, REGULATORY AND CONSULTING EXPERIENCE

Our teams are composed of professionals with senior executive industry, regulatory and consulting experience which enables us to provide practical regulatory insights and support.



## INNOVATIVE & ADVANCED SOLUTIONS

We bring FTI Consulting's experiences from a wide range of industries which face similar challenges, to deliver innovative, pragmatic, and effective solutions for our clients. We offer advanced technology solutions to enable our clients to better manage their governance, risk and regulatory challenges. We have access to a range of economists, statisticians and analysts to support our work.

## LOCAL LANGUAGE CAPABILITIES

We have extensive experience working on complex issues and multi-faceted assignments, to which we bring a wide range of experience, skills and practical knowledge. We provide staff with local language capabilities when needed and work across segments in a collaborative and efficient manner.

## QUALITY AND INTEGRITY

Our heritage of litigation and regulatory assignments underpins a consistent commitment to quality and integrity. Our experience in investigating failures and errors means we know how to ensure they are avoided in future.

# FTI Consulting Awards and Accolades



For the second consecutive year, **Forbes** magazine recognized FTI Consulting in 20 sectors and functional areas in their annual America's Best Management Consulting Firms list (2017)



Named to the "100 Companies That Matter in Knowledge Management" list for the six consecutive year by **KMWorld** magazine (2010-2016)



FTI Consulting received inaugural Consulting Firm of the Year award from **Who's Who Legal** (2017)



Radiance Visual Analytics Platform wins **Computer Technology Review's MVP Award** in the Big Data category (2016)



# FTI Consulting Client Testimonials

"Senior FTI leaders were actively involved throughout the engagement. What we liked most about working with them was their ability to **think strategically and get things done** operationally; sharing their knowledge freely along the way."

– Chief Executive Officer, FTSE 250 Wealth Management Firm

"They provided an **external perspective** on different operating models and validated our thinking on current gaps. Most importantly they reminded people of the consequences of not doing business in the right way by **offering factual case history** on financial crime risk."

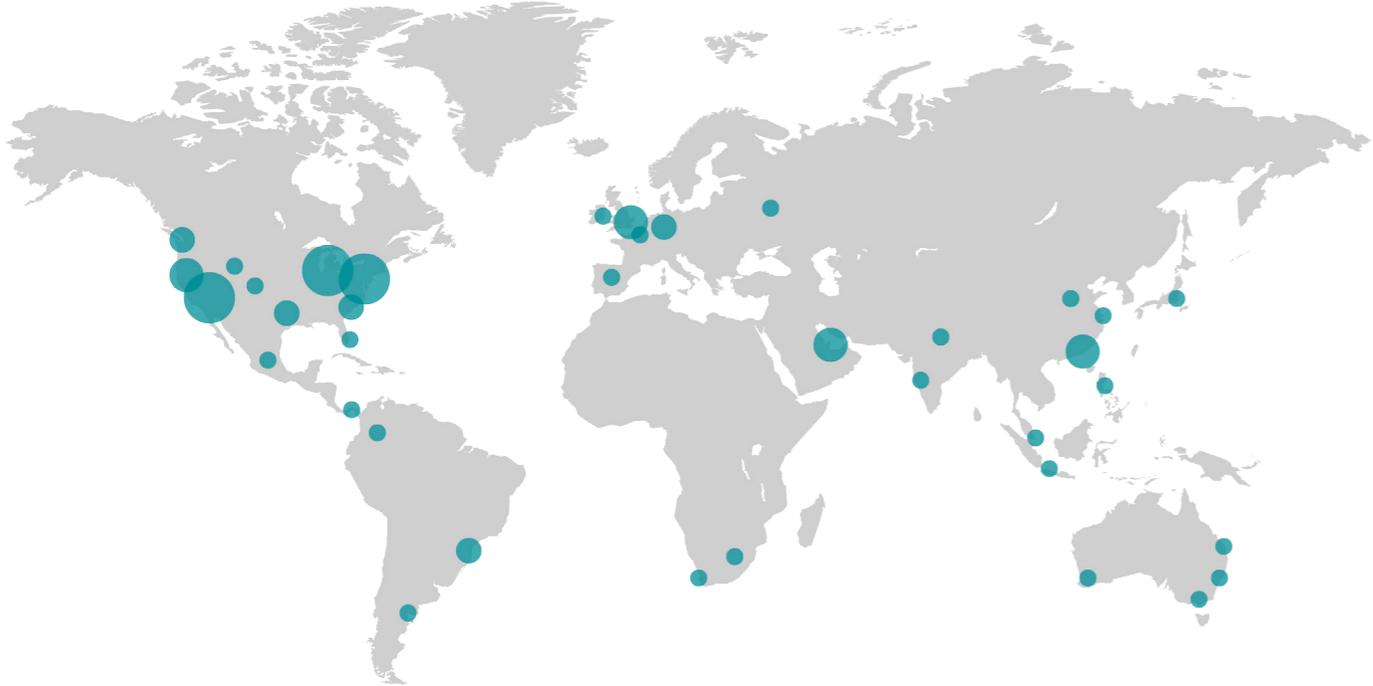
– Head of Human Resources, International Bank

"The work they did, and the way they did it, was exactly as promised. They were **challenging yet supportive**, working in partnership with us throughout the engagement to review and adjust our processes, where appropriate. Their **approach was commercial** and recommendations were pragmatic."

– Chief Risk Officer, High Street Bank

# FTI Consulting Advises Global Clients on all Continents

With offices in every major financial center and every corner of the globe, we successfully serve our clients wherever challenges and opportunities arise.



**\$1.9BLN** Market Capitalization

**FCN** NYSE

**3,600** Consultants & Professionals

**430+** Senior Managing Directors

Advisors to **97** of the world's top **100** law firms



FTI Consulting, Inc. is an **expertise-led, independent, global business advisory** firm dedicated to helping organizations **manage change, mitigate risk and resolve disputes.**



EXPERTS WITH IMPACT

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About FTI Consulting

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[www.fticonsulting.com](http://www.fticonsulting.com)

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