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

FTI Consulting provides end-to-end Anti-Money Laundering consulting services to financial institutions. Our AML professionals are highly experienced in complex investigations initiated by federal and state regulators and law enforcement agencies. We not only lead investigations on a reactive basis, we also serve numerous clients as independent advisors to compliance remediation efforts and as trusted advisors in designing proactive compliance, governance and risk management programs.

SERVICES OFFERED FOR ANTI-MONEY LAUNDERING COMPLIANCE

- Forensic Transaction Reviews
- Enforcement Advisory
- Transaction Monitoring Design, Analytics & Validation
- Investigations & Business Intelligence
- Compliance Program Development, Assessment & Remediation
- Cybersecurity & Technology
FORENSIC TRANSACTION REVIEWS

Our capabilities span the entirety of a forensic transaction review, 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
Large European Bank

FTI Consulting was engaged by a large European bank for a regulatory enforcement action in the U.S. The engagement called for 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 mapped and extracted the relevant data necessary to conduct the review, comprised of over 50 million transaction records stored across four continents, then thoroughly filtered the records to conform to the scope dictated by the regulator. The resulting records were linked to related activity before being uploaded to a secure host environment accessible through FTI’s customized review application.

Our review 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 for the regulator that was ultimately used to achieve an agreeable settlement.

TRANSACTION MONITORING DESIGN, ANALYTICS & VALIDATION

FTI Consulting’s AML technology and large-scale data analysis expertise complement our investigative and compliance expertise to help financial institutions develop effective compliance, detection and risk management programs. FTI’s comprehensive approach to AML monitoring includes a suite of analyses based upon rules-based characteristics, statistical analyses, and sophisticated scoring and weighting algorithms.

KEY SERVICES

- NYSDFS Part 504 “Transaction Monitoring Compliance and Certification” support
- Screening and surveillance system testing
- AML systems integration
- RFI management solutions
- Algorithm tuning, calibration and testing
- Rules-based analyses
- Advanced statistical analyses
- Scoring and weighting methodologies
- Advanced visualization

CASE STUDY
Large Retail and Commercial Bank with International Operations

FTI conducted compliance reviews of feeds from core banking to a leading compliance surveillance system. The technical review consisted of an analysis of key characteristics of the transactions passed from one system to the other to validate that all transactions were successfully passed according to specifications and that data integrity required for the processing of those transactions in the surveillance system was maintained. The review consisted of an analysis of data mapping logic and a review of the implementation of that logic to ensure that the intended mapping, segmentation, filtering and transformation of the data were correctly implemented. We reviewed the logic used to establish customer types and transaction types to validate transactions included in the mappings and recommended modifications where incorrect mappings had occurred which would likely cause and unexpected output.

FTI also made recommendations regarding the mapping and transformation logic, data included and excluded into the feeds, the retention period and other issues with an impact on both the effectiveness of the surveillance system itself and the investigations process associated with the surveillance system.
ANTI-MONEY LAUNDERING SERVICES

FTI Consulting develops and assesses comprehensive AML compliance programs, including key components such as compliance structure, policies and procedures, risk assessments, control effectiveness, training and governance. We help to 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 any remediation efforts needed to bring a current program into compliance with regulatory requirements.

KEY SERVICES
• Develop new and assess existing AML compliance programs
• Implementation of CIP/KYC/CDD/EDD best practices
• Governance 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
U.S. Banking Regulator

Pursuant to a settlement with a U.S. banking regulator, FTI Consulting was engaged to serve as the Monitor for an international bank and ensure that the terms of the settlement were met. 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.

ENFORCEMENT ADVISORY

FTI Consulting leverages our team of former bank regulators, law enforcement personnel and industry professionals to support clients in the midst of 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 in place and effectively operating, we help our clients meet the challenges of complying with the continuously evolving regulations and avoid regulator, law enforcement and reputational “hot buttons.” We assist clients by performing independent compliance reviews and testing, and offer support in examinations and enforcement investigations. We also provide forensic investigations, post-transaction analyses, due diligence, employee and board training, and litigation consulting services.

KEY SERVICES
• Independent forensic transaction review (lookbacks)
• Independent program assessments
• Ex post audit
• Inquiry and incident response
• Data extraction, management and hosting
• Data mapping

INVESTIGATIONS & BUSINESS INTELLIGENCE

To develop and support robust KYC / CIP / EDD systems, FTI Investigations, a licensed private investigations company, has unmatched expertise in the search, synthesis and analysis of information from public and nonpublic 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
• Discrete 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
Services to our clients

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

CYBERSECURITY & TECHNOLOGY

FTI Consulting helps organizations better govern, secure, find, analyze, protect and rapidly make sense of information as data grows in size and complexity. FTI provides two customized platforms to clients: Radiance and Ringtail. 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 master projects of any size. Organizations rely on us to help them root out money laundering, maintain regulatory compliance, reduce legal and IT costs, protect sensitive materials, quickly find facts and harness organizational data to create business value.

KEY SERVICES

• Implement and execute Information Governance and Cybersecurity policies
• Cyber investigations and incident response
• Data identification, collection and preservation from all electronic media
• Cyber planning, audit, risk assessment, architecture design and penetration testing
• Computer forensic analysis
• Data deduplication and e-discovery processing
• Secure document hosting onsite, in-country and international
• Foreign language review

CASE STUDY

Audit Committee Rush Request

FTI Consulting responded to an audit committee’s after-hours request to investigate potential fraud that implicated a major public corporation; a New York based financial services company that had a market cap of $3.5 billion. FTI promptly deployed consultants to collect, process and analyze complex transactional and document data including over 7 terabytes of electronically stored information. We used Radiance to review and produce the data quickly. Within just three days of the initial collection, FTI was able to produce a report that allowed the board and audit committee to limit further damage.

FTI Consulting’s AML professionals are:

• Former regulators, prosecutors and law enforcement officials,
• Former bank compliance executives,
• Former internal and external financial institution auditors,
• Data specialists, and
• Certified Anti-Money Laundering Specialists (CAMS).
Why FTI Consulting for Anti-Money Laundering services?

FTI Consulting offers comprehensive and customized AML services to meet each and every challenge facing financial institutions. Our AML professionals have the expertise to properly assess problems, anticipate and understand clients’ and regulators’ requirements, and design the right solutions. We blend our AML expertise and investigations experience with our robust technology and data services to develop cost-effective solutions.

AML PROFESSIONALS
Our senior leaders average more than five years of tenure with FTI Consulting combining a deep industry background in regulation, compliance and AML, with a long history of successfully undertaking our most sensitive consulting assignments. Coupled with a deep bench of experienced resources, FTI Consulting scales and tailors its services to meet any client need.

INVESTIGATIONS AND BUSINESS INTELLIGENCE
FTI Investigations is a licensed private, international investigations company with unmatched expertise in the search, synthesis and analysis of information. We support:
- Investigations and fact finding undertakings,
- Regulatory reporting, and
- Enhanced due diligence.

CYBERSECURITY AND TECHNOLOGY
With our growing use and dependence on data, no solution can be complete without robust digital capabilities. FTI Consulting’s technology experts have the skills and tools to pursue any investigation through digital networks and trails. By integrating our AML and Technology expertise, FTI offers unparalleled investigative capabilities along with sophisticated tools to support ongoing compliance efforts. Our offerings include:
- Ringtail e-discovery and Radiance, and
- Secure hosting.

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.