



# AML AUDITS: THEMES ACROSS INDUSTRIES

Presented by

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# U.S. FEDERAL REGULATORY AGENCIES

## Financial Crimes Enforcement Network (FinCEN)

Secretary of the Treasury has delegated to FinCEN the authority to implement, administer, and enforce compliance with the BSA and associated regulations.

Banks Credit Unions	FRB – Federal Reserve Bank OCC – Office of the Controller of the Currency FDIC – Federal Deposit Insurance Corporation NCUA – National Credit Union Association State Banking/Dept. of Financial Institutions
Securities Broker-Dealers Mutual Funds / Investment Companies	SEC – Securities & Exchange Commission FINRA – Financial Industry Regulatory Authority (3130) MSRB – Municipal Securities Rulemaking Board (G41)
Futures Commission Merchants (FCMs) Introducing Brokers (IBs) Commodity Pool Operations (CPOs) Commodity Trading Advisors (CTAs)	CFTC - Commodity Futures Trading Commission NFA – National Futures Association (SRO-Rule 2-9)
Money Services Business (MSBs) Casinos & Gaming Precious Metals & Gems Dealers Residential Mortgage Lending Originators (RMLOs) Insurance Companies	IRS –Small Business Division States – Department of Financial Institutions (DFIs)
Non-MSB Virtual Currency Companies	NY Department of Financial Services
Voluntary Programs Program Managers (prepaid programs) Credit Cards	Bank Partner / Sponsor Bank / Issuing Bank

# THEMES OBSERVED

<p>Banks Credit Unions</p>	<p>EDD SAM Staffing Training OFAC Alerts Management</p>
<p>Securities Broker-Dealers Mutual Funds / Investment Companies</p>	<p>Risk Assessment EDD SAM Staffing Training OFAC Alerts Management</p>
<p>Money Services Business (MSBs) Precious Metals &amp; Gems Dealers Residential Mortgage Lending Originators (RMLOs) Insurance Companies Credit Cards VC Companies (non-MSB)</p>	<p>Risk Assessment KYC, EDD SAM Staffing Communications / Governance Training OFAC Alerts Management</p>
<p>Voluntary Programs, such as:</p> <ul style="list-style-type: none"> <li>• Payment Processors / PayFacs</li> <li>• Prepaid Card Program Managers</li> </ul>	<p>KYC, EDD SAM Staffing Communications / Governance Training OFAC Alerts Management</p>

# Contact Information

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