



**MORLEY GROUP**  
20 Years of BSA/AML Solutions

## **1. BSA/AML/OFAC Assessment**

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Our BSA/AML/OFAC Assessment is a unique service provided by The Morley Group. The Assessment is designed to bring financial institutions into total compliance with the new FFIEC Bank Secrecy Act Anti-Money Laundering Examination Manual requirements. With this service, we assess the financial institution's compliance with each requirement pertaining to the financial institution's market/service mix. Our Assessment Report is a comprehensive presentation of the financial institution's compliance. Each requirement is fully documented in the report to provide examiners (and the financial institution) with evidence of compliance. The Assessment Report is specifically designed to be presented to the financial institution's independent auditors and examiners. Our clients view these services as an investment that could materially enhance their bottom line.

With our BSA/AML/OFAC Assessment service, financial institutions' pre-examination work should be substantially reduced. Upon receipt of the examiners' pre-engagement letter, the financial institution can provide the examiners with the Assessment Report. The Report should answer many of the pre-examination questions and provide the examiners with substantial documentation. We believe our retention for these assignments is indicative of The Morley Group's credibility with the regulators.

While the Assessment is not designed to test transactions, it nonetheless functions as a comprehensive review of the financial institution's BSA/AML/OFAC system. Should the Assessment identify areas of weakness or non-compliance, the Report will so indicate; but more importantly, the Report will set forth a recommended work-plan to remedy each weakness or deficiency.

The BSA/AML/OFAC Assessment does not replace the transaction testing function of independent audits or examinations; however, it should significantly reduce the time involved in the audit/examination process, as it addresses all audit/examination requirements except the transaction testing function. In addition, the Assessment will provide the financial institution with a significant comfort level that audit and examination findings will be favorable.

## **2. BSA/AML/OFAC Training**

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The Morley Group has been training bankers, regulators, law enforcement, and foreign government officials for over 25 years. Our training has included all aspects of the BSA, the intricacies of detecting and preventing money laundering, best practices in designing and maintaining effective BSA compliance systems, and methodologies of conducting complex financial investigations. Our training is not theoretical. Nor is it simply regurgitations of law and regulations. We give our audiences information they can use in their day-to-day operations. Where possible, we include job-aids that can be taken back to the desk and used. The effectiveness of our training is demonstrated by the list of training clients.

The Morley Group has designed specific training modules for clients. We design our training for specific client needs – we do not do cookie-cutter training. For instance, if the audience is the client's credit department, we design our training in close coordination with the client's desires, and the spe-

cific needs our years of experience tells us credit departments need.

A unique feature of The Morley Group's training centers around our years of experience in defending financial institutions against potential civil or criminal charges, as well as our experience in law enforcement and the U.S. Senate Permanent Subcommittee on Investigations. The Morley Group has spent over 25 years in the trenches of BSA/AML issues.

### **3. Responding to Regulatory Sanctions and Potential Civil/Criminal Actions**

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The Morley Group has extensive experience in responding to regulatory sanctions. We have been retained as consultants on several protracted engagements arising out of regulatory mandates under regulatory cease and desist orders. One such engagement required the in-depth review of three years of bank transactions to determine if all CTRs and SARs had been properly filed. Another required the re-creation of two years of complex international financing transactions conducted by the international department of a bank.

The Morley Group has also been retained by financial institutions that had discovered suspicious transactions of such magnitude that civil and/or criminal sanctions might be brought. In these circumstances, The Morley Group, drawing upon years of experience both as investigators and as an integral part of criminal defense teams, assisted counsel and the client in fully understanding the transactions, tracing all related transactions to determine the full magnitude of the potential liability, and making presentations to regulators or prosecutors.

The Morley Group has been an integral part of the defense teams in some of the largest money laundering and civil forfeiture cases brought in the U.S. Counsel has relied upon The Morley Group to unravel the most complex of international financial transactions. The Morley Group specializes in making the complex simple. We aim to translate these types of transactions into presentations that can be clearly understood by a twelve year old. Attorneys have found our unique "trial books" invaluable in their presentations of cases to regulators and prosecutors.

Our 25 years of experience in the field of regulatory and criminal sanctions have made The Morley Group an outstanding resource when it comes to the unraveling and clear presentation of banking and financial transactions.

### **4. Independent Audit Program Designs**

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As a result of the years of experience in dealing with bank regulators and law enforcement officials, The Morley Group is in a unique position to design independent audit programs addressing BSA/AML/OFAC systems. Many of our clients have found themselves under regulatory scrutiny, notwithstanding having received "excellent" results from independent audits. Clearly, there has been a breakdown in the scope of independent audits in this crucial area.

The Morley Group has been tasked by provisions of regulatory cease and desist orders to design and oversee comprehensive independent audit programs for client banks. Our programs have been subjected to scrutiny and approval by the regulators in these particular assignments. In conjunction with our BSA/AML/OFAC Assessment Service, we can now provide clients with independent audit programs that should prevent the recurrence of audits with inadequate examination scopes.