

# MONITORSHIPS

## BANKING + FINANCIAL MONITORSHIPS

We regularly assist traditional and nontraditional financial institutions through active monitoring of problems related to BSA/AML issues, sanctions compliance, and the overall effectiveness of compliance programs. We are adept at navigating the challenges of monitoring complex global banks – tackling difficult issues head on and pursuing compliance issues that require assessments across multiple business lines and far-flung geographic locations – all within the context of different operating models, persistent cultural issues, and varying secrecy laws and business traditions.

We have expertise in data acquisition, migration, modeling, and statistical analysis of transactional activity. We can evaluate for unusual and suspicious activity by performing clustering, velocity, link and other statistical analyses, including correlation & regression analyses. Our assistance includes selecting appropriate transaction monitoring software, conducting lookbacks, and refining rules using those analyses.

Additionally, we regularly work on overall governance issues to improve and enhance a bank's ability to sustain remediation and change, including transversal remediation programs and global internal controls programs. We recognize that achieving sustainable best practices is one of the most significant challenges to an Independent Consultant (IC). The success of this effort is not measured by how well the entity does when the IC is present, but by what occurs after the team leaves.

We have served in these capacities with over 25 appointments by or with approval of the Department of Justice, United States Attorneys' Offices, and the Attorney General of the State of New York, among other state, local, and federal regulatory agencies. We have also been retained independent of any government settlement or appointment to assist in self-motivated remediation projects. In these cases, we apply the same expertise as we apply in a formal appointed monitorship.